

PART B

Please complete Part B of this form for each representation you wish to make. You only need to complete Part A once

1. Which paragraph or policy (or to the proposals map) of the Local Plan does your representation relate to?

Paragraph Policy Proposals Map

2. If your representation is an objection it must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation to one of the Tests of Soundness.

Is your representation concerned with:

- Not complying with legal requirements/
duty to co-operate
Not meeting the Test of Soundness

Please refer to the guidance notes at the rear of this form for further information on the Tests of Soundness.

3. If your representation is an objection because of the Local Plan not meeting a Test of Soundness, what Test of Soundness do you consider it fails?

- The positively prepared test
The justification test
The effectiveness test
The test of consistency with national policy

4. Please make your comments below (they need to be made in reference to not meeting legal compliance or the Tests of Soundness). This should cover succinctly the evidence and supporting information necessary to support/justify your representation and any suggested changes you are proposing. After this stage further submissions will only be at the request of the examination Inspector.

You can continue your comments on a separate sheet if necessary.

In the Updated National Waste Planning Policy – Planning for Sustainable Waste Management – Consultation document, there is emphasis on the need to 'increase the use of waste as a resource' (Paragraph 19). Paragraph 5.2 of the Minerals and Waste Local Plan recognises waste as a resource, however this recognition is not followed through into the subsequent supporting text. In particular, in paragraph 5.31 (or a new paragraph 5.32) there is an opportunity to introduce support for waste management proposals that clearly demonstrate that they are treating waste as a resource. This could include the scale of capital investment, the creation of jobs and the beneficial effect on the local economy. In other words, to treat the waste inputs in a similar way to inputs to other industrial operations.

This would make it clear, especially to communities near to where new facilities are being proposed, that waste is no longer seen as a problem that no-one wants near them, but as a commercial opportunity that could bring benefits to the local area.

Catchment Area policy has not been reviewed during this review process, despite this new emphasis on waste as a resource.

5. If your representation is seeking a change to the Local Plan, what change do you think should be made?

Paragraph 5.31 should read:

Where particular management methods have been shown to be sufficient through the plan period, or for part thereof, proposals would have to demonstrate how the proposal promotes the development of a sustainable waste network and facilitates delivery of the County's waste management capacity requirements (as per Policy 13). Where this capacity would be surplus to our requirements it would be prudent to demonstrate a wider need for the facility and ~~that~~ the benefits for the receiving environment (including the community) ~~outweigh potentially adverse impacts of the county acting as a net importer of waste, e.g. such as impacts on sustainable transport e.g. capital investment, new jobs, environmental enhancements.~~ **This reinforces the importance of communities taking more responsibility for their waste and encouraging sustainable transport movements (and in doing so identifying the origin of waste being managed within the county).**

The section on Catchment Areas for waste management and disposal (paragraphs 2.35 – 2.38) and other references – paragraphs 1.6, 5.41, 5.62, 5.104-5.112, 6.7 and Policy 23, 6.52, 6.97 should be the subject of an early review, as this policy and approach does not reflect the emerging National Waste Policy.

6. If your representation is seeking a change to the Local Plan, do you consider it necessary to present this to the inspector at a public session of the examination?

Yes No

7. If you wish to participate at a public session of the examination, please outline why you consider this to be necessary.

To discuss how modern waste management is like many other industrial operations.

Further copies of this response form have been made available on our website at <https://consult.northamptonshire.gov.uk> or hard copies can be sent on request.

You can forward your completed response forms by e-mail to planning@northamptonshire.gov.uk

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