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River Valley and Glacial Sand and Gravel safeguarding options

| Name | Organisation | Representation |
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| Mr Binns | Ramblers Association | <p>River Valley and Glacial Sand and Gravel.</p> <p>Q1. We agree your preferred option (D).</p> <p>Refine and amend the existing consultation areas to safeguard the entire river valley and glacial sands and gravels.</p> <p>In safeguarding the whole resource maximum control of development is applied to some of the counties best areas of high landscape value.</p> |
| Mr Gage | | Agree - Need to safeguard a valuable resource. |
| NCC Planning Policy team | Northamptonshire County Council | Agree overall, however exclusion of land identified in non-minerals and waste development plans may result in missed opportunities for prior extraction. |
| Mrs Smith | Bedfordshire Council's Planning Consortium | <p>Thank you for consulting us on the Minerals Safeguarding Areas Consultation.</p> <p>We do not have any comments on the general strategy for safeguarding mineral deposits. We will have site specific concerns which will be applied on a case by case basis.</p> <p>BCPC broadly supports Central Bedfordshire Council's preferred options particularly:</p> <p>the gravel protected site adjoining the M1.</p> |
| Mr Hickman | Southill Parish Council | <p>Southill Parish Council disagrees.</p> <p>In Appendix A: Appraisal Matrices it is clearly stated that the preferred option D has uncertain effects with regard to biodiversity, cultural heritage and landscape. It then goes on to claim that effects will be positive or neutral. Given these uncertainties, a worst case scenario should assumed to be possible and a negative</p> |

| Name | Organisation | Representation |
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| | | <p>effect score should be given. The recommendation for which option is preferred should take this into account or, better still, the uncertainties should be more thoroughly assessed so that a decision can be made based on facts and properly considered future scenarios.</p> <p>The preferred option D safeguards the biggest area. A large scale development, within a previously agreed local development framework area, might be not permitted if the safeguarded areas are so large. There might then be pressure for development outside of the safeguarded area and also outside of local development framework areas. This would put new development pressure on areas previously excluded. One resident of Broom has described this as “danger may be the postponement or cancellation of building elsewhere, resulting in increased pressure on hitherto unthreatened sites.”</p> |
| Mr Payne | Mineral Products Association | Agree overall but DISAGREE that areas identified for development in non-minerals development plans (including waste plans) should be excluded. MSAs should be identified on the basis of the presence and quality of the resources and then tests applied to any non-minerals development proposal that may lead to sterilisation. The policy of prior extraction should also apply to such areas. |
| Mr Purton | David Lock Associates on behalf of Brooklands. | <p>Thank you for this opportunity to comment on the emerging Mineral Safeguarding Areas Document. On behalf of our client, Places for People, who in tandem with Milton Keynes Partnerships, Milton Keynes Council and your planning colleagues in Central Bedfordshire are delivering the strategically important Brooklands residential development as part of the Milton Keynes Eastern Expansion Area (EEA) we have reviewed the published documentation.</p> <p>In the light of our understanding and our client’s shared long stated aspirations we wish to formally object to the identification of land immediately to the east of the M1 corridor in the vicinity of Salford village as Mineral Safeguarding Area (MSA) for river valley and glacial sand and gravel, as shown within draft options B, C and D.</p> <p>We believe that the identification of MSA at this location will inevitably lead to adverse impacts for the 7,000 new residents at Brooklands and threaten its ability to deliver the agreed vision for a vibrant mixed-use development – crucial for the sustainable expansion of Milton Keynes. There are a number of points we wish to make with regard to the preferred option and its implications for the future character and environment of the Brooklands site, which we set out below.</p> |

| Name | Organisation | Representation |
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| | | <p>Question – River valley and glacial sand and gravel Safeguarding Options: Do you agree or disagree with the preferred MSA for sand and gravel? Please state your reasons.</p> <p>We object to the preferred MSA for sand and gravel and further object to the identification of MSA within the area located to the east of the M1. Due to the fact that Central Bedfordshire have imposed weight restriction measures to safeguard the residential amenity of its residents we believe that the quarrying of the mineral deposits in this location will attract large numbers of HGVs that would cause a detrimental impact to the character and appearance of the Eastern Expansion Area of Milton Keynes.</p> <p>We are further concerned that the identification of MSA for sand and gravel in this area would have significant implications upon the Brooklands site beyond the agreed restoration measures which have already been permitted for this area. The rationale for this concern is based upon the following facts:</p> <ul style="list-style-type: none"> • the development of Brooklands will result in a dramatically changed character and appearance for this former rural area into a built up mixed-use development. Indeed, the advanced strategic open space, the sustainable urban drainage system, the first homes, the first of three schools and the primary highway works are now complete at Brooklands. Homes are occupied and additional units are now under construction; • currently HGV vehicle movement is prohibited through Salford village and the rural lanes of Bedfordshire. Consequently, any further mineral workings and subsequent restoration programmes will therefore result in the increased volumes of traffic on Salford Road and hence through Brooklands. This raises grave concerns relating to the future provision of pedestrian and highway safety in Brooklands and the wider Eastern Expansion Area; • the development proposals for Brooklands (as discussed at last months joint LPA and Parish workshop) includes the realignment and re-characterisation of Salford Road from a rural road with a speed limit of 60mph to a 30mph tree lined city street, directly fronted by residential properties with gardens of up to 3m depth; • Salford Road will make a direct connection to a new pedestrian-focused Brooklands Square that will act as the centre for commercial, retail, medical and educational uses (including a further 420 place primary school, a private crèche and a secondary school for 1,500 pupils); |

| Name | Organisation | Representation |
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| | | <ul style="list-style-type: none"> • the newly built Brooklands Farm Primary School (which accommodates a nursery and some 420 children) is situated on land directly abutting the downgraded A5130 and as a result will be a busy location used by children and parents walking and cycling to school and can therefore no longer be regarded as an appropriate route for HGV traffic leaving Salford Road. <p>The designation of Brooklands and the EEA with a total population of some 12,000 new residents represents decades of carefully considered and thoughtful forward planning and design from both the public and private sector that will create a new successful mix-use residential area that will form the next phase in the development story of Milton Keynes. The possible designation of MSA sadly threatens the implementation of this vision and the health and safety of its new residents. We would therefore encourage Central Bedfordshire to reconsider its preferred option, refer to its planning colleagues who have been a party to the creation of the Brooklands vision and thereby conclude that identifying a MSA in this location is no longer appropriate due to the changing circumstances of the localities hinterland.</p> |
| Mr Warren | Heaton Planning (on behalf of Lafarge Aggregates) | <p>RiverValley and glacial sand and gravel safeguarding options</p> <p>We agree with the approach being promoted by the Council in the safeguarding of river valley and glacial sand and gravel resources. The approach being promoted offers the safeguarding of the workable sand and gravel resource and is a sensible, logical approach to ensure the effective safeguarding over the plan period in accordance with national minerals planning policy guidance.</p> |

River valley sand and gravel: summary of representations with recommended changes

Explanatory note:

The variability of the river valley sand and gravels, means that compared to other bulk minerals, it is more difficult to be precise about the location and likely extent of potentially workable resources. In addition, the yield of mineral per hectare is relatively low compared to other minerals, and therefore the operational life of these workings is relatively short. Consequently the minerals industry has to find new sites regularly in order to continue to meet the demand for construction materials.

Summary of representations and recommended responses:

- Areas identified for development in non-minerals development plans should be included within the MSA, which should be identified on the basis of the presence and quality of resources, followed by tests applied to any non-minerals development proposal that may lead to sterilisation.

There are no areas identified for development in non-minerals development plans which overly sand and gravel resources as defined in the original Mineral Consultation Areas (see 'Map 2'). It is intended that current non-minerals site allocations fall outside of the area of the sand and gravel MSA. All future development plan allocations will be subject to MSA policy where they fall within an MSA.

- Identification of MSA could result in increased pressure for non-minerals development outside of the safeguarded areas, as these become more attractive by comparison.

MSA policy is unlikely to influence the location of surface development or be a constraint on their location.

- New quarrying would have on the Brooklands residential development as part of the Milton Keynes Easter Expansion Area.

The identification of MSAs is not about identifying sites for future extraction, and there is no presumption that MSAs will be worked. Therefore consideration of the impact of quarrying on the Brooklands residential development is outside of the scope of this policy.

Recommended changes:

None

The Woburn Sands Formations safeguarding options

| Name | Organisation | Representation |
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| Mr Claxton | Aggregate Industries | Agree with the recommended preferred option, however, the map should be modified to exclude those areas previously worked for silica sand and now restored. This is to ensure that any future development of restored areas of mineral working is not prejudiced by unnecessary mineral safeguarding. |
| Mr Gage | | Agree |
| NCC Planning Policy team | Northamptonshire County Council | Agree overall, however exclusion of land identified in non-minerals and waste development plans may result in missed opportunities for prior extraction. |
| Mike Hurley | Sibelco | <p>Paragraphs 4.8 to 4.10 – The Woburn Sands</p> <p>Sibelco UK supports the preferred Option D for safeguarding the Woburn Sands.</p> <p>Sibelco UK is in agreement with the clear understanding that the Woburn Sands can and do vary considerably in physical (and chemical) characteristics from location to location and only site specific investigations can define potential areas for working in detail.</p> <p>An amendment to the wording of the latter part of the final sentence of paragraph 4.10 is proposed in order to better reflect accepted terminology in relation to minerals reserves and resources (refer to international codes such as the Pan-European Reserves and Resources Reporting Commission (PERC)):</p> <p>“ it is appropriate to safeguard the entire mineral resource area to ensure that all potential mineral resources are protected from sterilisation”. It is also proposed that it should be made clear in the safeguarding document that protection of the mineral resource may include not only the known outcrop of the mineral but also, as appropriate, the sub-crop of the mineral where extraction beneath overburden materials may be undertaken. This is already common practice for the Woburn Sands and mineral resources which may not be economic to work today may become economic to work in the future with increasing thickness of overburden required to be removed and replaced.</p> |

| Name | Organisation | Representation |
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| | | <p>All mineral resources are potentially of economic importance and it is important that the whole outcrop, appropriate areas of the sub-crop of a geological formation and buffer zones to these areas are assessed in the determination of a MSA for each specific mineral type within a given area/Authority boundary as depicted on the British Geological Survey Mineral Resources Map for Bedfordshire (Mineral Resource Information for Development Plans, Bedfordshire, 1995).</p> |
| Ms Fry | Woburn Sands and District Society | <p>Re: Mineral Safeguarding Areas: Consultation Document</p> <p>We have considered this document carefully and with one exception we agree and support Central Bedfordshire Councils preferred options as set out in this document, for the reasons set out.</p> <p>The one exception to this view is the Woburn Sands Formation safeguarding options.</p> <p>We are the view, that Option B as shown on Map 1 is the option that should have been chosen for the following reasons:</p> <ol style="list-style-type: none"> 1. The Greensand Ridge is an important landscape and environmental feature and should not be further eroded by mineral excavation beyond the former and current permitted extraction sites, and those sites put forward for consideration as part of the Minerals and Waste Local Development Framework. 2. A substantial amount of the area is protected from sterilisation by development by the Southern Greenbelt 3. We consider that safeguarding the whole Woburn Sands formation is too high risk in terms of this valuable natural feature when Woburn Sands is abundant, and the sporadic nature of silica sands and Fullers Earth, potentially giving rise to destructive exploration. Potential site applications should only be considered on a site by site basis so that the full impact can be assessed. With the exception of Woburn Sands, the Society would support all other aspects of this report, and hope you find our comments helpful. |
| Mr Gilbert Wooldridge | English Heritage | Woburn Sands Formation Safeguarding Options |

| Name | Organisation | Representation |
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| | | <p>The consultation document states that the preferred option for safeguarding Woburn Sands is to safeguard the entire resource area, including all sites put forward by the minerals industry and excluding areas already overlain by built development and/or allocated for other developments. As the Building Stone Atlas identifies, the Woburn Sands Formation has resulted in a number of Bedfordshire buildings being constructed of Lower Greensand stone (also known as ironstone or carstone), with the Strategic Stone Study data spreadsheet revealing a number of quarry locations. The safeguarding of all Woburn Sand resources means that, in theory, the building stone quarries and the minerals within and around them are safeguarded for potential conservation purposes. However, it would be helpful if some recognition could be given to the potential use of Woburn Sands for building stone and conservation purposes, as this is not mentioned by the consultation document.</p> |
| Ms Payne | Mineral Products Association | <p>Agree overall but DISAGREE with exclusion of areas identified for development in non-minerals plans (including waste plans). MSAs should be identified on the basis of the presence and quality of resources, and development that may sterilise these should be subject to tests (as set out later in this consultation). The policy of prior extraction should also be applied to such areas.</p> |
| Mr Gardner | Hives Planning | <p>We act on behalf of Arnold White Estates which has significant land holdings around Leighton Linlade. Please accept this letter as a representation on the MSA</p> <p>Consultation Document. We appreciate that the purpose of a MSA is to ensure that the Mineral Planning Authority must be consulted should surface development proposals have the potential to sterilise mineral deposits. However, the areas to be safeguarded must clearly contain viable mineral deposits to make the MSA credible.</p> <p>Our representation concerns the following areas:</p> <p>Chamberlains Barn, Leighton Linlade -</p> <p>The area south of Shenley Hill Road is not included as part of the MSA, which we support, although two small rectangles appear on the map which is probably a graphical error, there is certainly no unworked mineral in this area.</p> |

| Name | Organisation | Representation |
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| | | <p>We suggest that the following areas are removed from the proposed MSA, they contain no further workable mineral deposits.</p> <p>South of Leighton Linlade -</p> <p>The area north of the A505 to the edge of the urban area has no unworked mineral deposits within it, or what little is left is already being worked and will soon be worked out. Thus the A505 should be the northern limit of the MSA in this location.</p> <p>Mile Tree Road -</p> <p>Land to the west of Mile Tree Road, the “Nash Tenancy” (shown on the attached plan), has already been quarried and restored, it contains no further workable mineral deposits.</p> <p>New Trees Quarry -</p> <p>Land north of Shenley Hill Road (shown on the attached plan) has already had all workable mineral deposits extracted. Nine Acres Quarry Land east of Mile Tree Road (shown on the attached plan) has already had all workable mineral deposits extracted.</p> <p>Stone Lane Quarry -</p> <p>Land south of Woburn Road (shown on the attached plan) has already had all workable mineral deposits extracted.</p> <p>Please let us know if you disagree with our assessment of these and their removal from the MSA, and please keep us advised of the next stages in production of the document.</p> |

Woburn Sands: summary of representations with recommended changes

Explanatory note:

The Woburn Sands are extend from Leighton Buzzard in the west, to Potton in the east. The sands show marked variation in quality and particle size distribution from place to place, and this enables them to be utilised for a variety of uses, including concreting, building, asphaltting, and Silica sands.

Summary of representations and recommended responses:

- Supporting text should give recognition to the potential use of Woburn Sands for building stone, and for conservation purposes (e.g. ironstone / carstone).

It is acknowledged that whilst most of the Woburn Sands formation consist of loose, unconsolidated sands that are not suitable as building stone, several horizons towards the top of the sequence have cements that bind the grains tightly together, producing irregular beds of resistant rock. This rock has been worked in the past as a source of building stone for rough rubble walling, to highly durable stones which can be dressed for coursed work or used for quoins etc. It is therefore agreed that the text should be amended to highlight the potential use of Woburn Sands as a source of building stone for restoration work. Since these potential building stones occur within the Woburn Sands formation protected by this MSA, they will enjoy protection by proxy, and hence, no change to the proposed MSA is required.

- Areas identified for development in non-minerals development plans should be included with the MSA which should be identified on the basis of the presence and quality of resources and then tests applied to any non-minerals development proposal that may lead to sterilisation.

Only one area identified for development in a non-minerals development plan has been removed from the Woburn Sands resource area as defined by existing Mineral Consultation Areas (see 'Map 2'): the Leighton Linslade Site Specific Strategic Allocation (SSSA) from the Luton and South Bedfordshire Joint Core Strategy. However, this site (Chamberlains Barn Quarry) is currently being worked, and surface development will only proceed once extraction is complete. It is therefore appropriate that this SSSA was excluded from the MSA.

- MSA should be modified to exclude those areas previously worked for Silica Sand and which are now restored. These include:

Chamberlains Barn, Leighton Linslade - Two small rectangles appear on the map which is probably a (graphical error), there is no unworked mineral in this area.

Agree with suggestion

South of Leighton Linlade - The area north of the A505 to the edge of the urban area has no unworked mineral deposits within it, or what little is left is already being worked and will soon be worked out. The A505 should be the northern limit of the MSA in this location.

Uncertain, therefore a plan has been requested from the respondent.

Mile Tree Road - Land to the west of Mile Tree Road, the "Nash Tenancy" has already been quarried and restored, it contains no further workable mineral deposits.

Not certain - we will check our records to see whether this is true.

New Trees Quarry - Land north of Shenley Hill Road has had all workable mineral deposits extracted. Nine Acres Quarry Land east of Mile Tree Road has also had all workable mineral deposits extracted.

Disagree with statement - workable mineral still present and permission still active.

Stone Lane Quarry - Land south of Woburn Road has had all workable mineral deposits extracted.

(Insert large scale map of Leighton Buzzard area here).

Agree - remove area from MSA).

Recommended changes:

- Amend text to highlight the potential use of Woburn Sands as a building stone for restoration.
- No change necessary.
- Amend Woburn Sands MSA removing those areas which have had all workable mineral deposits extracted.

Fuller's Earth safeguarding options

| Name | Organisation | Representation |
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| Mrs Smith | Bedfordshire Councils Planning Consortium | Regarding sand and Fullers Earth BCPC would prefer Option B over Option D as the area around Woburn Sands is already protected by Green Belt. |
| Mr Binns | Ramblers Association | Do not identify specific MSAs for Fullers Earth, instead safeguard Fullers Earth as part of the overall Woburn Sands MSA in which the deposits occur. Reason for RA agreement is as above. |
| Northamptonshire CC (Planning Policy) | Northamptonshire County Council | Agree |
| Mr Gage | | Agree- As Option C |

Fuller's Earth: summary of representations with recommended changes

Explanatory note:

Fuller's Earth is a rare clay with a restricted distribution in Britain. Its unique properties have resulted in its use in a wide variety of industrial applications, including absorbents and filters, and as a bonding agent for foundry sands.

Summary of representations and recommended responses:

- One respondent disagreed with the preferred approach, preferring option B (limit MSA to former permitted Fuller's Earth workings using a 250 metre buffer zone) since the area around Woburn Sands is already protected by Green Belt.

National guidance stresses that Mineral Safeguarding should not be curtailed by other planning designations, such as urban areas and environment designations (including Green Belt) without sound justification. Defining MSAs alongside cultural and environmental designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning considerations. In addition, Mineral Policy Statement One states that while there is a general presumption against inappropriate development in the Green Belt, "mineral extraction need not be inappropriate development, nor conflict with the purposes of designating Green Belts".

Recommended changes:

No change necessary.

Chalk safeguarding options

| Name | Organisation | Representation |
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| NCC Planning Policy team | Northamptonshire County Council | Presence of AONB and MPS1 present a policy block which may not exist in the future (long-term). Safeguarding should look beyond the plan period, safeguarding the entire chalk area (Option C) would provide for the longer-term / future generations. |
| Mr Crofts | National Trust | <p>Due to the extent of existing reserves, and the existence of the AONB, it is not necessary to safeguard the entire resource.</p> <p>Option A is therefore preferred as this affords greater flexibility for land owners.</p> <p>The National Trust favours this approach as it has responsibility for the provision, maintenance and improvement of green spaces and public amenities in this area. Inclusion of these areas within an MSA would introduce unnecessary and unhelpful complicating factors to the management of its facilities.</p> |
| Mr Gilbert Wooldridge | English Heritage | <p>Chalk Safeguarding Options</p> <p>The consultation document states that the preferred option for safeguarding chalk is to safeguard existing active sites only, with a buffer of 250 metres around each site. This would include the Totternhoe Stone Quarry, which is a source of building stone and we therefore welcome its safeguarding. The Strategic Stone Study data spreadsheet identifies other possible chalk building stone quarries in the Totternhoe area, most of which are covered by the proposed mineral safeguarding area.</p> <p>However, the data suggests that there might be sources of chalk just outside the proposed safeguarding area, and it might be worth re-assessing the 250m boundary around the existing quarry to see whether this needs extending.</p> |
| Mr Binns | Ramblers Association | <p>Q3. Your preferred option is (B), Ramblers preferred option is (C).</p> <p>Safeguard the entire chalk resource as defined by the existing minerals consultation areas.</p> <p>This gives more scope for the control of non mineral development in chalk open country areas.</p> |

| Name | Organisation | Representation |
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| Mr White | Chilterns Conservation Board | <p>Response of the Chilterns Conservation Board</p> <p>1. The Board's key concern relates to the mineral safeguarding area (MSA) for the chalk group. Safeguarding seeks to ensure that minerals are not sterilised by development in the future. The importance of the Kensworth Quarry is recognised by the Board. The chalk safeguarding options are – A: do not safeguard the chalk resource, B: limit the MSA to current permitted chalk quarries using a 250m buffer zone and C: safeguard the entire chalk resource area as defined by the existing Minerals Consultation Areas.</p> <p>2. The Councils have stated that option B is the preferred option. The Board does not object to the principle of safeguarding the existing resource. However, on closer examination, the plan detailing the preferred MSAs shows that the MSA for Kensworth Quarry extends for quite some distance in all directions beyond the currently worked area. The Board is concerned that to the west the plan shows the MSA extending beyond the B4541 road onto Dunstable Downs. Any development in this area would clearly affect the AONB as well as the SSSI in this location and the main road. The Board is also concerned about the extent of the MSA to the north west, east, south east, south and south west and notes that a large area of the AONB that is currently undeveloped would be included as well as various buildings at Isle of Wight Farm and Churchend Kensworth. The Board considers that development of the quarry to this extent would have a significant detrimental impact on the natural beauty of the AONB. The Board therefore considers that the MSA for Kensworth Quarry should be reduced in size to properly reflect a 250m buffer zone that is mentioned in option B alongside a consideration of the actual extent based on geographic features. A more detailed plan should be produced arising from any changes made.</p> |
| Mr Bustard | Natural England | <p>Thank you for consulting Natural England on the Mineral Safeguarding Areas consultation.</p> <p>We have few comments to make on this consultation, welcoming in particular the acknowledgement of policy strength towards the Chilterns Area of Outstanding Natural Beauty. We assume that similar policy strength applies towards Sites of Special Scientific Interest and other sites designated for their nature conservation value, although this is not explicit in the report, but will no doubt be represented elsewhere in spatial policy.</p> <p>Other than this we have no particular comments to make.</p> |

Chalk: summary of representations with recommended changes

Explanatory note:

Chalk is currently extracted from two quarries within the Plan area: Kensworth for cement manufacture, and Totternhoe as a source of building stone used in building restoration and conservation work.

Summary of representations and recommended responses:

- MSA policy should safeguard the entire chalk area (option C).

For reasons set out in the consultation document, it is not considered necessary to safeguard the entire Chalk resource area.

- Chalk should not be safeguarded, as inclusion of these areas within an MSA would introduce unnecessary and unhelpful complicating factors to the management of National Trust facilities.

Policy MSA 1 sets out those developments which would be exempt from MSA policy. The wording of this policy will be amended to clarify those forms of development which are exempt. We therefore do not agree that the designation of the Chalk MSA would introduce unhelpful complicating factors to the management of National Trust facilities.

- Consider re-assessing the 250m boundary around the existing quarry at Totternhoe to protect possible additional sources of Totternhoe Stone.

The Bedfordshire Strategic Stone Study acknowledges that at present there is only one working stone quarry – Totternhoe – in the Plan area, which provides small quantities of stone for restoration. The Study does not identify any further sources of Totternhoe Stone, and therefore there is insufficient evidence that could be used to justify an extension to the MSA.

- MSA designation would affect the AONB and SSSI designation of the Dunstable Downs.

National guidance stresses that Mineral Safeguarding should not be curtailed by other planning designations, such as urban areas and environment designations (including AONB and SSSIs) without sound justification. Defining MSAs alongside cultural and environmental designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning considerations.

Recommended changes:

- No change necessary.
- No change necessary to Chalk MSA, but amend wording to draft Policy MSA 1.
- No change necessary.
- No change necessary.

Cornbrash Limestone safeguarding options

| Name | Organisation | Representation |
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| Mr Binns | Ramblers Association | <p>Cornbrash Limestone.</p> <p>Q4. Your preferred option is (B) i.e. to safeguard only the mineral site MD18, Bury Farm, Pavenham.</p> <p>We suggest a better option is (C), whereby the whole resource is safeguarded and areas of high landscape value are protected from non mineral development.</p> |
| Mr Gilbert Wooldridge | English Heritage | <p>We consider that the safeguarding of minerals can have positive implications for the historic environment in terms of identifying and protecting building and roofing stone that can be used for historic buildings. This follows advice in Annex 3 of Mineral Policy Statement 1, which recommends that mineral planning authorities safeguard important sources of building and roofing stone for conservation purposes.</p> <p>In response to the government's 2004 Symonds Report "Planning for the Supply of Natural Building and Roofing Stone in England and Wales" (which considers the issue of how to identify appropriate sources of building stone), English Heritage has commissioned the British Geological Survey (BGS) and local geological teams to produce the Strategic Stone Study (SSS). The study is gradually producing datasets and building stone atlases for each county in England which are being provided to mineral planning authorities and other relevant organisations (for more information on the study, see www.bgs.ac.uk/mineralsuk/mines/stones/eh_project.html)</p> <p>Bedfordshire is one of only 13 counties in England to have been completed in terms of the Strategic Stone Study. The Bedfordshire Building Stone Atlas (attached to this letter and also available via the above page of the BGS website) outlines the county's building stone types and where they are found, with examples of specific historic buildings and structures. The datasets which identify building stone quarries and specific historic buildings are attached as spreadsheets, although these are not available on the BGS website.</p> <p>The SSS data spreadsheets identify eight types of building stone found within the county, with 136 historic buildings/villages recorded. Perhaps of greatest significance (in terms of mineral safeguarding areas), the spreadsheets reveal that there are 22 quarries within Bedfordshire that currently produce, or have the potential to produce, building stone for conservation purposes. This includes Totternhoe (for chalk) and Pavenham</p> |

| Name | Organisation | Representation |
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| | | <p>(for limestone), but there are other building stone quarries / sources within the county. A key issue for the Minerals Local Development Framework to consider is whether additional areas need to be safeguarded based on the datasets. This requires further assessment to ascertain whether it is prudent, practicable and beneficial to the historic environment to safeguard additional building stone sources.</p> <p>It should be noted that while we support the identification of mineral safeguarding areas for conservation purposes, any decision on specific proposals for building stone extraction would need to balance the benefit of extracting the stone for conservation purposes versus the potential harm to the surrounding historic environment, including designated heritage assets and their settings (for example, the environmental effects of quarrying on the setting of a nearby listed building). English Heritage’s position on minerals planning can be found at: www.englishheritage.org.uk/professional/advice/advice-by-topic/landscape-and-areas/mineralsplanning/, which includes our advice document on “Minerals Extraction and the Historic Environment”.</p> <p>Cornbrash Limestone Options</p> <p>The consultation document states that the preferred option for safeguarding Cornbrash Limestone is to safeguard only the mineral site allocation MD18 at Pavenham. We welcome the councils’ intention to safeguard this site to provide limestone for local building conservation purposes and hope that any negative environmental impacts can be addressed. We note that the limestone safeguarding area overlaps with the larger sand and gravel safeguarding area, which technically gives extra protection to the limestone resource, although the Pavenham site would be located in a disused quarry where sand and gravel has presumably already been extracted.</p> <p>In terms of other limestone sources, the Strategic Stone Study data spreadsheet identifies a number of other quarry locations. Many of these sites are now located near to or within settlements, so may have issues regarding further extraction, although Turvey Stone to the north of the village of Turvey is in the open countryside (as shown on Map 2). It would be advisable to consider whether any of these quarry sites contain significant levels of building stone that would merit safeguarding. The Turvey Stone site is thought to be the</p> |

| Name | Organisation | Representation |
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| | | source of the stone used by many of the buildings in Turvey (which includes a conservation area, over 60 listed buildings and a scheduled bridge), so there might some justification in safeguarding this site for its limestone resource (although we note it is to be safeguarded for sand and gravel purposes). |

Cornbrash Limestone: summary of representations with recommended changes

Explanatory note:

Cornbrash Limestone has been worked on a small scale in the past to the north-west of Bedford, and this has given the villages of the Upper Ouse their distinctive appearance, and is therefore a valuable resource which could be used in building restoration and conservation work.

Summary of representations and recommended responses:

- Support for safeguarding this mineral, but it should be considered whether additional areas need to be safeguarded.

Cornbrash Limestone is known to occur beneath the river valley sands and gravel the valley of the Great Ouse in the north-west of the Plan area which are protected by the sand and gravel safeguarding area (see 'Map 3'). Since this sand and gravel resource area will be safeguarded, it makes sense to extend the limestone MSA to cover this same area.

Recommended changes:

Amend the Limestone MSA to match the Sand and Gravel MSA in the Upper Ouse Valley.

Oxford Clay safeguarding options

| Name | Organisation | Representation |
|-----------|----------------------|---|
| Mr Binns | Ramblers Association | Oxford Clay. Q5. We have no objection to your option (B). Although brick making has ceased in the Marston Valley there may in the future be a need for access to limited supplies of high quality clay. |
| Mr Maison | British Waterways | It is difficult to pinpoint clearly the opportunities for such synergy in the proposed Minerals Safeguarding Areas under the Oxford Clay section as development and or mineral extraction could both provide opportunities for the creation of parts of the waterway. As you know, the BMK waterway is enshrined in major policy documents such as the core strategy of the relevant local authorities. However, that opportunity should be kept in mind. |

Oxford Clay: summary of representations with recommended changes

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| <p>Explanatory note:</p> <p>Oxford Clay has until recently been the source of a vital building material and of great economic importance.</p> |
| <p>Summary of representations and recommended responses:</p> <p>Preferred option is supported.</p> |
| <p>Recommended changes:</p> <p>None</p> |

MSA 1: Exempt Surface Development

| Name | Organisation | Representation |
|--------------|---|--|
| Mr Wooldrige | English Heritage | <p>Policy MSA1: Exempt Surface Development</p> <p>We have no objection to a policy listing classes of planning application that would be exempt from safeguarding policies. It might be appropriate to include Listed Building Consent to the list, as all LBC applications involve works to existing buildings. Some definition of “miscellaneous minor applications” might be needed, as this is rather vague.</p> |
| Mr Hickman | Southill Parish Council | <p>MSA1 should explicitly exempt developments within the curtilage of existing residential and business properties. Developments in these areas should be subject to the usual planning regulations but not additionally against the minerals safeguarding policy. The proposed MSA1 exempts extensions and infill, but extra building on isolated rural properties is neither of these and would therefore require the pointless and costly bureaucracy of being assessed against a minerals safeguarding policy. That would be unfair to the applicant and a waste of Council Tax payers’ money.</p> |
| Mr Hurley | Sibelco | <p>Sibelco UK is of the view that under the second bullet point, there should be no exemption for infilling development within 250 metres of sites put forward for</p> <p>consideration as part of the Minerals and Waste Local Development Framework – not only (as noted) within 250 metres of an existing permission for mineral extraction/waste disposal. The inclusion of a 250 metre “buffer zone” around sites put forward as part of the Minerals and Waste Local Development Framework would provide an appropriate stand-off in the event of subsequent mineral development which may otherwise be compromised by such infill non mineral development. MSA’s should define not only the mineral resources but also the areas required to safeguard the mineral in its entirety, including consideration of preventing non mineral development adjacent to a mineral resource.</p> |
| Mr Warren | Heaton Planning (on behalf of Lafarge Aggregates) | <p>We are supportive of the approach within Policy MSA1. The Policy allows for minor development to take place and should afford sufficient protection to avoid the unnecessary sterilisation of mineral resources.</p> |

MSA1: summary of representations received with recommended changes

Explanatory note:

This draft Policy defines how Mineral Safeguarding will take place within the planning system.

Summary of representations and recommended responses:

- Add Listed Building Consent to list of exempt surface development.

Applications for Listed Building Consent would not sterilise mineral resources.

- Add a definition of "miscellaneous minor applications".

Clarification would be useful for developments where this Policy would apply.

- Add exemption for developments within the curtilage of existing residential and business properties.

Developments within the curtilage of existing properties are not introducing new uses which could sterilise mineral resources.

- How will isolated rural dwellings be considered by this Policy?

Small scale developments will be considered on a case-by-case basis in respect of their likely scope for needless sterilisation.

- Should infilling development within 250 metres of mineral sites put forward for consideration as part of the MWDF be exempt?

Adjacent development could sterilise potential mineral sites by coming within 250 metres of them. It is therefore appropriate that the Minerals Planning Authority should be consulted on all proposals (as per MSA1) within 250 metres of mineral sites which have reached Submission stage or later.

Recommended changes:

- Add Listed Building Consent to the list of exempt surface developments.
- Insert a footnote referring to specific parts of the GPDO.
- Amend - Add exemption for developments within the curtilage of existing residential and business properties.

- None
- Remove exemption.

MSA 2: Mineral Resource Assessment

| Name | Organisation | Representation |
|---------------------------------|---|--|
| Mr Hurley | Sibelco | <p>Sibelco UK supports the proposal that any application for non mineral development in a MSA must be accompanied by a Minerals Resource Assessment. Due to the specialist requirements for the interpretation of some minerals, in particular for industrial minerals, Sibelco UK proposes and amendment to the wording of Policy MSA 2</p> <p>“ accompanied by a Minerals Resource Assessment - undertaken by a suitably qualified and experienced professional with knowledge of the nature, extraction, processing and specifications of the mineral type present – which establishes through site specific geological survey data”.</p> <p>Sibelco UK believes that such a policy wording will ensure that all mineral types are properly assessed and capable of independent verification. It is important that the process of mineral resource assessment by an applicant for non mineral development in a MSA is seen to be completely open and transparent.</p> |
| Northamptonshire County Council | NCC Planning Policy | Agree |
| Mr Warren | Heaton Planning (on behalf of Lafarge Aggregates) | We are supportive of the approach being promoted within Policy MSA2. The approach will ensure that a proper assessment of the mineral resource is undertaken prior to potentially sterilising development. |

MSA2: summary of representations received with recommended changes

Explanatory note:

This draft Policy sets out how Mineral Safeguarding will operate in practise.

Summary of representations and recommended responses:

- Amendment to wording of Policy is proposed: “accompanied by a Minerals Resource Assessment - undertaken by a suitably qualified and experienced professional with knowledge of the nature, extraction, processing and specifications of the mineral type present – which establishes through site specific geological survey data”.

Disagree - the additional wording is an unnecessary level of detail.

Recommended Changes:

None - Retain original Policy wording.

MSA 3: Surface development within an MSA

| Name | Organisation | Representation |
|--------------------------|---|--|
| Mr White | Chilterns Conservation Board | 3. Policy MSA3 deals with development within an MSA. The latter part of the policy states that prior extraction of the mineral should take place subject to 'the environmental impacts of mineral extraction'. The Board understands the apparent meaning of this but considers that this part of the policy is not clearly worded at present. We suggest that this part of the policy should be reworded to make it clearer, and think that it could state that 'the mineral planning authority will seek prior extraction of that mineral subject to the provision of satisfactory information including a full assessment and acceptability of: ... the environmental impacts of mineral extraction'. |
| Mr Hurley | Sibelco | <p>Policy MSA 3</p> <p>Sibelco UK would welcome clarification of what is meant in the first bullet point by "poor quality". Is it intended that a Mineral Resource Assessment only needs to show that a mineral is of "poor quality" in order for non mineral development within a MSA to potential gain approval?</p> <p>A Mineral Resource assessment should be a thorough and comprehensive assessment of all relevant aspects of the mineral resource present within the site.</p> |
| NCC Planning Policy team | Northamptonshire County Council | Agree overall, however the term 'poor quality' (1st para, 1st bullet point) could be subjective, also mineral of poorer quality can be used for lower-grade end use. Alternatively parameters identifying what 'poor quality' is for different mineral types could address this point and provide clarification. |
| Mr Purton | David Lock Associates on behalf of Brooklands | <p>Question – MSA 3: Surface development within a MSA</p> <p>Do you agree or disagree? Is there an alternative approach which would be more appropriate?</p> <p>We are concerned that the document does not adequately set out measures to mitigate the negative impact that HGV traffic as a result of new surface development, mineral extraction or reinstatement/landfill would place on neighbouring residential developments. We feel this must be articulated more clearly within the document to ensure that decisions are made on a sound empirical base. Failure to do this is likely to result in the challenge of an unsound plan.</p> |

MSA: Consultation representations and recommended responses (June 2011)

| Name | Organisation | Representation |
|-----------|---|--|
| Mr Warren | Heaton Planning (On behalf of Lafarge Aggregates) | We are supportive of the approach being promoted within Policy MSA3. |

MSA3: summary of representations received with recommended changes

Explanatory note:

This draft Policy sets out more detail on how Mineral Safeguarding will take place in practise.

Summary of representations and recommended responses:

- Amendment to wording of policy is proposed: "the mineral planning authority will seek prior extraction of that mineral subject to the provision of satisfactory information including a full assessment and acceptability of: ... the environmental impacts of mineral extraction".

Agree

- Clarification is sought. Define "poor quality" in bullet one of the policy.

Disagree - Further definition would be too restrictive, and outside the scope of the policy document. The quality of any mineral present will be assessed and interpreted on a case by case basis.

- Is it intended that a Mineral Resource Assessment only needs to show that a mineral is of "poor quality" in order for non mineral development within a MSA to potential gain approval? ("Poor qualify" mineral can be used for lower-grade end use etc).

Disagree - It is asserted that an applicant only needs to show that a mineral is of "poor quality" in order for non mineral development within a MSA to gain approval. However, the assessment in MSA3 includes a number of other criteria, of which "poor quality" is only one consideration.

Recommended Changes:

- Amend text as follows: "the mineral planning authority will seek prior extraction of that mineral subject to the provision of satisfactory information including a full assessment of: ... the environmental impacts of mineral extraction".
- None
- None

General representations

| Name | Organisation | Representation |
|-----------|--|--|
| Mrs Smith | Bedfordshire Council's Planning Consortium | Overall BCPC agrees that safeguarded land is better than having no safeguard in place and is preferable to specific sites being chosen or sites being put forward by the mineral industry. |
| Mr Benn | Environment Agency | <p>Thank you for consulting us on the Minerals Safeguarding Areas Consultation.</p> <p>We do not have any comments on the general strategy for safeguarding mineral deposits. We will have site specific concerns which will be applied on a case by case basis.</p> |
| Mr Maison | British Waterways | <p>Thank you for your consultation.</p> <p>British Waterways has the Grand Union canal running through the extreme south west of the County for 6 km through Leighton Buzzard and its northern and southern sides. There can be advantages both for minerals and for British waterways to have a mineral site nearby and linked to the canal by creating a marina should the restoration plans consider the restoration of a mineral site for water based activities, including recreation.</p> <p>In addition, BW is a supporter and a partner for the proposed Bedford Milton Keynes waterway. Clearly there is a potential for synergy between the creation of part of this waterway by using mineral extraction to provide for construction of the route of the waterway either as a narrow strip or as a lake/nature reserve etc. This synergy has been seen in an imaginative way with the proposals for the Marston Valley Innovation Park near Wotton.</p> |
| Mr Hurley | Sibelco | <p>Sibelco UK response to Consultation on Mineral Safeguarding Areas (ends 10th April 2011)</p> <p>Sibelco UK welcomes the opportunity to comment on the consultation document on Mineral Safeguarding Areas. Competing land use pressures make it imperative that the location of mineral resources are understood and documented appropriately to ensure such mineral resources are not sterilised by other forms of development.</p> |

| Name | Organisation | Representation |
|------|--------------|---|
| | | <p>Sibelco UK comments are as follows by reference to paragraph numbers in the consultation document:</p> <p>Paragraph 2.5</p> <p>Sibelco UK welcomes the intention that Mineral Safeguarding Areas (MSA's) will seek to “ ensure that mineral resources of potential, imminent, or future interest are adequately and effectively considered in land-use planning decisions”. Sibelco UK does question the use of the term “economically valuable”. Sibelco UK suggests that terminology used elsewhere in the consultation document and used on page 8 of the British Geological Survey Guide to Mineral Safeguarding (October 2007) - i.e. the term “economic importance” is more appropriate and better reflects the intention of the mineral safeguarding process.</p> <p>MSA Policies – General Points</p> <p>Sibelco UK is of the view that the MSA policies should draw distinction between those parts of the MSA which coincide with an extant mineral consent and sites put forward for consideration as part of the Minerals and Waste Local Development Framework on the one hand – and those areas of the MSA which fall outside these two categories.</p> <p>The policy considerations of MSA 1, MSA 2 and MSA 3 are for the most part only relevant for those areas of a MSA which lie outwith extant permissions and sites put forward for consideration as part of the Minerals and Waste Local Development Framework. Implementation and Monitoring</p> <p>Table 2</p> <p>The text of Table 2 makes several references to “Applicants will be required to obtain site specific geological survey data”.</p> <p>Other parts of the consultation document refer to the requirement for an applicant for non mineral development within a MSA to provide a Mineral Resource Assessment</p> |

| Name | Organisation | Representation |
|----------|------------------------------|--|
| | | <p>to the Planning Authority. Sibelco UK is of the view that Table 2 should refer to the securing of site specific geological survey data and the preparation and submission of a Mineral Resource Assessment since the geological survey data is only one component of the Mineral Resource Assessment. The Mineral Resource Assessment will report the findings of the surveys and assess the quality, quantity, overburden ratios, assessed viability of the mineral resource etc. Miscellaneous</p> <p>Gault Clay</p> <p>Sibelco UK notes that Gault Clay is noted only in paragraph 4.3 as being of “ relatively low economic value “ and it being “ questionable whether this resource should be safeguarded”. There is, however, no further reference to the Gault Clay or justification why this mineral has not been safeguarded.</p> <p>Note on Mineral Consultation Areas</p> <p>Unlike Mineral Safeguarding Areas, Mineral Consultation Areas (MCA's) are not obligatory but MCAs are useful in protecting developments associated with minerals such as railway depots and wharfs. MCAs should only be used in conjunction with defined MSAs.</p> <p>Minerals and Waste Local Development Framework Review</p> <p>Sibelco UK supports a review of the Minerals and Waste Local Development Framework within five years of its adoption and recommends that the MPA makes such a review a strategic objective.</p> |
| Mr White | Chilterns Conservation Board | <p>Conservation Boards</p> <p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> |

| Name | Organisation | Representation |
|---------|--------------|---|
| | | <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty.</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore “A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty.”</p> <p>Section 85 of the CRow Act states under “General duty of public bodies etc”</p> <p>“(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”</p> <p>The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board’s Planning Committee which meets on 25th May 2011. Any further comments made at that meeting will be duly forwarded.</p> |
| Mr Munn | | <p>Good afternoon,</p> <p>Thank you for informing us about your mineral safeguarding proposals. I agree in each case with your preferred options. However, with specific reference to the phrase in the proposals:</p> <p>‘Excluding areas already overlain by settlements and other built developments’</p> |

| Name | Organisation | Representation |
|---------------|----------------------|---|
| | | <p>Can you clarify for me that this would include the gardens/farmyards etc of isolated properties, farmhouses, barns, etc. In other words, would this prevent, or could it be used to prevent, permission being granted for an extension to a dwelling or a new dwelling/outbuilding/barn being erected within the curtilage of an existing farm yard or garden?</p> |
| Mr Berry | | <p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on it at this stage.</p> |
| Mr Binns | Ramblers Association | <p>Mineral Safeguarding Areas Public Consultation</p> <p>Preservation and access to the countryside are two of the stated aims of The Ramblers' Association and with these aims in mind we have previously commented on the Bedfordshire Minerals and Waste Local Development Scheme and the Combined Minerals and Waste Core Strategy.</p> <p>In this particular context, the preservation of the countryside is best achieved through the rigorous control of development (outside of existing settlements) and mineral extraction.</p> <p>It is appreciated that development could take place after minerals have been extracted but this would be a matter for future planning consultations to which Ramblers could respond.</p> <p>The Ramblers' Association has no comments to make on your policies MSA 1, MSA 2 and MSA 3.</p> |
| Mr Wooldridge | English Heritage | <p>Sustainability Appraisal</p> <p>Is the combined waste and minerals SA framework shown as Table 2.1 appropriate for assessing minerals and waste planning documents in Bedfordshire and Luton?</p> <p>English Heritage has produced guidance on Sustainability Appraisals and the historic environment (see: www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1302256050), which we hope is of interest and use.</p> |

| Name | Organisation | Representation |
|------|--------------|---|
| | | <p>In terms of the SA Framework shown in Table 2.1, the cultural heritage objectives and questions could be improved to make them more specific. The first objective is not particular clear or inclusive; “areas” potentially excludes buildings, sites, monuments etc, whilst “archaeological, cultural and historic” potentially excludes architecture, landscapes etc. It would be better to use terminology found in Planning Policy Statement 5 in respect of “heritage assets” and “designated heritage assets”</p> <p>(see PPS5 Annex 2 for definition). Reference to settings would also be advisable, as this can form an important component of a heritage asset and development within the setting of an asset can be harmful (see PPS5 again). The first objective could therefore be reworded as follows “To identify designated heritage assets and other important heritage assets and seek to avoid, preserve or enhance them and their settings”.</p> <p>The first question could be amended in a similar way to refer to “heritage assets” rather than just sites of built and archaeological heritage (i.e. “Seek to preserve and where relevant enhance heritage assets?”). The second question could also refer to designated heritage assets rather than sensitive sites, which is more specific and aims to avoid those heritage assets considered to be of greatest importance and sensitivity. Finally, it is not clear what is meant by “historic environment character and opportunity areas” in the third question. Presumably this refers to those identified by Bedfordshire County Council in document such as the Bedfordshire</p> <p>Green Infrastructure Strategy, but this needs to be clarified.</p> <p>Do you have any comments on the results of the appraisal?</p> <p>We welcome the recognition of positive impacts on cultural heritage with regards to</p> <p>Option B for limestone (due to the opportunity to benefit historic building conservation). The same argument could be made for those options which safeguard the Totternhoe Stone quarry in terms of building stone supply, and could potentially apply to the relevant options for Woburn Sands too. The appraisal is correct to identify uncertain effects with some of the safeguarding options, as it depends on whether specific sources are extracted with specific impacts on the historic environment. It is hope that any negative environmental impacts of Option B for limestone can be mitigated to ensure the supply of building stone.</p> |

Table 1

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| <p>Explanatory note:</p> <p>These comments do not refer to specific Policies or paragraphs.</p> |
| <p>Summary of representations and recommended responses:</p> <ul style="list-style-type: none">• Paragraph 2.5: amend text from "economically valuable" to "economic importance" to conform with BGS guidance. <p><i>Agree - amend paragraph 2.5 to refer to minerals of "economic importance".</i></p> <ul style="list-style-type: none">• MSA areas: Distinguish those areas within an MSA which fall outside extant permissions and sites put forward for consideration as part of the MWDF - MSA policies 1 - 3 are for the most part only relevant to those areas. <p><i>Disagree - all strategic sites will be identified in the overall plan which will accompany the final Minerals and Waste Core Strategy, and this will include MSAs.</i></p> <ul style="list-style-type: none">• Monitoring and implementation: amend Table 2 to refer to "securing of site specific geological survey data and the preparation and submission of a Mineral Resource Assessment" since geological survey data is only one component of the Mineral Resource Assessment. <p><i>Agree - this will expand what the Plan seeks to achieve, and will provide clarification.</i></p> <ul style="list-style-type: none">• Gault clay: Paragraph 4.3 refers to Gault, but there is no further reference to it or justification why this mineral has not been safeguarded. <p><i>Agree - Land to the south of Arlesey has a ROMP for extraction of Gault Clay, and could be safeguarded by the addition of a 250 metre buffer. This is comparable to the approach used in safeguarding the Chalk resource.</i></p> <ul style="list-style-type: none">• SA framework: cultural heritage objectives could be improved to make them more specific. <p><i>Agree - Comments regarding the Sustainability Appraisal (SA) will be passed on to ENVIRON who undertake the SA of the Minerals and Waste Development Framework.</i></p> |
| <p>Recommended Changes:</p> |

- Amend paragraph 2.5.
- None.
- Amend text in Table 2 as suggested.
- Create MSA for Gault Clay around the Arlesey site.
- Forward comments to ENVIRON.