

**Matter 3- Other General Issues**

Statement by Northamptonshire County Council

**Issue G1**

*Is the Local Plan consistent with current national legislation, policy and guidance; and is there sufficient local justification for any policies that are not consistent with national planning policy?*

- 1.1 A key purpose of the partial review was to ensure that the Council had an up to date plan that was consistent with any changed national legislation, policy and guidance. This was scoped out in the 'Way Forward' issues and options consultation with the consequent changes to the adopted MWDF in the partial review Plan considered to be in line with national planning policy in respect of minerals provision (including changed sand and gravel provision), identification of waste management/disposal capacity gap and other minor changes to policy and to text.
- 1.2 The Council considers that all of the Plan policies are consistent with national planning policy. A potential exception could be seen to be the new policy on radioactive waste disposal because this is setting a local *planning* policy where there is in effect no national *planning* policy to interpret from and cascade down from. Nevertheless the Council's view is that this policy is in line with national guidance (see Matter 6, Issue R2).

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#### **Issue G2**

*Does the Local Plan integrate effectively with plans prepared by other local planning authorities in the area (including adjoining planning authorities), and have cross-boundary issues been properly addressed?*

- 2.1 The Plan, as partially reviewed, will continue to integrate effectively with plans prepared by the local planning authorities in Northamptonshire.
- 2.2 At the time of the MWDF Core Strategy examination/adoption the position in respect of Local Development Frameworks (LDFs) in the county was that there was an adopted Joint Core Strategy for North Northamptonshire (adopted 2008) covering the four local authorities of Corby, East Northamptonshire, Kettering and Wellingborough and an emerging Joint Core Strategy for West Northamptonshire covering the three local authorities of Daventry, Northampton and South Northamptonshire. These two Joint Core Strategies together cover the whole of Northamptonshire.
- 2.3 The situation today is remarkably similar. The 2008 Joint Core Strategy for North Northamptonshire remains the adopted plan for that area and the Joint Core Strategy for West Northamptonshire has still not been adopted (the most recent public hearing sessions of its examination were held the week beginning 17 March 2014). However, site specific Development Plan Documents (DPDs) for Rural North and Thrapston areas of East Northamptonshire district and for Wellingborough district have also been adopted.
- 2.4 It should be noted that the Regional Plan for the East Midlands and the Milton Keynes and South Midlands Sub-regional Strategy were finally abolished in April 2013.
- 2.5 A replacement Core Strategy for North Northamptonshire has been progressed and was due for submission but has been delayed for well over a year due to issues around a major retail development that has been subject to a call-in inquiry. The West Northamptonshire Core Strategy has been at examination for well over a year in respect of issues over locations of sustainable urban extensions.
- 2.6 Due to the lack of changes in the development plans in the districts the impact on the partial review Plan is therefore minimal. However the waste needs assessment for the partial review has reflected the formal ending of the growth agenda in Northamptonshire through the abolition of the Regional Plan and Sub-regional Strategy and the implications on this for the Joint Core Strategies. In both halves of the county growth is still being promoted but this is now focussed on locally generated growth rather than on the very high figures, based on a national growth focus, in the old regional plans.
- 2.7 Beyond Northamptonshire, since the adoption of the MWDF Core Strategy there has been the adoption of Core Strategy/Site Specific DPDs for minerals and waste in Cambridgeshire/Peterborough (all adopted by Feb 2012) and adoption of Minerals and Waste Core Strategy in Buckinghamshire (Nov 2012) and Bedfordshire/Luton (Jan 2014) along with a Waste Core Strategy in Warwickshire (Jul 2013) and DPDs covering minerals and waste for Rutland (Oct 2010 and July 2011). These followed on from adoption prior to our MWDF Core Strategy adoption of DPDs for minerals and waste

(core strategy/DC policies/sites) for Leicestershire and Milton Keynes (waste). Local Plans have still to come forward for minerals in Buckinghamshire, Milton Keynes and Warwickshire and, following the previous plan's withdrawal, for minerals and waste in Oxfordshire.

- 2.8 In respect of these adjacent areas the Council has felt no need to make representations as plans have come forward in respect of minerals apportionments, but it has in a small number of cases made representations in respect of hazardous waste and radioactive waste where it was considered that the policy stance was too restrictive or there was no policy at all and where, subsequently, amendments were made. Adoption of these plans has not therefore had an impact on the partial review Plan
- 2.9 Cross boundary issues were identified in relation to the movement of minerals and waste. The LAA examines movements and quantifies these through use of the AMS data which shows that movements are not self-balancing with Northamptonshire being a net-importer of minerals – particularly in relation to crushed rock. The Plan seeks to address this through the allocation of sites and inclusion of development control/management policies which enable unallocated sites to come forward. The main cross-boundary issues regarding waste management and disposal identified during the plan-making process include the continued reliance of other authorities on the East Northants Resource Management Facility (ENRMF) for hazardous waste disposal and low level radioactive waste (LLW) disposal. The Plan identifies the ENRMF as having a national catchment and states that this role should be retained subject to any extant planning permission (para 5.88). In addition the Plan clarifies local requirements and preferences for the disposal of LLW through Policy 21.

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**Issue G3**

*Does the Local Plan take account of the relationship between policies in it and the requirements and infrastructure investment programmes of other agencies and service providers?*

- 3.1 The nature of minerals and waste plans, at least in this county, is such that they are not normally dependent on the requirements and infrastructure investment programmes of other agencies and service providers to be deliverable. The LAA included consideration of infrastructure programs and the future provision of minerals in Section 5.
- 3.2 The Local Waste Needs Assessment took account of the procurement process and resulting contracts for residual municipal waste as per the Joint Municipal Waste Strategy (JMWS).
- 3.3 Sewage and waste water treatment facilities are addressed through the Plan in paragraphs 5.11, 5.70-73 and 6.103.
- 3.4 Of the allocations in the adopted MWDF (which are being carried over into the Plan) only one allocation has a particular issue. This is minerals allocation MA4 at Heyford, which although it is deliverable without road infrastructure improvements being carried out as part of the A45 Flore-Weedon bypass, it is nevertheless made far more deliverable if this proceeds. This road scheme is actually progressing and a planning application for it is currently being developed for submission this summer.

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**Issue G4**

*Does the Local Plan relate to other relevant plans and strategies which influence the delivery of its proposals, including the Joint Municipal Waste Strategy?*

- 4.1 As a minerals and waste development plan the relationship between it and other plans and strategies is not as significant as that between other development plans and other plans and strategies. The delivery of, for example, allocations is not intrinsically linked to infrastructure requirements as would be the case for sustainable urban extensions. Under Issue G3 we refer to the only allocation where this could be considered an issue in the partial review Plan.
- 4.2 The most significant relationship is between the JMWS and waste capacities in our plan. The JMWS has been fully integrated into the Local Waste Needs Assessment with the JMWS forming the basis of the MSW forecasts.

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#### Issue G5

*Do the strategies and policies reflect the Vision and relevant Objectives of the Plan?*

5.1 The vision and objectives in the Plan are virtually unchanged from those in the Core Strategy and which were the vision and objectives for the remaining DPDs. Table 8 (the Monitoring Framework) shows how policies relate to the objectives.

#### *Vision*

5.2 The change to the vision from the adopted Plan is merely to move its end date forward to 2031. It is accepted that an argument could be made that moving forward the end date of when the vision will be realised implies an acceptance that the vision will not be realised by the original date given of 2026. The Council still believes it is on track to meet the vision by the original date of 2026, although clearly a further five years tied into this plan would firm up delivery of the vision. **However it is considered that it may be more appropriate for the first part of the vision to be reworded to: 'The future Northamptonshire will have seen sustained growth and development'**. This creates a vision that is not tied to plan end dates but clearly shows what the Plan aims to achieve.

#### *Objectives*

5.3 Objective 1 has been amended to delete reference to Northamptonshire being a 'key national growth area' – the reason for this being it no longer has this specific status due to the abolition of the MKSM Sub-Regional Strategy which took forward the government's focus on four growth areas as set out in the Sustainable Communities Plan.

5.4 Objective 1 has also been amended in relation to the supply of minerals to delete reference to being in line with national and regional guidance and instead referencing a steady and adequate supply. Furthermore in relation to sustainable waste management facilities the objective is now for net (i.e. county) self-sufficiency rather than regional self-sufficiency.

5.5 The changes to this objective have had no real direct influence on policies in the Plan as it is the overall changes to national and regional policy that have influenced both the objective rewording and the changes to policy. In summary the policy changes are:

- Amended waste capacity gaps in the relevant policies (Policies 11 and 18) to reflect the conclusions from the updated Local Waste Needs Assessment and which has taken account of a reduced level of growth in the county.
- The policies on sand and gravel and crushed rock provision now reflect locally provided (but guided by the new guidance in the NPPF) provision.

5.6 There has also been a minor word change in Objective 5 from waste 'treatment' to 'management', as this was considered to be a more appropriate wording. This has no implications for the policies in the Plan.

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**Issue G6**

*Do the policies provide a clear basis for making development control decisions?*

- 6.1 The existing policies are basically unchanged from the adopted policies (as demonstrated in the 'Quick reference – MWDF policies transposed across to the Local Plan' table in the 'Moving Forward' section at the start of the Draft Plan consultation document), although there is a new policy on radioactive waste disposal.
- 6.2 From the Council's perspective there have been no issues with the existing adopted policies and a number of proposals have come forward in the ensuing years for determination on both allocated and unallocated sites.
- 6.3 However, the Council did have concerns in respect of what it saw as a policy gap in relation to radioactive waste disposal because of the situation that had arisen at ENRMF since preparation commenced on the MWDF in 2006. The partial review Plan now includes a policy on radioactive waste disposal.