

Minerals and Waste Draft Local Plan Consultation

Cambridge City Council and South Cambridgeshire District Council joint response

Paragraph 2.3

General comment

There is a point around the way in which consultations on planning applications for minerals or waste operations are handled, and the extent to which specific neighbour notifications are utilised. There has been an instance in the Greater Cambridge area in the recent past where only immediately adjoining neighbours were notified, but there was a feeling locally that the proposals were of a scale to warrant wider notification of those that may potentially be impacted. Can the Minerals and Waste Authority consider bespoke mechanisms for notification near to minerals or waste operations, including the proposed routes for HCV movements?

Paragraph 2.5

General comment

The Councils welcome this opportunity to comment on the emerging MWLP, and seek assurances from the County Council that continued opportunities to engage in a meaningful way to the further preparation of the MWLP will be available. It would be anticipated that specific meetings and discussions would be available between the planning teams to discuss concerns and issues raised in accordance with the Duty to Cooperate.

Table 2 – Plan and Sustainability Appraisal Objectives

Object

While the main principles behind the objectives contained within this table are supported, insufficient emphasis has been given to minimising the impacts of mineral and waste proposals on communities that may be impacted directly or indirectly by the development, including when considering traffic movements. It should be made clear that the impacts on communities may not be restricted only to those in the immediate vicinity, and indeed the potential impacts of increased HCV movements can be significant at some distance from an active minerals or waste operation.

Under the Sustainable Waste Management heading (#2), there is reference to “the waste hierarchy” and “net waste self-sufficiency”. These are important terms used throughout the MWLP and are not clearly defined early in the document to aid the reader. It would be helpful if definitions/explanation could be provided.

In relation to the resilience and restoration objective, national policy requires that development does not increase the risk of flooding to areas downstream or adjacent to developments, but consideration has only been given in this table to flood risk to minerals and waste developments themselves. We would recommend that reference to minimise risks to communities adjacent to proposals be included in this table.

Further, sections 7, 11 and 12 of Table 2 must also include reference to the need to avoid and minimise the impacts to communities of Heavy Commercial Vehicle (HCV) traffic, ensuring appropriate access and routing is secured in connection with the implementation of proposed Policy 23 “Traffic, Highways and Rights of Way”. This must also take account of the specific features and characteristics of any proposed preferred route, including the proximity of individual buildings to the carriageway, the width of the carriageway and any pavements. Reference to the potential nuisance caused by vibration should also be added to section 12 of Table 2.

Policy 1: Sustainable Development and Climate Change

Object

The broad approach to achieving sustainable development and responding to, and mitigating the risks of climate change is welcomed.

Criterion (a) could usefully be expanded to include a wider reference to wellbeing, and it is suggested that the final line should read "...human health, **wellbeing** and air quality;"

However, we would recommend that criterion (f) of the policy be reworded to read "incorporation of sustainable drainage schemes to minimise flood impacts, reduce current flood risk and provide additional benefits including contributing to biodiversity net gain and improvements to water quality". This change would bring the policy into line with national policy requirements in relation to reducing flood risk and also proposed changes to national policy in relation to introducing mandatory biodiversity net gain requirements for new developments.

Paragraph 3.21 - 3.22

Object

These two paragraphs identify that the allocation at Black Fen/Langwood Fen, Mepal is currently retained from the existing MWLP, but has failed to deliver at the rate expected. It is not yet fully consented. A recent planning application to Cambridgeshire County Council was refused as the proposal was not in accordance with the Core Strategy or the adopted Masterplan. Assurances are sought from the owner and operator by the County Council that a policy compliant scheme will be forthcoming for the area. If these assurances are not received, the Councils are currently minded to remove the allocation.

This position takes into account the need to demonstrate deliverability, and clearly if there is doubt around this matter the Councils should take appropriate action. What is not clear from these paragraphs or the rest of the Plan, is how the requirement for sand and gravel extraction will be met if this significant site is no longer allocated. The potential implications for Greater Cambridge are therefore not clear. The consultation that took place in 2018 set out that a further Call for Sites was being undertaken in parallel to identify further potential sites for sand and gravel extraction. This exercise and its outputs are not referenced in the Draft MWLP. The Councils object to the lack of demonstrable alternative strategy should the existing allocation be removed.

Policy 2: Providing for Mineral Extraction

Object

There is uncertainty around the allocations at Block Fen/Langwood Fen, which together total 7.46Mt of sand and gravel reserve. This is approximately 40% of the 18.775Mt of new allocations identified in the draft MWLP. This is a significant proportion of the allocations identified for sand and gravel extraction, and there are no alternative sites proposed for potential allocation if this site is not allocated in the pre-submission Plan. The Councils must therefore object on the basis of this uncertainty, as it is not clear what the implications would be should alternative allocations be necessary.

There is overall support for the principle of seeking extensions to existing sites over allocation of new sites. However the impacts of proposed extraction sites must consider fully the implications of operations on communities.

In respect of operations at Bare Fen & West Fen, Willingham/Over (M019) it is recognised that this allocation is broadly similar to that which is allocated by the adopted MWLP (2011 and 2012). Where HCV movements are considered in this location, care must be taken to avoid where possible and minimise and mitigate, if avoidance is not possible, the impact of traffic movements through villages such as Willingham and Over.

The proposed allocations at both Mitchell Hill Farm South (M021) and Chear Fen (M022) in Cottenham are extensions to existing operations. There is local concern about the capacity and suitability of the local road network, and in particular the A10. The Councils seek

assurances from the County Council that increases in traffic through villages are avoided where possible and minimised and mitigated if avoidance is not possible.

Policy 3: Waste Management Needs

Support

The Councils support the policy approach to achieve net self-sufficiency in relation to the management of waste arising from within the Plan area.

Policy 4: Providing for Waste Management

Object

Policy 4 contains a number of approaches to different elements of waste management, and the Councils support some elements of the approach and objects to others. Recognising that there is sufficient capacity to meet the majority of waste management needs within existing allocations, the need for significant additional allocations is reduced. The approach proposed has both advantages and disadvantages, and more clarity is required via conversations under the Duty to Cooperate before the Councils will be in a position to confirm whether there would be support or objection to this policy. The Councils support that existing waste management sites across Greater Cambridge, where these benefit from planning consent and other necessary licences, should continue to operate to ensure the overall delivery of the waste hierarchy in acceptable locations where there are opportunities to minimise environmental damage via resource depletion and excess emissions from increased transport miles. The policy or supporting text should make clear what is meant by “moving waste up the waste hierarchy”. This may be better addressed in connection with comments made on Table 2.

The flexibility introduced by this approach, and a focus on key broad locations within the overall Plan area is broadly welcomed. An advantage to this approach is that land will not be unnecessarily sterilised from other uses by an allocation for waste management. However there are concerns around whether this approach will deliver the scale of waste management facilities required, particularly if there is a reliance on the market bringing forward proposals through the Development Management process only. By not identifying specific sites, or even broad locations, there is a reliance on the Minerals and Waste Authorities engaging at an early stage in the preparation of Local Plans and Site Allocations to identify where they may consider waste management provision should be made, and what type of facility is required. The Councils seek assurances from the County Council that there are sufficient resources available to engage at an early stage, and to maintain that resource during the preparation of Local Plans and other relevant planning documents.

Further consideration of whether such spaces are available in the centres listed is required. Not all the locations identified have undeveloped employment allocations in the Cambridge and South Cambridgeshire adopted Local Plans of the nature and scale envisaged. Some sites may also not be suitable for a use which would encourage vehicular traffic to visit an area, due to the traffic conditions and planning objectives of the area. Whilst such uses may be compatible in an employment or industrial setting, the job density of such operations is likely to be low. This may therefore have an impact on the overall employment strategy for Greater Cambridge, and the employment land supply at the site level. It could also cause local issues around compatibility of uses.

It is not clear from this draft Policy whether the existing allocation for a waste management site at Northstowe is still required, either at all, or within its current location. This uncertainty is hampering delivery of the Enterprise Zone, and has implications for securing employment provision at the new town which will aid delivery of a sustainable settlement. Further clarification regarding this matter is urgently required.

The proposal to address the demand for waste management proposals as part of new strategic development areas has potential. However, clarity is required on specifically what is meant by waste management facilities in this context. The scale of facility required is not clear, and whilst the policy sets out that this must be “of a scale, use and accessibility to enable communities and businesses within that strategic development area to take some responsibility for their own waste”, there is no information in the policy or supporting text on what might be needed for a development of 1,500 or more homes. Further clarity on this point would be welcomed.

The policy and supporting text make no reference to the existing operations at Milton, and it had been understood that this may be due to close over the next few years. Clarity on this position is required to fully understand the strategy for waste management across Greater Cambridge.

Policy 4 makes reference to Waterbeach. It is assumed this is a reference to the planned new town north of Waterbeach. This should be made explicit.

Waste Management Facilities – Inert Disposal. Is there a “not” missing in (d)? i.e. “...an alternative site would **not** be more suitable...”.

Policy 5: Minerals Safeguarding Areas

General comment

Clarity is required around the operation of the Minerals Safeguarding Areas in and around Cambridge. The policies map appears to exclude the whole of Cambridge.

Policy 10: Waste Management Areas

Object

The North East Cambridge Area Action plan will be looking comprehensively at an area of Cambridge to bring forward development for employment, housing and other supporting uses and facilities. In order to make best use of the land around the new station where significant investment has taken place on transport infrastructure, it may be necessary to consider whether the site remains the most appropriate location for future waste uses. The County Council have previously acknowledged the potential need for relocation of uses in their response to the North East Cambridge Area Action Plan Issues and Options consultation earlier this year. GCSP seek continued assurance from the County Council and the MWLP that this flexibility to consider a comprehensive approach remains, and that meaningful dialogue on this matter can continue. Additional supporting text on this matter would be welcomed, and particularly around the application of “normal” in these circumstances.

Policy 11: Water Recycling Areas

Object

This policy would be applied where there are applications for new Water Recycling Facilities. It is questionable whether the second part of paragraph d regarding land value realisation is sound. It is not clear how it would be interpreted, and there is no explanation of justification for the point provided in the plan. Releasing land value may be necessary to support a range of policy goals that deliver sustainability benefits. North East Cambridge is a case in point. The policy already requires evidence of need, which is sufficient.

Policy 15: Transport Infrastructure Areas (TIAs)

Object

The need to protect such areas is acknowledged. However, the plan does not reference seeking opportunities for new infrastructure, including railheads. With planned new rail schemes in the area, there will be new opportunities to explore which could deliver better locations, particularly where current facilities create issues for the planning of urban areas,

and the maximisation of the benefits of sites like North East Cambridge. The plan should provide a hook for exploring this.

Where applications for new, extended or upgraded railhead operations are being considered, the County Council should consider incorporating requirements to address the need for mitigation measures to reduce nuisance that can arise by way of dust, noise and air pollution. This could incorporate measures such as damping down of dust, and use enclosed conveyor belts rather than cranes to move aggregates.

Policy 18: Amenity Considerations

Support

It is vital that any new or extended mineral or waste operations seek to minimise any impacts on communities that are directly and indirectly impacted in terms of factors which may impact on quality of life. Policy 18 addresses a number of these points, but to address local concerns must explicitly state that these factors also include the impact of associated traffic movement.

Criterion a. should be expressed as “risk of harm” not “harm”

Criterion b. it is not clear on what basis any assessment of the ongoing operation(s) of neighbouring (or planned neighbouring) land uses will be conducted. Where these neighbouring uses are residential, this must also include the ability to continue to live in the property without significant harm or impact on amenity.

Criterion d. must be expanded to include all communities that are impacted not just those nearby. The impact of traffic movements must be considered along the whole route.

The text at the end of the policy is not completely clear, and the meaning of “deliverability” in this context is ambiguous. Could this whole sentence be made clearer – “...to establish the extent to which the impacts on the amenity of any land or property would be considered to be acceptable after incorporating the effects of any planned mitigation measures.”

Policy 22: Water Resources

Object

While the policy on the whole is supported, it should be noted that it is not possible to use Supplementary Planning Documents to develop new policies. As such, we would recommend that the final sentence of the policy be amended to read “Proposals should also have due regard to the latest guidance in the Cambridgeshire Flood and Water SPD and the Peterborough Flood and Water Management SPD (or their successors).

Policy 23: Traffic, Highways and Rights of Way

Object

The potential impacts of increased HCV movements are of concern to residents and wider communities that are near to minerals and waste operations or routes. The Councils are supportive of the requirements of Policy 23 to address these concerns, but also request that additional requirements are added to (e) which set out that monitoring and reporting of traffic movements will be required.

In d. It is not clear what “severe residual cumulative impacts” means, and whether this relates to the increase in number of traffic movements and a change in the type of traffic using the routes i.e. increases in HCV movements, or the absolute volume of traffic on a given route. In either case, the impacts will depend on the specific characteristics of the area and the key routes that lead to the minerals or waste operation. It can be the case that the traffic movements cause significant local concern, rather than necessarily the operation itself. Further clarity is required, and the Councils would welcome discussion on this matter.