

Northamptonshire Minerals and Waste Local Plan  
Submission  
Statement of Consultation and Engagement  
Regulation 22 Statement  
November 2013

## Role of the Statement of Engagement and Consultation

When a Local Plan, in this case the Northamptonshire Minerals and Waste Local Plan, reaches submission stage, there is a requirement to prepare a formal statement such as this Statement of Engagement and Consultation.

In line with the requirements set out in Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations this statement sets out:

- Who was invited to be involved in plan preparation,
- How they were invited to be involved in the plan preparation, and
- A summary of the main issues raised and how they have been addressed.

The following sections set out how this has been undertaken in relation to the Northamptonshire Minerals and Waste Local Plan.

## Background to the Partial Review

Northamptonshire County Council is the minerals and waste planning authority for the whole of Northamptonshire. This means that it is responsible for all matters associated with minerals and waste development, including setting the land use policies and determining planning applications for such development. Decisions on planning applications should be made on the basis of having an up-to-date statutory development plan. This is a plan that sets out strategy, provision, policies and sites for minerals and waste development. Northamptonshire has such a plan; the Minerals and Waste Development Framework (MWDF)

Government guidance, the National Planning Policy Framework (NPPF), says that planning authorities should have and maintain an up-to-date plan. Although the MWDF was only fully adopted in September 2011 it required review to ensure that it remains up-to-date. This review was not proposed to be a full review of all elements of the current MWDF but only those that require it - this is why it was referred to as a "Partial Review". As Government guidance now refers to Development Plans or Frameworks as "Local Plans" the MWDF following the review will be branded as the Northamptonshire Minerals and Waste Local Plan (MWLP).

The Partial Review has concentrated on:

- A revision to provision figures for aggregates and waste capacity, taking these through to 2031.
- The inclusion of any new or amended policies that will be necessary to reflect changed national guidance, in particular the NPPF.
- The development of a policy for matters not fully covered in the current MWDF.

The following matters were not proposed to be covered:

- Any revisions to the spatial strategy for waste and minerals.
- Any changes to minerals and waste allocations and designations.

## Consultation on the Way Forward

The purpose of the “Consultation on the way forward” document was to encourage discussion on how it was best for Northamptonshire to precede with the review. The document identified nine key issues for discussion.

- Issue 1: Identifying Northamptonshire’s aggregate apportionments
- Issue 2: Identifying Northamptonshire’s waste management needs
- Issue 3: Addressing low level radioactive waste (LLW)
- Issue 4: Existing spatial strategy, site allocations and specific development policies (and where no change was proposed)
- Issue 5: Addressing climate change
- Issue 6: Development requirements for neighbourhood waste management facilities
- Issue 7: Encouraging sustainable transport movements
- Issue 8: Ensuring high standards for restoration and after-use
- Issue 9: Minimising impacts of minerals and waste development

The consultation period for this document ran from 28 June to 23 August 2012. Documents also published alongside the way forward document for consultation included the (draft) Local Aggregate Assessment, Local Assessment of Waste Management Needs, Sustainability Appraisal Scoping Report, Habitats Regulations Screening Matrix, as well as an updated version of the Statement of Community Involvement.

Notifications at the start of the consultation were sent to approximately 1,000 contacts on our mailing list. At this stage everyone was sent a letter, which also included a form for people to request to be contacted during future consultations by either letter or email or if appropriate to be removed from the list. The list below shows the make-up of our mailing list and includes the numbers of contacts in each category.

Adjoining Authorities	34
Adjoining Parishes	85
Agents	90
Business Groups	31
Community Residents Groups	71
County Bodies	5
Developers	31
Duty to Co-operate Authorities*	70
Education	9
Environmental Groups	24
Faith, Race, Gender and Disability Groups	42
Government	12
Government Bodies	24
Health	18
Industry – Waste	38
Industry – General	5
Industry – Minerals	25
Infrastructure / Utilities	37
Joint Waste Strategy	12
Landowners	21
Members of Parliament/ Members of European Parliament	14
Minerals and Waste Organisations	14
Northamptonshire County Councillors	73
Northants Districts and Boroughs	15
Parish Councils	275

Private Individuals	8
SEA Consultation Bodies	9

\* Duty to Co-operate Authorities are all the other minerals and waste authorities in England and Wales.

The notification letters stated that copies of the documents could be forwarded on request, but also that documents could also be viewed at Northamptonshire County Council Libraries, Northamptonshire Council receptions and District and Borough receptions. The full documentation was also placed on the County Council website and the County Councils online consultation system.

The consultation was also listed on the County Councils central consultation database. As this consultation was published on the list a notification was sent to all those registered to receive information on consultations, it also triggered a tweet to be published on the County Council twitter account.

In total 28 responses were received with four more specifically making no comment. The number of responses was small but this was expected as the document did not cover specific sites. Most responses received were in relation to the proposal to reduce the annual aggregate apportionment to a ten year annual average for sand and gravel. These responses mainly came from the minerals industry and other minerals planning authorities. There were also a number of responses in relation to low level radioactive waste (LLW); opinion was divided over the best locations for disposal of LLW. Other responses received generally supported the options outlined in the Way Forward Document.

Some responses suggested wording and amendments and points of clarification and these suggestions have been included in the document in a number of cases. Additional amendments made as part of the partial review process include providing more information in relation to climate change, changing development thresholds and linking sustainable transport movements to waste catchment areas.

A summary of the responses and the suggested amendments are included as Appendix 1

## Draft Minerals and Waste Local Plan for consultation

The Draft Minerals and Waste Local Plan for consultation (the equivalent of a preferred options stage) was published on 17 January 2013 and consultation ran for a period of eight weeks until 14 March 2013. The Draft Plan, brought all four of the MWDF documents together into one document and included updates due to national policy as well as changes suggested as a result of the Way Forward Consultation. To highlight the changes made from the adopted documents, any proposed new or changed parts were underlined or crossed out.

As with the Way Forward Consultation, all documents were published on the County Council website and the Council's online consultation system. The consultation was listed on the County Councils central consultation database, which on publication notified further stakeholders and published a tweet on the Council's twitter feed. Those that were notified during the Way Forward consultation were notified again, although this time, most of the contacts were notified via email rather than letter, and this email provided a direct link for stakeholder to access all the documents. Stakeholders could again request copies of the documents and again documents could be viewed at NCC and District and Borough receptions and NCC libraries.

Documents that were published for consultation in support of the Draft Minerals and Waste Local Plan included a Sustainability Appraisal Environmental Report, Sustainability Appraisal

Scoping Report, Habitats Regulations Assessments Scoping Report, Local Aggregate Assessment for Northamptonshire, Local Assessment of Waste Management Needs, Strategic Flood Risk Assessment Summary and Habitats Opportunity Mapping Report.

In total 38 responses were received, providing a total of 129 separate comments (a further seven organisations provided a response of no comment). Responses received came from environmental groups, English Heritage, minerals and waste industry, town and parish councils and county councils. The main topics that the majority of respondents commented on were the minerals provision rates and hazardous waste. For the minerals provision rates the main concern was the reduction from previous apportionment levels for sand and gravel, most organisations accepted the ten year average as set out in government guidance but felt that further consideration should be given to other circumstances, especially as Northamptonshire is a growth area. The concerns raised over hazardous waste issues were around the clarification of waste categories, changes in terminology and the use of the East Northamptonshire Resource Management Facility. Other comments received expressed support for a variety of sections within the document.

The representations can be viewed online at:

<http://edit.northamptonshire.gov.uk/en/councilservices/Environ/planning/policy/minerals/Documents/PDF%20Documents/Cabinet%20Report.MWDF.Final%20Draft%20Plan.Appendix%201%20v2.July%202013.pdf>

## Minerals and Waste Local Plan: Final Draft Plan (Proposed Submission Document)

The Minerals and Waste Local Plan: Final Draft Plan (Proposed submission document) was published for consultation on the 5 September and consultation ran for a formal period of six weeks (but a further two week period beforehand finishing on 31 October 2013). The Final draft plan included amendments made as a result of the draft plan consultation, and was the document we considered should be adopted as the new Minerals and Waste Local Plan. As before changes from the adopted MWDF documents were highlighted.

The Final Plan consultation was carried out in the same way as the Draft Plan consultation, with stakeholders being notified by email and copies of the documents placed online and at libraries and receptions. All the supporting documents (updated and amended as appropriate) were again published alongside the Final Draft Plan, an Equalities Impact Assessment was also prepared at this stage.

In total 33 responses were received, providing a total of 148 separate comments (a further seven organisations provided a response of no comment). Responses came from county councils/other waste and mineral planning authorities, town and parish councils, agents, Environment Agency, Natural England, minerals operators, district and borough councils, Minerals Product Association, CPRE, Anglian Water, waste operators, Thames Water, Woodland Trust, English Heritage, NFU, Marine Management Organisation and a private individual.

Sections of the plan that received representations included waste capacity and the minerals provision rates. A small number of respondents highlighted the need for Northamptonshire to receive London's waste. There were also representations related to the reduced minerals provision although most respondents agreed with the ten year average it was felt that other relevant factors should also be considered to decide the provision figure.

Comments received also included points of clarification to make the document clearer and corrections of typographical errors. Comments also included support for the combining of the

documents and amendments that have previously been made as well as support for sites included in the plan.

The representations can be viewed online at:

<http://www.northamptonshire.gov.uk/en/councilservices/Environ/planning/policy/minerals/Pages/PartialReviewoftheMWDFLocalPlan.aspx>

## Conclusions

In moving towards submission of the Minerals and Waste Local Plan, the County Council considers it has complied in relation to consultation and engagement with that which is required under the regulations and in our adopted Statement of Community Involvement.

The engagement and consultation carried out has appropriately informed the content of the Minerals and Waste Local Plan.



## Appendix 1: Consultation on the Way Forward

Strategic issue and identified options	Summary of consultation responses	Preferred approach and Draft Plan policy
<p><b>Identifying Northamptonshire's aggregate apportionments</b></p> <p>The NPPF requires each MPA to calculate apportionments on the basis of average aggregate sales over a 10 year rolling period. Determining aggregate apportionments for the plan period on the basis of average sales over a 10 year period would result in a reduction in apportionments: from 0.97 Mtpa to 0.52 Mtpa for sand and gravel; and from 0.39 Mtpa to 0.35 Mtpa for crushed rock.</p> <p>The options identified included:</p> <ul style="list-style-type: none"> <li>Calculating aggregate apportionments based on a 10 year rolling period is an appropriate way forward for Northamptonshire.</li> <li>Calculating aggregate apportionments based on a 10 year rolling period but also including minor adjustments to reflect possible local circumstances e.g. having a higher figure for crushed rock to reflect sites coming forward</li> </ul>	<p>Total Comments: 17 7 Yes, 2 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>Apportionment should not simply be based on the 10 years sales figures. Other local factors should be considered.</li> <li>Large scale development in Northamptonshire will see large demand for Sand &amp; Gravel</li> <li>Further discussion should take place with the Aggregates Working Party.</li> <li>Regional figure has not been revoked so can be seen as premature.</li> </ul> <p>Environment Groups</p> <ul style="list-style-type: none"> <li>Due to economic climate a reduction would seem sensible solution.</li> </ul> <p>Government organisations</p> <ul style="list-style-type: none"> <li>Lower figure is sensible as minerals are a finite resource.</li> </ul> <p>Other Authorities</p> <ul style="list-style-type: none"> <li>Concerns over the decrease in apportionment despite the expected growth in housing, this could cause under provision.</li> <li>Concern that reduction in apportionment would put additional pressure on other councils.</li> <li>Concerns that rail heads, wharf, storage etc are not safeguarded.</li> <li>Sales figures over 10 years will still reflect growth ambitions.</li> </ul>	<p><b>Preferred approach:</b></p> <p>After consideration of responses received and after discussion with the East Midlands Regional Aggregate Working Party (RAWP), the decision has been taken to keep the lower apportionment figures that are based on the 10 year sales average, due to the downturn in production in the county.</p> <p>The Council has decided to proceed with 0.52Mtpa for sand and gravel and 0.35Mtpa for crushed rock. These figures are based on the 10 years sales average as set out in the NPPF.</p> <p>The County Council does not consider that for sand and gravel, that there is other relevant information that is of enough significance to reduce or increase the 10 year average figure.</p> <p>A figure of 0.52Mtpa for sand and gravel is roughly 150% over what has been produced over the last four years. Post-recession growth will need to be strong to reach these levels. This is due to long term reluctance of the minerals industry to come forward and implement site allocations.</p> <p>The limestone apportionment is proposed to be at the same level as in the adopted MWDF. This is because unlike for sand and gravel, there has not been a steady decline in sales and sites have been coming forward for permission and being implemented. Therefore it is proposed to have a provision figure for crushed rock that is slightly higher than the 10 year average.</p> <p><b>Draft Local Plan policy:</b></p> <p>Policy 1 (Policy CS5): Providing for an adequate supply of aggregates</p>
<p><b>Identifying Northamptonshire's waste management needs</b></p> <p>In order to plan effectively for our future we will seek to provide waste management capacity of at least the equivalent amount of waste produced within the county, i.e. net self sufficiency.</p> <p>The options identified included:</p> <ul style="list-style-type: none"> <li>Identifying our future waste management needs</li> </ul>	<p>Total Comments: 15</p> <p>5 Yes, 0 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>Sensible approach as it is difficult to estimate the arisings of CD&amp;E.</li> <li>Should take opportunity to change the emphasis in</li> </ul>	<p><b>Preferred approach:</b></p> <p>The strategic approach is to continue to provide waste capacity of at least the equivalent amount of waste produced in the county. There is still a shortfall in the provision of advanced treatment facilities and to a lesser extent for inert recycling. Recent surveys have provided a more up to date picture of waste arisings allowing the council to have a clearer picture of the anticipated waste arising, thus making it easier to</p>

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<p>based on: for MSW using the JMWMS model; for C&amp;I waste using the ADAS model and applying management rates based on maximising recovery; for CD&amp;E waste taking a conservative approach; and for hazardous linking arisings to C&amp;I sector output (as per the ADAS model).</p> <ul style="list-style-type: none"> <li>As there are limited options available we also considered a business as usual approach (i.e. use of the exiting model but simply extrapolating this to fit the extended plan period).</li> </ul>	<p>the approach to waste management to one of resource management.</p> <ul style="list-style-type: none"> <li>Partial review is premature should wait for new national waste management plan.</li> </ul> <p>Environment Groups</p> <ul style="list-style-type: none"> <li>Opportunities should be taken to encourage and adopt innovative methods.</li> </ul> <p>Other Councils</p> <ul style="list-style-type: none"> <li>Concerns over the terminology used, as not fully explained.</li> <li>Self sufficiency approach is supported.</li> <li>Kings Cliffe is a national facility, in the absence of additional hazardous landfills in the East of England, the council is supportive of continued operations at Kings Cliffe.</li> </ul>	<p>plan for self sufficiency.</p> <p>The aim of net self sufficiency means the council is moving towards a sustainable waste management network, as set out in the NPPF.</p> <p>Further information on waste assessments can be found in the Local assessment of waste management needs.</p> <p>Definitions for terminology used is set out in the Glossary of the Draft Plan.</p> <p><b>Draft Local Plan policy:</b>  Policy 11 (Policy CS1): Northamptonshire's waste management capacity  Policy 18 (Policy CS3): Strategy for waste disposal</p>

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<p><b>Addressing low level radioactive waste (LLW)</b>  Given that Northamptonshire does not produce LLW or VLLW from the nuclear industry and our estimated production from the non-nuclear industry is extremely low (34 m<sup>3</sup> per annum) there does not appear to be a requirement for such a facility within the county. The use of highly engineered sites, such as hazardous waste landfills, for the disposal of LLW and VLLW may not constitute the best use of such sites and could displace the facilities existing role. In addition the continued disposal of LLW and VLLW within Northamptonshire could be seen as going against sustainable transport movements; as such waste could be disposed of at existing non-inert landfills closer to its source.  The options identified included:</p> <ul style="list-style-type: none"> <li>• Making the best use of our existing facilities and encouraging sustainable transport movements through disposal of LLW and VLLW (where possible) at existing non-inert landfills closer to its source rather than being imported to Northamptonshire - a county that does not produce LLW or VLLW at a significant rate.</li> <li>• As there are limited options available we also considered a business as usual approach (i.e. not including a specific policy – this would mean that the plan would remain silent on the issue and there would be a there would be a presumption in favour of development).</li> </ul>	<p>Total Comments: 15  5 Yes, 0 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>• Should make provision for own arisings of LLW even if they are small.</li> <li>• The ENRMF is a national facility and should be seen in this context.</li> <li>• The importation of LLW will not displace hazardous waste provision due to low volumes of LLW.</li> <li>• LLW or VLLW is a national issue. Northants benefit from electricity and therefore have some responsibility for waste.</li> </ul> <p>Environmental Groups.</p> <ul style="list-style-type: none"> <li>• Radioactive waste should be dealt with as close too source as possible.</li> </ul> <p>Other Councils</p> <ul style="list-style-type: none"> <li>• Linking provision to C &amp; I waste is inappropriate.</li> <li>• The application for an extension to the ENRMF is not referred to.</li> <li>• Correct approach to encourage LLW and VLLW to be disposed of at existing landfills closer to it source.</li> <li>• Any landfills being used for LLW would need an environmental permit. Currently only four sites can take LLW and this situation is unlikely to change in the future.</li> </ul>	<p><b>Preferred approach:</b>  As the county already has a site taking LLW, the plan cannot seek to rule out LLW disposal in the County.</p> <p>LLW comes from distant nuclear facilities, it is felt by the council that this is not appropriate and facilities should be provided nearer to where waste is generated.</p> <p>Policies in the plan in relation to waste management will be extended to include LLW, highlighting that sustainability is important in LLW applications.</p> <p>This would mean that the county is moving towards a sustainable waste management network as set out in the NPPF.</p> <p><b>Draft Local Plan policy:</b>  Policy 21: Development criteria for radioactive waste disposal</p>
<p><b>Existing spatial strategy, site allocations and specific development policies</b>  We are not proposing to change the spatial strategy, site allocations or specific development criteria in the adopted MWDF as part of the Partial Review.  This issue was raised to test whether the industry or community felt there was an over-riding need to change these key elements of the plan. As this was not indicated through the consultation responses this issue</p>	<p>Total Comments: 15  8 Yes, 1 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>• Support existing spatial strategy.</li> <li>• Agree that it is inappropriate to include site allocations.</li> </ul>	<p><b>Preferred approach:</b>  The Council has decided not to amend either of the spatial strategies. These were only recently adopted, so the areas that are being focussed on are those that have changed due to implementation of the NPPF.</p> <p>There have been no local significant changes that require the spatial</p>

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<p>will not be taken forward and so will not be subject to further SA as these elements were assessed through the MWDF plan-making process.</p>	<ul style="list-style-type: none"> <li>• The review should be in line with the new MSA guidance issued by BGS.</li> <li>• Policies should all have a local perspective. Environment Groups</li> <li>• Agree but if other techniques are identified may need amendment. Government Organisations</li> <li>• Should take this as an opportunity to review the effectiveness of the policy relating to catchment areas.</li> <li>• The partial review must satisfy requirements for HRA. Other Councils</li> <li>• NPPF has not created a need to revise the Spatial Strategy.</li> </ul>	<p>strategies to be amended at this time.</p> <p><b>Draft Local Plan policy:</b></p> <p>Policy 2 (Policy CS4): Spatial strategy for mineral extraction</p> <p>Policy 12 (Policy CS2): Spatial strategy for waste management</p>

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<p><b>Addressing climate change</b>  The revised policy could plan for minerals and waste development which takes place in locations and in ways that reduce greenhouse gas emissions.  The options identified included:</p> <ul style="list-style-type: none"> <li>• Increase the policy coverage of climate change through the plan, such as supporting energy efficiency improvements to existing developments and making sure that schemes are in-line with the Government's zero carbon buildings policy and other national standards. There is also opportunity for this policy to take full account of flood risk and water supply.</li> <li>• As there are limited options available we also considered a business as usual approach (i.e. not including a specific policy / increased detail on climate change).</li> </ul>	<p>Total Comments: 14</p> <p>6 Yes, 1 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>• The spirit of seeking to reduce CO2 emissions is understood but rather than set out generalities on design and the approach to the use of resources better outputs could be achieved by ensuring local constructions markets have a local mineral source.</li> <li>• Much of CS7 is already covered in the NPPF.</li> <li>• Needs to be less general and more specific.</li> <li>• Industry is already working to reduce its carbon footprint in relation to transport.</li> </ul> <p>Other Councils</p> <ul style="list-style-type: none"> <li>• Climate change is an issue of increasing importance and minerals and waste have a role to play in mitigating its effects.</li> <li>• Policy maybe difficult to enforce.</li> <li>• Focus on energy efficiency improvements and flood risk is aligned with a sustainability agenda therefore is a positive action.</li> </ul> <p>Government Organisations</p> <ul style="list-style-type: none"> <li>• Support reference to making efficient use of water in relation to sustainable development.</li> <li>• Should recognise the need to protect and enhance the character of historic areas.</li> </ul>	<p><b>Preferred approach:</b>  Reference to low carbon development and increasing protection arising from climate change are now to be specifically referenced in the policy and explanatory text.  This is to support the national transition to a low carbon future and making sure that any future developments are in line with the governments Zero Carbon buildings policy.</p> <p><b>Draft Local Plan policy:</b>  Policy 30 (Policy CS7): Sustainable design and use of resources</p>

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<p><b>Development requirements for neighbourhood waste management facilities</b></p> <p>The requirements currently placed on development in relation to the provision of waste management facilities could be considered to be excessive or potentially hindering development.</p> <p>The options identified included:</p> <ul style="list-style-type: none"> <li>• Reducing the developer requirements.</li> <li>• Business as usual approach (i.e. retaining the existing policy and related developer requirements set out through the SPD).</li> </ul>	<p>Total Comments: 12</p> <p>1 Yes, 4 No</p> <p>Other Councils</p> <ul style="list-style-type: none"> <li>• Growing settlements need to have sustainable waste management facilities.</li> <li>• No need to relax the development requirements.</li> <li>• Suggest that the definition of “significant” be re-examined as could potentially hinder the development.</li> <li>• Would like the plan to establish if the ENRMF will be available throughout the plan period.</li> </ul> <p>Government Organisations</p> <ul style="list-style-type: none"> <li>• Should pay due regard to the need to conserve and enhance the historic environment.</li> </ul>	<p><b>Preferred approach:</b></p> <p>The council have decided to amend the wording to make the policy more flexible and the explanatory text will be updated to remove the specific thresholds of the “significant development”. This is because the thresholds in some cases were too low, and the council does not want to put barriers in the way of developments coming forward, as outlined in the NPPF.</p> <p><b>Draft Local Plan policy:</b></p> <p>Policy 31 (Policy CS8): Co-location of waste management facilities with new development</p>
<p><b>Encouraging sustainable transport movements</b></p> <p>The Partial Review creates the opportunity to strengthen policy relating to sustainable transport and link this to other related areas of the Plan, such as the use of catchment areas for waste-related development.</p> <p>The options identified included:</p> <ul style="list-style-type: none"> <li>• Strengthen policy relating to sustainable transport and link this to other related areas of the Plan, such as the use of catchment areas for waste-related development.</li> <li>• Business as usual approach (i.e. retaining the existing policy).</li> </ul>	<p>Total Comments: 13</p> <p>6 Yes, 1 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>• It is inevitable that aggregates will be transported by road to markets.</li> <li>• Ensure sufficient supplies of aggregates in the county so that construction sites have easy access to aggregates.</li> </ul> <p>Environment Groups</p> <ul style="list-style-type: none"> <li>• This policy should be incorporated into Local Plans to ensure it is across all planning authorities. Will have limited impact as part of the Minerals Plan in isolation.</li> </ul> <p>Other Councils</p> <ul style="list-style-type: none"> <li>• Further development of this approach in relation to sustainable transport would need to be carefully derived and justified by evidence.</li> <li>• Deal with waste closer to source to encourage</li> </ul>	<p><b>Preferred approach:</b></p> <p>The policy and explanatory text in relation to the sustainable transport policy will be amended to include minimising distances that waste has to travel in line with the councils approach to having catchment areas for waste facilities.</p> <p>The reduction in distances travelled will go alongside the national transition to a low carbon future as the movements all generate greenhouse gases.</p> <p><b>Draft Local Plan policy:</b></p> <p>Policy 23 (Policy CS9): Encouraging sustainable transport</p>

Strategic issue and identified options	Summary of consultation responses	Preferred approach and Draft Plan policy
	sustainable transport movements.	

Strategic issue and identified options	Summary of consultation responses	Preferred approach and Draft Plan policy
<p><b>Ensuring high standards for restoration and after-use</b></p> <p>As the Partial Review will roll the existing DPDs into one document it may be better to combine existing Policies CS13 and CMD13. In addition the policy could be strengthened to ensure that local policy thoroughly covers the restoration requirements and clearly set out what is to be covered in the restoration plan.</p> <p>The options identified included:</p> <ul style="list-style-type: none"> <li>Strengthen the policies to ensure that local policy thoroughly covers the restoration requirements and clearly set out what is to be covered in the restoration plan. This is particularly important due to the reduced detail contained within the NPPF.</li> <li>Business as usual approach (i.e. retaining the existing policy).</li> </ul>	<p>Total Comments: 14</p> <p>8 Yes, 1 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>CS13 and CMD13 are broadly similar and should be combined in one policy.</li> <li>CMD13 appears to be thorough. There maybe some scope for limited adjustment having regard to para 143 of the NPPF.</li> <li>Concerns that insistence on fill for restoration is indirectly preventing minerals workings. Need to prioritise non –recyclable inert wastes to restoration.</li> </ul> <p>Environmental Groups</p> <ul style="list-style-type: none"> <li>Need strict planning conditions that are enforced.</li> </ul> <p>Other Councils</p> <ul style="list-style-type: none"> <li>Merge policies into a single policy.</li> <li>Support opportunity to strengthen policy, particularly given the reduced level of detail in NPPF.</li> </ul> <p>Government Organisations</p> <ul style="list-style-type: none"> <li>Should include reference to historic assets as currently included in Policy CMD3.</li> <li>Concerns that the policy as it stands might have impacts on the SPA.</li> </ul>	<p><b>Preferred approach:</b></p> <p>Policy CS13 and CMD13 are to be merged into one combined policy with additional details provided setting out local requirements where appropriate. This will reduce unnecessary duplication. It is considered that the existing policy, guidance set out through the SPD and requirements of the NPPF provide sufficient coverage of restoration requirements.</p> <p><b>Draft Local Plan policy:</b></p> <p>Policy 28 (Policy CS13 and CMD13): Restoration and after-use</p>
<p><b>Minimising impacts of minerals and waste development</b></p> <p>Policy CS14 is a useful general policy on which to assess development proposals because of its wide general scope. The Partial Review presents the potential to extend this policy's scope to pick up on any key elements of previous national guidance on minerals and waste that are no longer specifically covered in the NPPF.</p> <p>The options identified included:</p> <ul style="list-style-type: none"> <li>Strengthen the plans coverage of these matters by expanding the policy scope to pick up on any key</li> </ul>	<p>Total Comments: 14</p> <p>6 Yes, 2 No</p> <p>Industry</p> <ul style="list-style-type: none"> <li>General policies are of no value. Would need to see re-worded policy.</li> <li>No benefit to be gained from revising policy CS14.</li> <li>CS14 is largely covered by national policy.</li> </ul>	<p><b>Preferred approach:</b></p> <p>This policy is being extended to also include: emissions, flood risk, odour, bioaersols, noise and vibration, slope stability, vermin and pests, bird strike, litter, land use conflict and cumulative impact. This is due to the reduction in detail contained in the NPPF.</p> <p><b>Draft Local Plan policy:</b></p> <p>Policy 22 (Policy CS14): Addressing the impact of proposed minerals and waste development</p>

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<p>elements of previous national guidance on minerals and waste that are no longer specifically covered in the NPPF</p> <ul style="list-style-type: none"> <li>• Business as usual approach (i.e. retaining the existing policy).</li> </ul>	<p>Environmental Groups</p> <ul style="list-style-type: none"> <li>• Environment should be protected at stages of construction, operation and restoration.</li> </ul> <p>Other Councils</p> <ul style="list-style-type: none"> <li>• There are developing issues such as bird strike and slope stability. It would be appropriate for the partial review to consider these issues.</li> <li>• Support a local policy in order to reduce reliance on less detailed national policy.</li> </ul> <p>Government Organisations</p> <ul style="list-style-type: none"> <li>• Make it clear environmental designations include heritage assets.</li> </ul>	