Role of the Statement of Consultation and Engagement

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

The purpose of the Statement of Consultation and Engagement is to set out:
- Who was invited to be involved in plan preparation,
- How they were invited to be involved in the plan preparation, an
- A summary of the main issues raised and how they have been addressed.

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

Background to the Minerals and Waste Local Plan

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. This is a plan that sets out strategy, provision, policies and sites for minerals and waste development.

Government guidance says that planning authorities should have and maintain an up-to-date plan. Although the Minerals and Waste Local Plan is currently up-to-date and fully compliant with the National Planning Policy Framework (NPPF), it needs to remain so. Bearing in mind revision normally take around two to three years depending on complexity, the gap between revisions should be relatively short.

The update concentrates on: the minerals and waste allocations and designations and the approach taken to these, particularly regarding waste sites; and the plans coverage of fire safety for waste development. It is not proposed to review any other components of the adopted MWLP. The update does not change the status of the adopted MWLP as the statutory development plan for Northamptonshire.

Consultation on the Issues and Options

The Issues and Options consultation was the first formal stage in the Update process. The purpose of the document was to encourage discussion on how it was best for Northamptonshire to precede with the Update. The document identified seven key issues for discussion.

- Issue 1: Planning for landbanks
- Issue 2 : Progress on the adopted allocations
- Issue 3: Potential allocations for the Local Plan Update
- Issue 4: Approach to be taken to allocation of waste sites/locations
- Issue 5: The distribution of waste management facilities in the Central Spine
- Issue 6: Managing the risk of fires on waste sites
- Issue 7: Other matters for consideration

The consultation period for this document ran from 14 May to 9 July 2015. Documents also published alongside the Issues and Options document for consultation included the Local
Notifications at the start of the consultation were sent to approximately 1,000 contacts on our mailing list. The list below shows the types of bodies on our mailing list.

- Adjoining Authorities
- Adjoining Parishes
- Agents
- Business Groups
- Community Residents Groups
- County Bodies
- Developers
- Duty to Co-operate Authorities*
- Education
- Environmental Groups
- Faith, Race, Gender and Disability Groups
- Government
- Government Bodies
- Health
- Industry – Waste
- Industry - General
- Industry - Minerals
- Infrastructure/ Utilities
- Joint Waste Strategy
- Landowners
- Members of Parliament / Members of European Parliament
- Minerals and Waste Organisations
- Northamptonshire County Councillors
- Northants Districts and Boroughs
- Parish Councils
- Private Individuals
- SEA Consultation Bodies
- *Duty to Co-operate Authorities are all the other minerals and waste authorities in England and Wales.

The notification letters and emails 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 documents were also placed on the County Council websites and County Councils online consultation system.

The consultation was 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 consultation, it also triggered a tweet to be published on the County Council twitter account.

In total 46 respondents made representations with a further 5 specifically making no comment. A summary of the strategic issues and options identified in the consultation paper, responses received and preferred approach is outlined below.

**Minerals**

- Respondents generally supported the maintenance of landbanks for sand and gravel after the end date of the period by identifying surplus or reserve sites.
There was support for removing sites from the plan that had already been permitted or had not been supported during the recent call for sites consultation.

Rather than having reserve sites, it was suggested by the industry that areas of search might be more suitable, focusing on growth areas.

There was general support for having allocations for extraction of building and roofing stone.

**Waste**

Responses as to whether sites for inert recycling and advanced treatment should be allocated was divided. Some respondents considered that it ensured clear guidance on the spatial strategy for developers and the local communities, whilst others felt that due to the small capacity gaps they could be achieved using the development criteria.

Most respondents were happy with the number and boundaries of the industrial area designations.

Most respondents agreed there was no need to allocate sites for inert recovery/landfill and that capacity could be meet through mineral extraction.

Responses in relation to the distribution of waste facilities was divided with many respondents recommending an even balance of waste development across the county, whereas other respondents felt that waste facilities should be located close to areas of higher waste arisings.

**Minerals and waste allocations suggested**

A potential new inert landfill location west of Irchester and mineral extraction north-west of Welford and north-east of Oundle were suggested by landowners.

**Managing Fire Risk**

In relation managing fire risk a number of respondents felt that is should be left to the Environment Agency as part of the permitting system, others felt that the plan should direct applicants to the Environment Agency guidance, although a large number of respondents supported adding criterion to policy to address the matter of fire risk.

**Other Comments**

Thames Water requested a policy be added to allow the development or expansion of waste water facilities.

The update should review the catchment area policy.

Most of the other representations tended to either fully or generally support the proposed approaches suggested in the consultation document. A schedule of responses made, along with comments by the planning authority, is available on the Councils website. Some responses suggested wording and amendments and points of clarification and these suggestions have been included in the document in a number of cases.

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

**Minerals and Waste Local Plan Update – Draft Plan for Consultation**

The Minerals and Waste Local Plan Update – Draft Plan for Consultation (the equivalent of a preferred options stage) was published 3 December 2015 and consultation ran for a period of ten weeks until 11 February 2016. To highlight the changes made from the adopted document, any proposed new or changed parts were underlined or crossed out.

As with the Issues and Options Consultation, all documents were published on the County Council website and the Council’s online consultation system. The consultation was listed on the County Council’s 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 Issues and Options consultation were notified again. Most consultees were notified via email and this email provided a direct link for stakeholders 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 Minerals and Waste Local Plan Update – Draft Plan for Consultation included a Sustainability Appraisal Environmental Report, Sustainability Appraisal Scoping Report, Habitats Regulations Assessment Screening Update, Habitats Regulations Assessment Final, Site Assessment Methodology, Technical Appendix, MWLP Flood Risk Sequential Test, SFRA Update and Local Aggregates Assessments for 2014 and 2015.

In total 40 responses were received, providing a total of 193 separate comments (a further three organisations provided a response of no comment). Responses received came from Highways England, Natural England, District and Borough Councils, Parishes, Residents, Agents, Historic England, Environment Agency, County Council and Industry. The largest proportion of both respondents and of individual representations related to the proposed new allocation at Passenham Extension East. This is an extension to an existing operational quarry into an area with the local name of Ham Meadow. Respondents, who were mainly local residents, raised issues around protecting general/residential amenity, visual intrusion, historic environment (assets and their setting), transport and access, environmental value/features and flood risk. However, none of the issues raised were not previously known and it is considered based on the assessments carried out, that this site is still appropriate to take forward as an allocation. Matters of detail would still be required to be carried out at the planning application stage and no planning permission would be granted if significant matters are not able to be satisfactorily addressed.

The representations can be viewed online at:  

**Minerals and Waste Local Plan Update – Final Draft Plan**

The Minerals and Waste Local Plan Update – Final Draft Plan was published for consultation on 26 May 2016 and consultation ran for a period of eight weeks and finished on 21 July 2016. 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 MWLP documents were highlighted.

The Final Draft consultation was carried out in the same way as the Draft Plan consultation, with stakeholders being notified by emails and copies of the documents placed online and at libraries and receptions. All supporting documents (updated and amended as appropriate) were published alongside the Final Draft Plan, a guidance note for respondents.

In total 16 responses were received, providing a total of 39 separate comments (a further 7 organisations provided a response of no comment). Responses came from Highways England, Natural England, District and Borough Councils, Agents, Historic England, County Council and Industry.

Sections of the plan that received representations included sections on radioactive waste, new guidance has been published and so amendments to the Plan are required to bring it into line. Concerns were raised in relation to the distribution of waste development in the County and linking this to actual arisings and waste generation forecasts. There was an
objection to an omission of a site and also suggestions that buffer zones should be placed around waste facilities. In terms of minerals it was the sites that generated most interest with site M6 Passenham East Extension raising the most concern. Comments also included support for a number of sites and also the inclusion of a fire risk policy.

The representations can be viewed online at: https://consult.northamptonshire.gov.uk/consult.ti/final_draft_plan/consultationHome

**Conclusion**

In moving towards the submission of the Minerals and Waste Local Plan Update, 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

The preferred approach for the issues previously identified

#### Strategic issue and identified options

**Issue 1: Planning for landbanks**

Should the Council seek to encourage the maintenance of a landbank for sand and gravel (seven years) and limestone (ten years) after the end date of the plan by identifying surplus or reserve sites? Yes / No.

#### Summary of consultation responses

Total Comments: 21 (Yes – 10, No – 1)

**Industry**

- Provision of a landbank (viewed as minimums) at the end of the plan period would provide greater flexibility, ability to respond to market drivers and assist in maintaining adequate supply during transitional periods (e.g. review/replacement of plans).
- Identification of landbanks and reserve sites may give industry long term certainty.
- Review mechanisms should be sufficient to maintain the landbank.
- Reference to allocated sites as ‘reserves sites’ may introduce policy constraints - preventing applications coming forward in the earlier stages of the plan.

**Environmental groups**

- Commitments not implemented / allocations should be reviewed regularly to prevent outdated conditions and obligations that are not fit for purpose.
- Maintenance of landbanks with surplus or reserve sites is good practice to deter speculative planning applications.
- Only sites that are appropriate for extraction, on balance with environmental and social impacts, should be considered as allocation of less suitable sites may discourage better sites from coming forward if it appears demand has been met.

**Other Authorities**

- Monitoring mechanisms should be sufficient to maintain the landbank without identification of surplus or reserve sites.
- Provision of a landbank (viewed as minimums) at the end of the plan period would provide an additional certainty and flexibility over plan period.

#### Preferred approach and Draft Plan Policy / reference

**Preferred approach**

The Draft Plan is proposing that allocations should provide for the full requirement of minerals provision for the whole of the plan period from the start of the current plan period in 2011 to 2031, along with a further period to ensure there is a landbank beyond this period (i.e. a further 7 years for sand and gravel sites and a further 10 years for crushed rock), both in line with national policy and Policy 1 of the adopted MWLP.

**Draft Local Plan reference**

Policy 1: Providing for an adequate supply of aggregates

Paragraph 4.11

#### Strategic issue and identified options

**Issue 2: Progress on the adopted allocations**

2A) The above summary of the adopted allocations has identified a number of sites that are still considered to be good sites to remain as allocations (refer Table 2). Do you agree with these findings? Yes / No.

2B) The above summary of the adopted allocations has identified several sites that are not considered to be good sites to remain as allocations (refer Table 2). Do you agree with these findings? Yes / No.

#### Summary of consultation responses

2A) Total Comments: 21 (Yes – 14, No – 2)

**Industry**
• Summary of existing allocations indicating those to remain and those to be removed is a reasonable appraisal.

Environmental groups
• Collyweston slate, Weldon Limestone and building quality ironstone are subject to market forces and to fashions.
• Concerns regarding the Heyford site and impacts on traffic, residents and ecology.
• Support the removal of Bozeat, concerns that the site assessments do not consider nearby housing.

Other Authorities
• Sites not supported at the recent call for sites should be removed from the allocations.

2B) Total General Comments: 9 (Yes – 7, No – 1)

Site Specific Comments
Passenham South = 1 comment
• The site plan is now incorrect and needs to be amended.

Bozeat Extension = 1 comment
• Site should remain in the plan as has landowner support and also has industry interest.

Wakerley = 1 comment
• Site should be operational within the plan period and should be retained for the time being.

Collyweston = 2 comments
• Site is still a potential development opportunity so should be retained.
• Assessment should be updated as a local mine has received permission to re-open.

Dodford = 1 comment
• The lack of landowner and industry support brings into question the viability of the site and removal is supported.

Earls Barton West = 1 comment
• Site supported by landowner

Industry
• Agree that sites with no real support especially operator support should no longer be carried forward.

Other Authorities
Sites not considered to be good sites should not remain as allocations. This would hinder the opportunity for other, better sites which may come forward in the future.

Preferred approach and Draft Plan Policy / reference
Preferred approach
The following current local plan allocations are to be retained due to evidence supporting deliverability and assessment of site characteristics/potential impacts:
- sand and gravel - Milton Malsor, Bozeat, Heyford and Earls Barton West Extension;
- crushed rock - Wakerley; and building and roofing stone - Collyweston Village.

It is accepted that both Milton Malsor and Heyford allocations have been in adopted plans for a considerable number of years but it is considered that the circumstances are such that these would be implemented during the plan period. Work by the agent at Milton Malsor to address access difficulties (involving negotiations with Network Rail) is progressing. Whilst the access difficulties at Heyford which were expensive to address will be resolved by the construction of the A45 Daventry Development Link.

The current allocation at Passenham South is to be amended to delete that part already permitted and the area to the south west, where the prospective operator considers the resources are not viable.

It is proposed to remove the following existing allocations from the Updated Plan due to reduced deliverability:
- sand and gravel - Dodford and Wollaston West;
- crushed rock and building stone - Pury End (South).

Draft Local Plan reference
Policy 4: Sites for the provision of sand and gravel
Policy 5: Sites for the provision of crushed rock
Policy 7: Sites for the provision of building and roofing stone

Strategic issue and identified options

Issue 3: Potential allocations for the Local Plan Update
The Call for Sites process identified nine sites for sand and gravel, four for limestone (crushed rock) of which three also support production of building and roofing stone. All of these sites, plus the adopted allocations, have been subject to an initial screening assessment (refer Table 3).

3A) Do you agree with the brief summaries above, but in particular the findings of the assessments? Yes / No. If no, please provide details on why not.
3B) Are there any particular sites that you consider to be more/less suitable than others? Please provide your reasoning.
3C) If reserve sites were to be included in the Draft Plan do you consider any of the potential allocations more appropriate? Please provide your reasoning.
3D) As there is no specific provision to be met for building or roofing stone compared to sand and gravel and crushed rock is there any need to identify specific allocations for such extraction? Yes / No.
3E) Are there any other matters that you wish to raise about the approach to allocating mineral sites and to the potential allocations put forward for consideration?

Summary of consultation responses
3A) Total General Comments: 11 (Yes – 5, No – 0)
Government organisations
- There are multiple sites in close proximity to the SRN, will require assessments to be carried out on the potential impacts.
- Need to seek the advice of the Historic Environment Record on undesignated sites.
Site specific comments
Denford = 4 comments
- The A14 could be a key route so a transport assessment would be required.
- The Nene Valley is known to have a long history of human activity and settlement. There are scheduled monuments to the north and west of the site.
- Adjacent to the River Nene so presents environmental risks, that need to be assessed.
- Site should not be included as there is no clear evidence of quality or yield.
Elton = 4 comments
• Several listed buildings and scheduled monuments are identified on the screening.
• Adjacent to the River Nene so presents environmental risks, that need to be assessed.
• Allocation is unsound as insufficient details regarding access have been provided.
• Access is not ideal and the site is not strategically located to serve markets.

Parsennham = 9 comments

• Site is to near the villages and includes a burial mound listed in NCC sites and monuments records.
• Site is relatively close to the A5 junction and therefore potential traffic impacts will need to be considered.
• Grade I listed church lies to the east of the site, need to consider impact on heritage assets.
• Adjacent to the River Ouse presents environmental risks that will need assessment.
• A protected species survey has been undertaken on site.
• Concerns over flood risk for this site, as site is on an island between 2 branches of the ouse and within the functional floodplain.

Ryehill = 4 comments

• Site lies directly between A5 and M1 and in close proximity to the canal system.
• Grade II buildings to the south of the site, further assessment would be required.
• Part of site is a potential wildlife site.

Earls Barton = 3 comments

• Site is adjacent to the A45, and in close proximity to the River Nene. Assessments on drainage/flooding on the road will need to be completed. Traffic impact survey of A45 required.
• Site may impact on the setting of the Listed Buildings to the south of Earls Barton.
• Landowner supports the inclusion of the site which fits the overall spatial strategy.

Heyford = 2 comments

• Site is adjacent to the M1 junction and the A45. Assessments on drainage/flooding on the road will need to be completed.
• Significant non-designated archaeological remains to the south of the site.

Milton Malsor = 4 comments

• Site lies between the M1 and A43. Assessments will be required to assess the potential issues of draining/flooding on the road network. Traffic impact surveys will be required.
• Several listed buildings are located to the west of the proposed site. Further assessment on the potential impact on heritage assets will be required.
• Development requirements should highlight no access via the village centres.

Easton Lodge = 2 comments

• Close to Collyweston Great Wood and Easton Hornstocks SSSI, may require further assessment.
• Site will bring additional security as it contains sufficient reserves to meet the apportionment figure later and beyond the plan period.

Harlestone = 3 comments

• Further assessment required to determine potential impact on heritage assets and setting of the Listed Buildings to the north.
• Opportunity for habitat creation through restoration.
• Further information should be supplied in relation to phasing of the site.

Pury End = 3 comments

• Site lies between A43 and A5, assessments required of potential geological and drainage/flooding issues on the road. Traffic impact surveys would need to be
undertaken.
• Further assessment required on the potential impact on the heritage assets.
• Potential for limestone grassland creation through site restoration.
Bozeat 1 = comment
• Site continues to have landowner support and discussions are ongoing with a potential operator.
3B) Total Comments: 13
Passenham East = 4 comments
• Site is too near to the village and includes a burial mound listed in the site and monuments register.
• Passenham conservation area is possibly going to be extended and the site would now lie within the conservation area.
• Proposals for Calverton across the border should be included in the NCC Plan.
Milton Malsor = 1 comment
• As the only soft sand site in the plan it must remain an allocation.
General comment = 8 comments
• Sites contained in the current MLP have been subject to a greater degree of scrutiny and assessment and would seem to be more suitable.
• Certain sites should be moved on to a reserve site list.
3C) Total Comments: 6
Industry
• MA6 Wollaston West would be an appropriate reserve site, as it is suitable as a standalone site.
• Easton Lodge is relatively remote from residences and has a proven resource.
• Extensions should be encouraged to come forward early in the plan process.
• Proposed retained sites from the adopted MLP should form the core site allocations as these have support and have been subject to an EiP and shown to be suitable.
• Sites considered suitable from the call for sites have not been subject to the same examination.
• Areas of search are recognised by NPPF (unlike reserve sites) and may be an alternative.
3D) Total Comments: 9 (Yes – 6, No – 2)
Industry
• Facilitating policy has worked well in the past and should be retained as a mean of promoting conservation stone reserves.
Environmental groups
• Roofing and building stone are needed and should be allocated in the plan.
Other Authorities
• NPPF required LPA’s to consider how to meet demand for small scale extraction of building stone, so if a suitable site has come forward it may be appropriate to include it.
3E) Total comments: 13
Industry
• Site put forward for consideration at Welford.
• Would endorse the ability for future sand and gravel extraction areas to be identified to guide additional sites that may come through the later stages of the plan period.
Environmental groups
• Little consideration is given to residents.
Government organisations
• Sites that provide Collyweston Slate should be included as there is a strong need for this material.
• HS2 safeguarding direction should be shown on the policies map.
**Preferred approach and Draft Plan Policy / reference**

**Preferred approach**

New (proposed) allocations identified through the Draft Plan include: sand and gravel – Passenham South Extension, Passenham East Extension and Elton Extension; crushed rock and building stone – Pury End Quarry Extension and Harlestone Quarry Extension.

Other new sites put forward at the call for sites stage and consulted on at the issues and options stage will not be taken forward as allocations as these sites, on balance with other sites and consideration of potential impacts, are not as appropriate for inclusion as the sites already allocated or those proposed through the Draft Plan; this includes Denford Meadows (south of Thrapston) and Ryehill Farm (Buckby Wharf).

This also applies to proposals at Welford and north of Oundle put forward at the issues and options consultation stage.

A site at Easton Lodge (east of Duddington) is not to be taken forward. This is an appropriate site to allocate however there is no requirement for another site if the Wakerley site is to come forward (it is assumed by the planning authority that it will).

**Draft Local Plan reference**

Policy 4: Sites for the provision of sand and gravel
Policy 5: Sites for the provision of crushed rock
Policy 7: Sites for the provision of building and roofing stone

**Strategic issue and identified options**

**Issue 4: Approach to be taken to allocation of waste sites / locations**

4A) Given the permitted capacity and remaining capacity gaps is there a need to identify site-specific allocations to facilitate delivery of the remaining capacity requirement for inert recycling and advanced treatment or can the need for these be taken up through industrial area designations, development criteria and other relevant policies? Yes – There is still a need for site-specific allocations for inert recycling and advanced treatment (please provide justification). No - industrial area designations, development criteria and other relevant policies will be able to provide adequate opportunities for development of inert recycling and advanced treatment facilities.

4B) Is there a need to identify more industrial location designations, add new ones or adjust the boundaries of the existing ones? Yes / No. Are there any in particular that should be included or excluded from the plan or require an amendment to their boundaries? If so, please provide details.

4C) If the Plan is still to identify site-specific allocations would you agree that there is no need to allocate sites for inert recovery / landfill as the required capacity can be met through committed sites and future mineral extraction (allocated sites)? Yes / No.

4D) If the Plan is still to identify site-specific allocations would you agree with the approach outlined for hazardous disposal, i.e. not allocating specific sites and fully relying on local development criteria? Yes / No.

4E) If the Plan is still to identify site-specific allocations would you agree with the approach outlined for non-inert disposal, i.e. maintaining a watching brief and closely monitoring the situation to determine if, and when, additional capacity may be required? Yes / No.

**Summary of consultation responses**

4A) Total Comments: 22 (Yes – 5, No – 5)

**Industry**

- Sites must be identified which comply with NPPW S4.
- Industry needs non-mineral restoration sites for the disposal of inert waste.
- Ensure clear guidance in particular on spatial strategy for developers and local communities alike.
- Given the difficulties in obtaining planning permission for waste management facilities it is our view that specific sites should continue to be allocated.
Inert recycling and advanced treatment capacities should be able to be allocated through industrial area designations and development criteria.

**Environmental groups**
- All extraction must be responsible for its own site recycling and the area needed for this must be in allocated acreage of site, and the cost of recycling born by the minerals company.

**Government organisations**
- Location of waste facilities close to industrial areas is welcomed by Highways England to ensure that waste is managed as close to the source as possible in order to reduce the distance untreated waste has to travel.
- Would be useful to consider the implication of London exports, given the large quantities of inert waste being managed by neighbouring authorities.

**Other Authorities**
- Requirement for inert fill may partly be met by void space at existing quarries in neighbouring authorities.
- Still a need for site-specific allocations for inert recycling and advanced treatment.
- Carefully identified land allocations are seen as the best way to deliver sustainable waste management in the county and provide clarity and certainty to both the industry and the community.

4B) Total Comment: 7 (Yes – 2, No – 4)

4C) Total Comment: 12 (Yes – 7, No – 2)
- It would be helpful to have a facilitating policy for inert waste landfill sites in the same way that there is for conservation stone quarries.
- No need to indentify sites for inert recovery/landfill as the capacity can be met through future allocated mineral sites.

4D) Total Comment: 8 (Yes – 4, No – 2)
- May not be appropriate to allocate specific sites to treat hazardous waste, however it is important that a suitable policy is included in the plan.
- Hazardous waste needs special attention rather than leaving it to the free market.

4E) Total Comment: 10 (Yes – 4, No – 2)
- Co-operation required with Local Authority on optimum county CHP scheme.
- A targeted approach is needed to maximise opportunities to respond to changing demands without saturating supply which may have an adverse impact on local economy, environment and communities.
- Non-inert waste needs special attention rather than leaving it to the free market.
- Extensions to existing operational sites should be preferred and encouraged.

**Preferred approach and Draft Plan Policy / reference**

**Preferred approach**
The Plan is now proposed to largely not include allocations, with only the existing allocations at Northampton East and Corby South East being carried forward. The boundaries of several industrial area designations have been adjusted as follows:
- WL16 and WL18 expanded to incorporate adjacent / related existing industrial areas;
- and WL17 reduced to exclude land off Stanion Lane that was granted planning permission for residential development.

**Draft Local Plan reference**
- Policy 13: Locations for waste management facilities
- Paragraph 5.57 and 5.60 – 5.64

**Strategic issue and identified options**
Issue 5: The distribution of waste management facilities in the Central Spine

Should the MWLP seek to manage the distribution of waste development within the county in order to reinforce communities taking more responsibility for their own waste and address perceived over-concentration of waste management facilities in certain areas?

- Yes – For all proposals for waste related development. If so what threshold or basis for apportionment should be used as the trigger for when an area is seen as having over-provided? Please provide justification.
- Yes – But only for proposals relating to those management methods where there is already sufficient capacity. If so what threshold or basis for apportionment should be used as the trigger for when an area is seen as having over-provided? Please provide justification.
- No. Please provide justification

Summary of consultation responses

Total Comments: 11 (Yes for all proposals – 3, Yes for some proposals – 0, No – 4)

Industry

- It is becoming increasingly difficult to find sites for the establishment of new waste facilities. Therefore the industry needs to be provided with a much flexibility as possible for the choice of a new site.
- Market demand, land availability and sources of waste will dictate the location of waste development. An evenly balanced waste development may not be economically or commercially viable.

Other Authorities

- Without adopting the proximity principle approach, Local Authorities are potentially burdened with higher waste processing and disposal costs. Focusing sites along the central spine maximises the benefits provided by the good transport connections.
- Waste facilities should be located in appropriate locations, ideally close to waste arisings, rather than being evenly distributed across the county.
- A specific steer is needed to manage the distribution, this will address the over reliance on general industrial development locations which inevitably means that areas with more industrial areas take a disproportionate burden.

Preferred approach and Draft Plan Policy / reference

Preferred approach

It is proposed that the following statement is added to Policy 13 (Development criteria for waste management facilities): Proposals within the central spine should also demonstrate how the development affects the overall distribution of Northamptonshire’s waste management network and that it would not result in unacceptable cumulative impacts (resulting from in-combination effects of existing and proposed development) adversely affecting the local area.

In order to balance out the removal of the majority of site-specific allocations and ensure compliance with government guidance it is proposed to retain all of the industrial area designations.

Draft Local Plan reference

Policy 11: Spatial strategy for waste management
Policy 12: Development criteria for waste management facilities (non-inert and hazardous)
Paragraph 5.51

Strategic issue and identified options
### Issue 6: Managing the risk of fires on waste sites

6A) Should Policy 27: Layout and Design Quality be amended through either an amendment to the existing criterion on building in safety and security or by including an additional criterion in order to address managing the risk of fires? **Yes / No.**

6B) Should appropriate detailed guidance also be set out in a revision to the Development and Implementation SPD? **Yes / No.**

<table>
<thead>
<tr>
<th>Summary of consultation responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>6A) Total Comments: 12 (Yes – 5, No – 3)</td>
</tr>
<tr>
<td><strong>Industry</strong></td>
</tr>
<tr>
<td>• The criterion should reference the Environment Agency guidance that is current at the time; it is not helpful to use any other guidance, as waste facilities have to comply with this in any event, so need to refer to only one set of rules.</td>
</tr>
<tr>
<td>• This is a matter for the EA and fire brigade. This is very much a permitting issue.</td>
</tr>
<tr>
<td>• Additional criterion should be applied to site operators in order to address managing the risk of fires.</td>
</tr>
<tr>
<td><strong>Government organisations</strong></td>
</tr>
<tr>
<td>• Welcomes this as a necessary addition to the Local Plan as a way of safeguarding the SRN and surrounding network from potential risk of fire.</td>
</tr>
<tr>
<td><strong>Other Authorities</strong></td>
</tr>
<tr>
<td>• Current policy is ambiguous with respect of this particular issue. Additional criterion to address this matter should be included within the policy, so that consented schemes can be appropriately controlled.</td>
</tr>
</tbody>
</table>

6B) Total Comments: 10 (Yes – 3, No – 4)

| **Industry** |
| • No necessary if EA guidance is referred to in Policy 27. |
| **Other Authorities** |
| • This will provide clear and concise design guidance which can be given weight in the decision making process. |
| • There is no reason to duplicate policy. If Policy 27 is updated, it should not be necessary to update the SPD as well. |
| • Waste sites pose a high risk of fires so opportunity to address this matter through updates to Local Plan documents is strongly supported. |

<table>
<thead>
<tr>
<th>Preferred approach and Draft Plan Policy / reference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Preferred approach</strong></td>
</tr>
<tr>
<td>It is proposed to make an amendment to Policy 23 (Layout and design quality) to include reference to managing fire risk both in the policy and explanatory text.</td>
</tr>
<tr>
<td><strong>Draft Local Plan policy reference</strong></td>
</tr>
<tr>
<td>Policy 23: Layout and design quality</td>
</tr>
<tr>
<td>Paragraph 6.36</td>
</tr>
</tbody>
</table>

### Strategic issue and identified options

#### Issue 7: Other matters for consideration

Are there any other matters that you consider the Local Plan Update should consider? **Yes / No.** If yes, please provide details.

<table>
<thead>
<tr>
<th>Summary of consultation responses</th>
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</thead>
<tbody>
<tr>
<td>Total Comments: 17, plus a further 5 comments relating to the Duty to Cooperate (DTC).</td>
</tr>
<tr>
<td>• Stop export of waste derived fuel to mainland Europe because British waste authorities appear incapable of supporting British CHP schemes.</td>
</tr>
<tr>
<td>• Potential landfill location put forward east of Irchester.</td>
</tr>
<tr>
<td>• Should use the review as an opportunity to review and update the Catchment Area policy.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Preferred approach and Draft Plan Policy / reference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>No key changes.</strong></td>
</tr>
</tbody>
</table>