

Northamptonshire Minerals and Waste Local Plan: Independent Examination, April 2014.

**Additional Statement: Matter 4 – Provision to be met for minerals and Matter 7 – Allocated Sites**

M1 – Does the Plan make provision for a steady and adequate supply of aggregates?

The Draft Local Plan acknowledges that Northamptonshire has a large amount of new development planned, and recent press reports suggest that the county is the fastest growing area in the country at the moment.

If it is agreed that the Plan should make provision for a total supply of 14.2mt sand and gravel over the period (0.71mt p.a.), as set out in GPP Representation 1, additional allocations will be required, as follows:

	NNC figures - mt	GPP figures - mt
Total tonnage required	10	14.2
Less 2 years (2011 – 2013)	1	1.42
Requirement	9	12.88
Less Commitments	5.26	5.26
Requirement	3.74	7.62

In the Adopted Locations for Minerals Development DPD (March 2011), Policy M1 identifies the allocated sites, which have been carried forward as Policy 4 in the Minerals Local Plan Final Draft.

**Pre-glacial and glacial areas**

MA1: Dodford 2.4 million tonnes (approximately)

MA2: Milton Malsor 1.2 million tonnes (approximately)

MA3: Bozeat extension 1.5 million tonnes (approximately)

**Central Nene Valley**

MA4: Heyford 1.4 million tonnes (approximately)

MA5: Earls Barton West extension 3.0 million tonnes (approximately)

MA6: Wollaston West 0.2 million tonnes (approximately)

**Great Ouse Valley**

MA7: Passenham South 1.4 million tonnes (approximately)

Of these the Earls Barton West extension – 3mt has now received planning permission and is included in the commitments. Therefore, of the 11.1mt allocated in the Adopted Plan, only 8.1mt remains. This is barely more than the 7.62mt that I calculate should be allocated.

In addition, there must be considerable doubt about the likelihood of three of the allocated sites coming forward in the plan period. These sites are MA1 – Dodford, MA2 – Milton Malsor and MA4 – Heyford. All three sites have been allocated in adopted Plans for at least 15 years and have still not come forward in the form of planning applications. All three have been constrained by access problems, the cost of overcoming them having been prohibitive. Northamptonshire County Council may have been having informal discussions with landowners/potential operators on these sites and have a better understanding of the likelihood of development. However, the current position in respect of these allocations should be set out in the new Local Plan; the limitations should be acknowledged and some additional provision should be made to provide some flexibility in the event that one or more of the

allocated sites is not brought forward. In the light of this situation, the deliverability of the Plan is in doubt and therefore does not meet the test of soundness.

Also, the Final Draft Local Plan makes no allocation for the 'at least seven years' landbank to be available at the end of the plan period (paragraph 4.11). On the basis of my calculations, this would equate to a further 10mt tonnes.

Additional sites were put forward during the consultation on the Locations for Minerals Development DPD; the review of this document in the form of rolling it into the Local Plan should be the opportunity to reconsider these sites and look at allocating some new sites, to provide flexibility during the plan period and some certainty for the 7 year period beyond 2031.

Therefore, the policy should be reworded to allow other sites to be brought forward during the plan period. This would provide the means of making the Plan meet the test of soundness.

It is acknowledged that secondary and recycled aggregates now play an important role in supplying the construction industry. However, it is more likely that these will replace the demand for the poor quality limestone (crushed rock) produced in the county. Good quality sand and gravel is required for the concreting industry, for mortar and is used for specific construction purposes such as drainage trenches, for which neither poor quality crushed rock nor recycled aggregates are appropriate.