

The Way Forward  
Planning Services  
Northamptonshire County Council  
Guildhall Road Block  
County Hall  
Northampton  
NN1 1DN



Our ref: NCC  
Partial Review  
Date: 22<sup>nd</sup>  
August 2012

Dear Sirs

**Consultation on the way forward: Partial Review of the  
Northamptonshire Minerals and Waste Development Framework**

I am responding to your consultation concerning the Partial Review of the Northamptonshire Minerals and Waste Development Framework on behalf of the Minerals and Waste Planning Shared Service for Bedford Borough, Central Bedfordshire, and Luton Borough Councils.

It is noted from your consultation document that Northamptonshire is to 'update specific areas of the Minerals and Waste Development Framework to reflect changes in local circumstances and in Government guidance'. You also refer to the intention to roll all of the existing DPDs into one document. In addition, Northamptonshire has revisited the waste aspect of your MWDF in advance of the publication of the National Waste Management Plan, which is expected to take place in 2013. You will also be aware of the recent meeting involving a representative from your planning policy team, and from other authorities nearby, concerning the 'Duty to Co-operate', at which your Council was invited to raise matters for discussion. This was an opportunity to discuss the content of the Northamptonshire Partial Review consultation prior to the formal public consultation, but this was not brought forward by the officer attending that meeting, except to mention that the Partial Review was about to take place.

Chapter 2 is concerned with mineral supply. Of interest is that Northamptonshire intends to reduce its sand and gravel aggregate apportionment by 0.45MT tonnes, which equates to an approximate reduction of 50%. The National Planning Policy Framework states that "MPAs should plan for a steady and adequate supply of aggregates by preparing an annual local aggregate assessment, either individually or jointly by agreement with another or other MPAs, based on a rolling average of 10 years sales data **and other relevant local information.**" Given the significance of the proposed reduction the Minerals and Waste Planning Shared Service request that the 'other local relevant information' used to calculate



Central Bedfordshire Council, Bedford  
Borough Council and Luton Borough Council

**working together**

Chapter that the terminology used is not explained. For example, at paragraph 3.10 you use the expression 'treated via energy from waste'. Do you mean that this waste was managed by energy from waste process? Clarity of expression is particularly important, as well as consistency with European Union legislation.

In addition, to refer to 'Commercial and Industrial' wastes together as the sources of hazardous wastes is to miss the point- all areas of the UK produce some hazardous waste, especially from the redevelopment of contaminated land, and specific industrial activities.

What is meant by referring to 'Advanced Treatment' at paragraph 3.34? By contrast, Table 7 ('Indicative waste management and disposal capacity requirements in millions tonnes') divides capacity into: *Recycling, Biological Processing, Inert Recycling, Treatment (again, not defined or explained), Inert Recovery/clean fill, Landfill, Haz Recycle, Haz tmt, and Haz landfill*. There is no Glossary of or explanatory list to these terms and abbreviations. What is meant by biological processing? What is 'Treatment'?

Paragraph 3.35 states that there is: *'a marked difference from the MWDF, this is because recent surveys have provided a better picture of waste arisings and their fate.'* The Shared Service requests that the information supporting your Partial Review be

made publically available.

**Issue 2: No**

Concerning Hazardous wastes, linking your provision to Commercial and Industrial waste output is inappropriate. Most hazardous wastes arise from the redevelopment of contaminated land, as well as specific industrial activities, but not from offices or retail space. Equally, you make reference to using a 'conservative approach' with respect to Construction Demolition and Excavation waste, but provide no explanation of what this terminology means.

It is not at all clear whether Figure 5 refers to local arisings and disposal capacity, or national arisings and disposal capacity. There is also an application for an extension at the Kings Cliffe Facility (East Northants Waste Facility) which is not referred to, and

**Central Bedfordshire Council**

Priory House, Monks Walk  
Chicksands, Shefford  
Bedfordshire SG17 5TQ

**Telephone** 0300 300 8000

**Email** [customer.services@centralbedfordshire.gov.uk](mailto:customer.services@centralbedfordshire.gov.uk)  
[www.centralbedfordshire.gov.uk](http://www.centralbedfordshire.gov.uk)



Central Bedfordshire Council, Bedford  
Borough Council and Luton Borough Council

**working together**

The provision of waste management capacity for your own waste planning area is supported, as well as the use of catchment area restrictions. However any further development of this approach in relation to sustainable transport would need to be carefully derived and justified by evidence.

**Issue 7: Yes, with caution expressed.**

Policies CS13 and CMD13 could be merged and their existing aims brought together into a single policy.

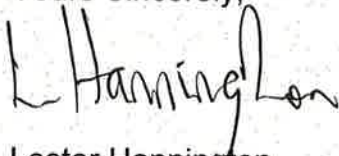
**Issue 8: Yes**

The impacts of mineral extraction and of waste management developments are subject to evolving controls, such as the recent introduction of controls over mine wastes. However some issues have been developing as issues for planning control, such as the risk of bird strike on overflying aircraft, and slope stability, which are set out in the National Planning Policy Framework. It would be appropriate for the Partial Review to address these issues.

**Issue 9: Yes.**

I hope this is of assistance to you.

Yours Sincerely,



Lester Hannington

Principal minerals and Waste Planning Officer  
Minerals and Waste Planning Shared Service  
Direct Line: 0300 300 6219  
Priory House, Monks Walk, Chicksands, Shefford, SG175TQ  
[Lester.Hannington@centralbedfordshire.gov.uk](mailto:Lester.Hannington@centralbedfordshire.gov.uk)

**Central Bedfordshire Council**

Priory House, Monks Walk  
Chicksands, Shefford  
Bedfordshire SG17 5TQ

**Telephone** 0300 300 8000

**Email** [customer.services@centralbedfordshire.gov.uk](mailto:customer.services@centralbedfordshire.gov.uk)  
[www.centralbedfordshire.gov.uk](http://www.centralbedfordshire.gov.uk)



Central Bedfordshire Council, Bedford  
Borough Council and Luton Borough Council

**working together**