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12 September 2011

To: Councillor Tim Wotherspoon, Portfolio Holder

Trisha Bear
Lynda Harford
Tumi Hawkins
Clayton Hudson

Mike Mason

Bunty Waters

Opposition Spokesman
Opposition Spokesman
Opposition Spokesman
Scrutiny and Overview Committee
Monitor
Scrutiny and Overview Committee
Monitor
Scrutiny and Overview Committee
Monitor

Dear Sir / Madam

You are invited to attend the next meeting of **NORTHSTOWE AND NEW COMMUNITIES PORTFOLIO HOLDER'S MEETING**, which will be held in **MONKFIELD ROOM, FIRST FLOOR** at South Cambridgeshire Hall on **TUESDAY, 20 SEPTEMBER 2011** at **2.00 p.m.**

Yours faithfully
JEAN HUNTER
Chief Executive

Requests for a large print agenda must be received at least 48 hours before the meeting.

AGENDA

	PAGES
PROCEDURAL ITEMS	
1. Declarations of Interest	
2. Minutes of Previous Meeting The Portfolio Holder is asked to sign the minutes of the meeting held on 23 June 2011 as a correct record.	1 - 4
DECISION ITEMS	
3. Cambridgeshire Green Infrastructure Strategy The Appendices are available on the Cambridgeshire Horizons website by following the relevant links from www.scambs.gov.uk/meetings	5 - 8
4. CAMBRIDGE: Household Recycling Centre South of Addenbrooke's Access road Appendix B (Inspector Note 2) is available on the Council's website by following the relevant links from www.scambs.gov.uk/meetings	9 - 36
5. Minerals and Waste Site Specific Proposals Plan - response to	37 - 50

consultation by Cambridgeshire County and Peterborough City Councils on suggested changes to the plan

Appendices A and B (significant and minor changes) are available on the Council's website by following the relevant links from www.scambs.gov.uk/meetings

6. **Response to consultation by Cambridgeshire County Council and Peterborough City Council on the draft RECAP Waste Management Design Guide Supplementary Planning Document** 51 - 80

Appendix 3 (response to representations) is available on the Council's website by following the relevant links from www.scambs.gov.uk/meetings

7. **Draft National Planning Policy Framework: response to consultation** 81 - 88

Appendix A (draft response) is available on the Council's website by following the relevant links from www.scambs.gov.uk/meetings

INFORMATION ITEMS

8. **Phase 2 detailed Water Cycle Strategy to 2031 - major growth areas in and around Cambridge** 89 - 96

A link to the Water Cycle Strategy on Cambridgeshire Horizons' website is available on the Council's website by following the relevant links from www.scambs.gov.uk/meetings

9. **Service Improvements & Financial Performance 2011/12: 1st Quarter** 97 - 110

STANDING ITEMS

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The Portfolio Holder will maintain, for agreement at each meeting, a Forward Plan identifying all matters relevant to the Portfolio which it is believed are likely to be the subject of consideration and / or decision by the Portfolio Holder, Cabinet, Council, or any other constituent part of the Council. The plan will be updated as necessary and published on the Council's website following each meeting. The Portfolio Holder will be responsible for the content and accuracy of the forward plan.

11. **Date of Next Meeting**

The next meeting of the Northstowe and New Communities Portfolio Holder has been scheduled for Tuesday 15 November 2011 starting at 2.00pm.

OUR VISION

- We will make South Cambridgeshire a safe and healthy place where residents are proud to live and where there will be opportunities for employment, enterprise and world-leading innovation.
- We will be a listening Council, providing a voice for rural life and first-class services accessible to all.

OUR VALUES

We will demonstrate our corporate values in all our actions. These are:

- Trust
- Mutual respect
- A commitment to improving services
- Customer service

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SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

Minutes of the Northstowe and New Communities Portfolio Holder's Meeting held on
Thursday, 23 June 2011 at 2.00 p.m.

Portfolio Holder: Tim Wotherspoon

Councillors in attendance:

Scrutiny and Overview Committee monitors: Mike Mason and Bunty Waters

Opposition spokesmen: Trisha Bear and Lynda Harford

Also in attendance: Ray Manning, Alex Riley, Bridget Smith,
Hazel Smith and John Williams

Officers:

Holly Adams	Democratic Services Team Leader
Jonathan Dixon	Principal Planning Policy Officer (Transport)
John Garnham	Principal Accountant (General Fund and Projects)
Keith Miles	Planning Policy Manager
Jo Mills	Corporate Manager, Planning and New Communities

1. DECLARATIONS OF INTEREST

There were no declarations of interest.

2. MINUTES OF PREVIOUS MEETINGS

The minutes of the 13 April 2011 Northstowe Portfolio Holder's meeting were approved.

The minutes of the 19 May 2011 New Communities Portfolio Holder's meeting were approved subject to the incorporation of the following amendments:

- Minute 62, Gamlingay: Educational Provision – "Councillor Nick Wright also expressed concern ~~concerns~~ and said..."
- Minute 66, Forward Plan – "Councillor Bridget **Smith** paid tribute..."

3. GOVERNMENT CONSULTATION ON DRAFT PPS PLANNING FOR TRAVELLER SITES

The Portfolio Holder considered a suggested response to the government consultation on the draft new Planning Policy Statement (PPS) "Planning for Travellers", which had been long awaited and would have a significant influence on how the Council completed its Gypsy and Traveller Development Plan Document (DPD).

In response to questions, it was confirmed that:

- The PPS would apply to the Council as a material planning consideration when submitting the DPD;
- Regional targets were to be removed and it would be necessary to develop and consult on local targets;
- The Draft PPS drew parallels with the "Planning for Housing" PPS 3, and in the absence of a demonstrable five year land supply, the Council would be required to consider favourably applications for temporary planning consents. This is stronger than the guidance regarding temporary consents in current circular;
- The response focussed primarily on plan making as this was the major issue

- locally, but details about enforcement costs could be included;
- The response sought to have included in the PPS an acknowledgement of the opportunity afforded by major development sites to address Gypsy and Traveller site provision;
- It was unknown how the forthcoming Duty to Co-operate with neighbouring authorities would operate, but this would be a factor in the development of local targets; and
- The Gypsy and Traveller Accommodation Needs Assessment is being undertaken in partnership across a range of authorities, to help avoid any double-counting and to ensure that the figures are robust.

Officers were thanked for their thorough review and response.

The Northstowe & New Communities Portfolio Holder **AGREED** to respond to the government consultation on the draft new Planning Policy Statement (PPS) "Planning for Travellers" with the comments set out in Appendix 1 to the report, subject to the following amendments, the wording of which to be finalised by officers in consultation with the Portfolio Holder:

- A summary of this Council's enforcement and appeals experiences under the heading "Other Matters";
- Recognition that, as in the settled community, the travelling community was comprised of different groups, often with different needs, for which a single target might not be appropriate;
- To seek clarity whether the relationship between the number of pitches and plots and the size and density of the surrounding population (Policy B paragraph 9f) was positive or inverse; and
- To address minor typographical errors before submission.

4. **GOVERNMENT CONSULTATION ON RELAXATION OF PLANNING RULES FOR CHANGE OF USE FROM COMMERCIAL TO RESIDENTIAL**

The Portfolio Holder considered the proposed response to the government consultation on proposals to relax planning rules to allow the change of use from commercial (B use classes) to residential (C3 use classes) without planning permission. This proposal attempted to address an apparent over-supply of employment land and undersupply of housing; however, it was felt by those present at the meeting that the proposal was better suited for urban centres and not rural districts.

The importance of maintaining the sustainability of South Cambridgeshire villages was key to the District remaining resilient. Without the requirement for planning permission, commercial use properties could be converted into residential areas without any assessment of the impact on local education and health provision, or section 106 or affordable housing contributions. Loss of opportunities for village employment would lead to increased traffic as more residents had to travel to work. Officers were commended for a thorough response.

The Northstowe & New Communities Portfolio Holder **AGREED** to respond to the government consultation on proposals regarding relaxation of planning rules for change of use from commercial (B use classes) to residential (C3 use classes) with the comments set out in Appendix 1 to the report, subject to the following amendments, the wording of which to be finalised by officers in consultation with the Portfolio Holder:

- When responding to Question E about whether or not the full range of possible issues has been identified, to include specific reference to the impact of the proposals on the Green Belt and on conservation areas; and
- To elaborate further on the impact on nearby commercial users of the presence of

residential users.

5. **PERFORMANCE MEASURES 2011-12**

The Corporate Manager (Planning & New Communities) clarified that the performance measures in this report referred to the current year and not the previous year as had appeared in paper copies of the agenda. The Northstowe & New Communities Portfolio Holder **AGREED** in principle the proposed performance measurements identified in paragraphs 8-12 of the report and **NOTED** that these measurements could be revised mid-year as the programme evolved.

6. **FINANCIAL MONITORING REPORT 2010-11 - FINAL**

The Principal Accountant (General Fund and Projects) presented the 2010/11 year-end financial monitoring report and explained that, in light of the re-allocation of Cabinet responsibilities on 23 May 2011, figures relating to services previously in the separate New Communities Portfolio and Northstowe Portfolio, but which were not part of the Northstowe & New Communities Portfolio, would be reported to the relevant Portfolio Holders under the new Cabinet structure. The figures showed that 91% of the revenue budget had been spent and the report set out the reasons for the underspend. It was clarified that the word 'overspent' in the table at Appendix A was an error and should not have appeared.

The Northstowe & New Communities Portfolio Holder **NOTED** the revenue and capital expenditure for the Portfolio budget for the year ending 31 March 2011.

7. **FORWARD PLAN**

The Portfolio Holder confirmed the content of the Forward Plan. In response to questions, it was clarified that:

- Grant applications were now to be determined by the Leader;
- The Gypsy and Traveller Accommodation Needs Assessment results would be considered by the Housing Portfolio Holder as the process was led by the Strategic Housing Market Assessment (SHMA); and
- The Water Cycle Strategy and the Strategic Flood Risk Assessment were two separate, yet complementary, pieces of work.

8. **DATE OF NEXT MEETING**

The Portfolio Holder asked those present to note that the August and October meetings had been re-scheduled to September and November respectively.

The next meeting would be on Tuesday 20 September 2011 at 2pm.

The Meeting ended at 3.45 p.m.

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SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Northstowe and New Communities Portfolio Holder 20 September 2011
AUTHOR/S: Executive Director (Operational Services) / Corporate Manager (Planning and Sustainable Communities)

CAMBRIDGESHIRE GREEN INFRASTRUCTURE STRATEGY**Purpose**

1. The purpose of this report is to:
 - (a) Update the Portfolio Holder on the completion and publication of the Green Infrastructure Strategy and how the delivery of the Strategy will be overseen
 - (b) Seek the Portfolio Holder's endorsement of the final, published Strategy
2. This is a key decision because it is likely to be significant in terms of its effects on communities living or working in an area of the District comprising all wards.

Recommendation

3. That the Portfolio Holder agrees to endorse the final Cambridgeshire Green Infrastructure Strategy.

Reasons for Recommendations

4. To give the Council's formal approval and support for the Strategy and its delivery, alongside that of other Cambridgeshire local authorities.

Background

5. The first Green Infrastructure Strategy for the Cambridge Sub-region was developed in 2006 by The Landscape Partnership, on behalf of Cambridgeshire Horizons and partners. It was one of the first in the region and planned the delivery of Green Infrastructure for the next 20 years.
6. A review of this Strategy has been carried out and a new Cambridgeshire Green Infrastructure Strategy completed and published (Appendix A). The new Strategy covers the whole of the county, provides a stronger evidence base benefiting from public consultation, is better able to support development planning and management, and can inform and more effectively gain Community Infrastructure Levy (CIL) and other sources of funding.
7. The revised Strategy includes a Strategic Network of Green Infrastructure for Cambridgeshire which provides the context for the planning and delivery of Green Infrastructure at sub-regional, local and community scales. It identifies the benefits that can be achieved from Green Infrastructure including for a broader set of issues.
8. The four objectives of the new Green Infrastructure Strategy are to:

- (a) Reverse the Decline in Biodiversity in Cambridgeshire
 - (b) Mitigate and Adapt to Climate Change
 - (c) Promote Sustainable Growth and Economic Development
 - (d) Support Healthy Living and Wellbeing
9. The Strategy identifies six Strategic Areas, plus Target Areas and Projects. A large part of the District is covered by the Cambridge and Surrounding Areas Strategic Area, with Target Areas at Northstowe, Wicken Fen and Anglesey Abbey, Cambridge, Cambourne, Wimpole, and West Cambridgeshire Woodlands. The Great Ouse Strategic Area contains Fen Drayton (Lakes), which is identified as a Target Area.
10. The Strategy was prepared in partnership between Cambridgeshire Horizons, the local authorities, and other organisations with a key role to play in forming and delivering the Strategy including the National Trust, Wildlife Trusts, Natural England and the Environment Agency.

Considerations

Public Consultation and the completion of the Strategy

11. Public consultation by Cambridgeshire Horizons on the new draft Green Infrastructure Strategy was planned for the first part of 2010, and a report on the consultation draft was taken to the New Communities Portfolio Holder meeting on 2 March. This report gave background on Green Infrastructure, its benefits and policy context, and the existing Green Infrastructure Strategy. It described how the consultation draft had been prepared and improvements made during its development, and identified a number of areas where further improvements were needed. The Portfolio Holder agreed the Council's response to the consultation, which gave general support to the development of a Green Infrastructure Strategy but noted that major changes would be required to make it acceptable. Council officers would work with other partners to achieve the necessary changes.
12. The public consultation was carried out between January and March 2010. The responses generally reflected that of the Council in supporting the principles and benefits of Green Infrastructure, and many elements of the consultation draft, but asking that significant changes be made. Following the consultation substantial work has been done to make the changes requested.
13. A second round of consultation was arranged on the revised version of the Strategy, given the major changes that had been made. Following the first round, it was considered particularly important that local authorities should be satisfied with the consultation draft, and would not need to raise more than relatively minor issues during the consultation.
14. A report on the development of the Strategy and the second round of consultation was taken to the New Communities Portfolio Holder meeting on 25 January 2011. The report noted that the Strategy had been greatly improved but listed some remaining areas where further work was needed. Delaying the planned consultation would, however, have serious implications. The Portfolio Holder agreed to support the broad approach of the Strategy and that further changes should be made to it before its publication for public consultation. The Corporate Manager was given delegated authority to endorse an acceptable revised version for public consultation with the Portfolio Holder, and the further changes to the Strategy required by this Council were made prior to the public consultation.

15. The second round of consultation took place between 3 March and 3 April this year. It received a lower number of responses than the first round, at least in part because the second draft had addressed comments made on the first draft, particularly in relation to the overall approach and structure of the Strategy. A number of the responses dealt with issues specific to particular areas and sites and some changes were made as a result. Following our input to the development of an acceptable public consultation draft we made no additional comments in response to the consultation. Overall, no substantial changes were made to the Strategy following the consultation.
16. The Cambridgeshire Horizons Board agreed to sign off the final Green Infrastructure Strategy for publication on 27 June 2011 and it was published in July. Local authorities have been endorsing the Strategy according to their different decision making procedures and timetables.

Delivery of the Strategy

17. In order to be successful the Strategy has to influence and support approaches and decision-making across a wide range of areas and, above all, achieve significant improvements on the ground.
18. The responsibilities for delivering the Strategy are spread across a number of organisations. Local authorities have a key role to play in securing Green Infrastructure through development planning and management, in managing existing and new Green Infrastructure, and in supporting and facilitating other organisations and communities to deliver the Strategy. The Strategy will form an evidence base for the review of the Local Development Framework.
19. The Green Infrastructure Officer post at Horizons made a major contribution to developing the Strategy, and co-ordinating and instigating the delivery of Green Infrastructure. The loss of this post means that other organisations will need to consider how their resources can best be used to ensure the implementation of the Strategy.
20. The Green Infrastructure Forum has been overseeing the development of the Strategy, chaired and supported by Horizons. Under a new Chairperson, the Green Infrastructure Forum will continue to operate following September 2011. The Forum will act as a central hub to co-ordinate and lead work on Green Infrastructure across Cambridgeshire, focusing particularly on delivery of Green Infrastructure projects. All of the organisations represented on the Forum have committed to this, recognising that in the current climate of reduced public sector funding, Green Infrastructure outcomes can best be achieved through this type of partnership working. The Forum also has a role in terms of responding to new initiatives and policies which effect and create opportunities for Green Infrastructure such as the Government's Local Nature Partnership proposals.

Options

21. Options available are to:
 - (a) Accept the recommendations of this report
 - (b) Decide not to endorse the final, published Green Infrastructure Strategy

Implications

22. Financial	Within existing budgets.
Legal	None.
Staffing	Staff will need to contribute to the delivery of the strategy.
Risk Management	There is no general risk in endorsing the Green Infrastructure Strategy on the basis that it has followed national policy and guidance and proper processes.
Equality and Diversity	Green infrastructure includes sustainable movement and other themes, which improve access, recreation and exercise for disabled people, and encourage wider involvement in and enjoyment of the heritage and the natural environment.
Climate Change	One of the four objectives of the Strategy is to Mitigate and Adapt to Climate Change, and climate change is a key theme of the Strategy.

Consultations

23. Two rounds of extensive public consultation have taken place in 2010 and 2011.

Consultation with Children and Young People

24. The public consultation was open to children and young people but these groups were not specifically targeted.

Effect on Strategic Aims

25. The Green Infrastructure Strategy is closely aligned with and will add to a wide range of Council Aims and Approaches.

Conclusions / Summary

26. The review of the Green Infrastructure Strategy has been completed following substantial development work and two rounds of public consultation. The Council has had an important role contributing information and helping to give direction and make improvements. The Council was satisfied with the Strategy that was the subject of a second round of consultation and no substantial changes have been made to it following the consultation. The Strategy has been endorsed by the Cambridgeshire Horizons Board and published, and is being endorsed by all the local authorities in the county. The report recommends that the Strategy be endorsed by this Council.
27. The report also provides an update on arrangements for co-ordinating the delivery of the Strategy through the Green Infrastructure Forum, with the end of Cambridgeshire Horizons.

Background Papers: the following background papers were used in the preparation of this report:

- Report to the Cambridgeshire Horizons Board on 27 June 2011

Contact Officer: David Bevan – Conservation & Design Manager
Telephone: (01954) 713177

Appendices

Appendix A: Cambridgeshire Green Infrastructure Strategy

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Northstowe and New Communities Portfolio Holder 20 September 2011
AUTHOR/S: Executive Director (Operational Services) / Corporate Manager (Planning and New Communities)

CAMBRIDGESHIRE AND PETERBOROUGH MINERAL AND WASTE SITE SPECIFIC PROPOSALS DEVELOPMENT PLAN DOCUMENT - ALLOCATION FOR A HOUSEHOLD RECYCLING CENTRE TO THE SOUTH OF ADDENBROOKE'S ACCESS ROAD

Purpose

- 1 The purpose of this report is to respond to a request received from the Inspector of the examination into the Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (SSPP). He has indicated to Cambridgeshire County and Peterborough City Councils that he is minded to delete the allocation for Site W1X from the SSPP. This site allocation is for a Household Recycling Centre (HRC) to the South of the Addenbrooke's Access Road. The plan making authorities have responded to this and the opportunity is now being given to all those respondents to the Plan who made representations with respect to this allocation, including the District Council.
- 2 This is a key decision because if this site is not allocated in the SSPP an alternative site will need to be found and this is highly likely to be within the South Cambridgeshire District and would therefore impact on wards to the south of Cambridge City – possibly Hauxton, Harston, Gt Shelford, Lt Shelford and Stapleford or wards further afield such as Whittlesford, Newton, Fowlmere, Foxton, Barrington and Haslingfield. It has not been published in the forward Plan because it is a recent request received on 4 August 2011.

Recommendations

- 3 That the Northstowe and New Communities Portfolio Holder:
 1. Agrees to reaffirm this Council's support for the site allocation for a HRC to the South of the Addenbrooke's Access Road to remain in the Site Specific Proposals Plan and to support the comments made by Cambridgeshire County and Peterborough City Councils on this matter.
 2. Asks that the Inspector does not include within his report a request for South Cambridgeshire District Council during the forthcoming review of its Local Development Framework to have to consider removing land from the Green Belt specifically for a HRC to serve the south of Cambridge.

Reasons for Recommendations

- 4 South Cambridgeshire District Council recognises that many alternative options were considered by Cambridgeshire County and Peterborough City Councils in finding a suitable site for an HRC to serve the area to the south of Cambridge and that the proposed site south the Addenbrooke's Access Road is the best and most sustainable option.

Executive Summary

- 5 The Inspector of the examination into the Cambridgeshire and Peterborough SSPP is considering deleting the allocation for an HRC on land to the south of the Addenbrookes Access Rd. Many alternative sites had been considered at earlier stages in the preparation of the SSPP. The Inspector has stated his reasons as site contrary to Green Belt policy and Cambridge Local Plan; will affect setting of city; will impact purpose of proposed Waste Consultation Area and he questions deliverability of site. Since development in area has slowed need for HRC could wait for early review of SSPP.
- Cambridgeshire County and Peterborough City Councils have responded – reaffirming need for HRC; site consistent with Green Belt and Local Plan; new facility so will be designed to mitigate impact on surrounding area; development in this area has not slowed therefore allocating site for HRC could not wait for partial review of SSPP; site is deliverable.
- South Cambs response to this is – site is close to where community lives who will use recycling centre – sustainable; new facility so can be designed with buffers to reduce impact on surroundings; development on southern fringe of city is progressing at fast rate and HRC is needed – cannot wait for partial review of SSPP; any site proposed for HRC will generate objections but need to weigh against need for facility; most sustainable location.
- Inspector has mentioned Hauxton as alternative area of search for HRC – already considered and rejected. Has same problems as site Inspector is considering deleting – site would be in Green Belt; close to both existing community in Hauxton and new residents once Bayer CropScience site is developed; impact on surrounding area. Has been suggested that when South Cambs reviews its LDF that site be taken out of Green Belt for HRC. Object to this – existing site allocation should be retained in SSPP. If site is deleted will not be easy to find alternative suitable site in partial review.

Background

- 6 Cambridgeshire County and Peterborough City Councils have been preparing their Minerals and Waste Development Plan (MWDP) for some 5 years and at each stage of public consultation South Cambridgeshire District Council has taken the opportunity to make representations on the draft proposals. The Minerals and Waste Core Strategy DPD has now been adopted and contains within it Policy CS16 for Household Recycling Centres. This policy states that '*A network of household recycling facilities easily accessible to local communities will be developed through the Site Specific Proposals Plan...*' There are a number of broad locations listed in the policy for new HRCs and one is to serve Cambridge South.
- 7 In the earlier stages of the MWDP there have been a number of different sites considered for an HRC to serve the area to the South of the City. Cambridgeshire County and Peterborough City Councils have carried out extensive testing and assessment of land to find a site that is suitable. It must be one that is deliverable and able to serve the residents to the south of Cambridge in a sustainable way so that it is located near to where there is the highest demands from residents and that people do not have to travel long distances to dispose of their waste. It was in the Preferred Options 2 of the MWDP that the current site was indicated as the preferred site. South Cambs responded to the Preferred Options 2 consultation in 2008 and the Cabinet on 25 September 2008 recommended support for this site for an HRC. In

that Cabinet report there is a list of the alternative sites¹ that had been considered by Cambridgeshire County and Peterborough City Councils. –

Site Name
Bayer Crop Site East, Hauxton
Cambridge Southern Fringe
Glebe Farm, Trumpington
Thriplow HWRC
Area of Search near M11
Bayer Crop Science Site, Hauxton
Bayer Crop Science Site West, Hauxton
Park and Ride Site at Trumpington
Magistrates Court at the Park and Ride, Trumpington
M11 Area of Search, South of Addenbrookes Access Road
Extension of existing Thriplow HWRC site
Adjacent land at Pet Crematorium Site off A505 near Thriplow
A1307 Corridor (Babraham) – Search Area 1
A1307 Corridor (Babraham) – Search Area 2
A1307 Corridor (Babraham) – Search Area 3
Sawston/Shelford area as part of Babraham Area of Search.
Glebe Farm Area of Search, Trumpington
Trumpington Road, Trumpington
M11 Area of Search – Clay farm
M11 Area of Search – East of A10
M11 Area of Search – Monsanto Site
M11 Area of Search – North of Addenbrookes Access Road
M11 Area of Search – South of Monsanto site
M11 Area of Search – West of A10
Land North of Sawston Village College
Glebe Farm Area of Search 2, Trumpington
Glebe Farm 3
West of M11/A10 junction, Haslingfield + The Eversden/ Trumpington

- 8 The Pre-Submission version of the SSPP included the site allocation for an HRC to the South of Addenbrooke's Access Road (Site W1X). Public consultation was carried out on this plan in February/March 2010
- 9 A Statement of Consultation was produced setting out all the representations received during the Pre-Submission consultation on the SSPP. This has been published on the County Council's website and can be found at the following link – <http://www.cambridgeshire.gov.uk/NR/rdonlyres/B9BB4A86-DAD6-48DF-BC03-1209FFE29F2/0/C11Reg301eSSPPSMaInIssuesReportaa.pdf>
This document shows that a number of representations were received relating to Site W1X – some in support and others objecting. (See pages 33-34 of the document for references to Site W1X).
- 10 During the Pre-Submission consultation on the SSPP South Cambridgeshire submitted representations supporting this site allocation. This representation is contained in Appendix A.

¹ In a further Preferred Options 2 New Sites consultation in January 2009 an additional site for the HRC was proposed in Hauxton

The Current Situation

- 11 An examination has taken place into the SSPP and following the examination hearing about the allocation of Site W1X the Inspector wrote to Cambridgeshire County and Peterborough City Councils indicating that he was (provisionally) minded to recommend deletion of the allocation. The Councils responded to this note. These notes are included in Appendix B of this report.
- 12 Before the Inspector completes his report into the Examination of the SSPP he has invited comments on these two documents from respondents to the Plan who made representations with respect to this allocation. He will take into account these responses. Since South Cambs was one of these respondents, it is able to make further comments to the Inspector. It should be noted that any comments made will have to be limited to matters raised in the Council's original representation.
- 13 The Inspector's note - This highlights his concerns and he gives the following reasons for the allocation being potentially unsound
- Lack of consistency with national policy with respect to the Green Belt and PPS5 (setting of Cambridge as a heritage asset)
 - Lack of conformity with the objectives of the Cambridge Local Plan
 - Lack of consistency with the purposes of identifying Waste Consultation Areas in the Core Strategy
 - Doubts over the robustness of the assessment of the site with respect to the effect on the setting of the city and
 - Doubts over the deliverability of the facility and thereby the effectiveness of the allocation.
- 14 He suggests that since he heard evidence, the need for the facility is now not pressing because housing development locally has slowed down due to the recession, and the allocation can be removed from the SSPP.
- 15 The Inspector mentions representations that he received at the Hearings concerning Hauxton as being an alternative site for an HRC or at least an area of search but recognises that this too suffers from a number of drawbacks.
- 16 Finally, the Inspector concludes that a more measured approach would be for the County and Peterborough Councils to promote a new site within the context of a partial review of the SSPP in due course.
- 17 The Councils Response – Cambridgeshire County and Peterborough City Councils have made a detailed and robust response to the Inspector's comments. They have set out their response as follows –
- They have reaffirmed the need for a new HRC to serve the existing and future residents living in the area to the south of Cambridge.
 - They show how the proposals are consistent with national policy and that the impact on the Green Belt and historic setting of the City has been taken into account when assessing the allocation.
 - The Inspector expressed concerns about the proximity of future residents in the Glebe Farm development. The Councils pointed out that the new HRC would be designed to a high standard using the adopted Location and Design of Waste Management Facilities Supplementary Planning Document. The County Council

has recent experience of developing HRC near to residential areas and mitigation measures would be put in place.

- That contrary to the national situation, development of the Cambridge southern fringe has not slowed down and therefore there will be a need for the HRC in the medium term. A partial review of the SSPP would not be the favoured approach. An exhaustive search for potential sites has been carried out over a 5-year period and there is no evidence to suggest that new sites would be identified in a review process.
- The Inspector questioned the deliverability of the site given that many will object to the future planning application for the HRC. The Councils argued that any proposal for an HRC will generate much local comment but that it is not the volume of objections but their planning merits which must be balanced with the needs for the facility.
- The Councils recognise that this is a sensitive site but that it does have advantages – a sustainable location near where the waste will be generated; will be part of a newly developed area so can be designed into this new environment; is owned by the County Council; additional land is available for landscaping next to the site; it has easy access; and it is close to Trumpington Park and Ride so will help encourage linked trips and increase recycling.

18 The Councils do not wish to withdraw the site allocation from the SSPP. But if the Inspector does remove the site from the plan in order to ensure the soundness of the SSPP the Councils have confirmed that they would still wish to proceed to adopt the DPD.

19 If a review has to be carried out on the SSPP to find an alternative site Cambridgeshire County and Peterborough City Councils have asked that the Inspector's Report could assist the search by requesting that the current reviews of the Cambridge City Local Plan and the South Cambridgeshire Local Development Framework must consider removing land from the Green Belt for this specific waste management purpose.

South Cambridgeshire District Council's Response

20 South Cambs supports the views of Cambridgeshire County and Peterborough City Councils that the proposed allocation of land to the south of the Addenbrookes Access Road is a suitable site for an HRC. South Cambs supports the site allocation for the following reasons -

- This site has the advantage of being close to the urban community where much of the need arises and residents will not have to travel far to reach the facility. Recycling waste is an important part of our communities leading more sustainable lifestyles. The housing developments on the southern fringe and at other locations on the edge of Cambridge were made on former green belt land because they are they most sustainable locations for development. The site south of the Addenbrookes Access Road is the next most sustainable location for a household waste recycling facility.
- Since the proposed site will be part of a new development it can be designed to minimize the impact on its neighbours. The Environmental Health officers at South Cambs previously commented that noise and possible odours could be generated from an HRC and that there would need to be buffer zones to reduce the impact. In its evidence the County Council has demonstrated that with careful consideration of the layout of the site operations and incorporating specific mitigation measures the new development could be designed to minimize the

impact and to protect the health and well being of residents in the surrounding area.

- South Cambs can confirm that development on the southern fringe of Cambridge is progressing at a faster rate than any of the urban expansions on the edge of Cambridge. Reserved matters for the planning permissions for phase 1 of the development of this area have been approved. Further planning permissions for housing have been approved in August 2011. Although the first houses are not expected to be completed in South Cambridgeshire until 2014-15, within the City boundaries the first completions are expected as early as 2011-12. Planning permission for a primary school was given in July 2011. This is not an area of slow growth.
- If there were delays in providing an HRC because a partial review of the SSPP had to take place then this would not be good planning. An alternative site will not easily be found and is likely to have similar difficulties in delivery. The nearest sites at Milton and Thriplow are relatively distant from the southern fringe and any benefits in waste recycling will almost certainly be undone in congestion, CO₂ emissions and avoidable use of petrol. The Milton Household Waste Recycling facility is located in the Cambridge Green Belt.
- South Cambs agrees that any site put forward for a new HRC is likely to generate objections but this must be weighed against the need for a new facility in a sustainable location.
- The setting of Cambridge to which the Inspector attaches weight extends over the whole of the Green Belt whose extent was determined with the very purpose of protecting the setting of Cambridge. The Green Belt designation was itself subject to Inspector scrutiny at a Local Plan Inquiry and only includes land, which performs a green belt purpose. If land, which is currently in the Green Belt, is to be developed for a household waste recycling facility it is preferable that it is the most sustainable land for this purpose that is used. Cambridgeshire County and Peterborough City Councils' assessment has shown that the current proposed site is a very sustainable location for this development.

21 The Inspector had suggested that Hauxton be considered as an area of search but this village is some way from the edge of Cambridge and would result in increase travel for people wishing to use the facility. A number of sites have been considered in this area and all have been rejected.

22 The Cambridge Green Belt extends to the area surrounding the village of Hauxton and therefore any proposed site would have the same problems of being an inappropriate use in the Green Belt likely to harm the setting of Cambridge as the Inspector has concluded for the existing allocation.

23 If a site were to be considered near the village or the new development that will take place on the Bayer CropScience site then again it is likely that the Waste Consultation Area would include existing and new residents within it and consequently would not be acceptable to the Inspector if he is to be consistent in his views on reducing the impact of an HRC on adjoining residential areas.

24 South Cambs objected to one extensive site in Hauxton proposed in the Preferred Option 2 new sites consultation in 2009 because it was in a sensitive ecological area. It was located between two County Wildlife sites – River Cam and River Rhee. Otters are known to use both watercourses. Land to east of the River Cam is subject of a

river restoration scheme and adjacent land has been set up as a community riverside park. Amenity impact would be significant if a HRC was to be located here.

- 25 An area of search was considered in the Preferred Options 2006 on the Bayer CropScience site but was rejected by the County Council since the land was already allocated for housing in the South Cambs Local Development Framework. This site now has planning permission and remedial works are being carried out to remove contamination as a result of the previous industrial user. This site would not be suitable and is not available for use as an HRC.
- 26 The Councils in their response to the Inspector's note have suggested if he does remove the existing site allocation that he include in his report the request that during the reviews of the Cambridge City Local Plan and South Cambridgeshire District Council Local Development Framework that these councils must consider removing land from the Green Belt for this specific waste management purpose. Whilst recognising that this would remove the difficulties the Inspector had expressed about an HRC being located in the Cambridge Green Belt any land removed from the Green Belt within the South Cambridgeshire is likely to be within open countryside and therefore would have all the problems highlighted by the Inspector for the existing allocation. An HRC in the flat open countryside characteristic of the land to the south of Cambridge City would result in a highly visible facility, which would be out of place in this rural environment. If it is proposed that the Green Belt is removed for a site adjacent to a village this is highly likely to impact on the local community and result in many objections to the proposal.
- 27 South Cambs considers that the existing allocation should be retained in the SSPP. If the Inspector decides to remove it and this results in an early partial review of the SSPP it is not likely to be an easy task to find a suitable alternative site. With careful planning and design the site to the South of the Addenbrookes Access Road is the most sustainable and best option.

Implications

28	Financial	Nil
	Legal	Nil
	Staffing	If the site is removed from the Plan and an early review has to be carried out on the SSPP this will result in increased demands on staff time.
	Risk Management	Nil
	Equality and Diversity	Having an HRC located in an unsustainable location could make it more difficult for the less able to access the facility.
	Equality Impact Assessment completed	An EIA would have been carried out on the Pre-Submission Minerals and Waste Development Plan, which would have included this site.
	Climate Change	Providing an accessible HRC in the proposed site allocation will be a sustainable option. If alternatives had to be assessed it is likely that this would result in increased travelling for the people wishing to use the facility.

Consultations

- 29 At earlier stages in the preparation of the Minerals and Waste Development Plan both Environmental Health and Conservation officers were consulted for their views on the different sites proposed in the plan. This report has reaffirmed their views.

Consultation with Children and Young People

- 30 Not applicable.

Effect on Strategic Aims

- 31 AIM A – We are committed to being a listening Council, providing first class services accessible to all.

The Council is responding on behalf of the residents of the district to the consultation. If the Inspector rejects the allocated site it is highly likely that an alternative site could be within South Cambridgeshire. By supporting the County Council in reaffirming the current allocation South Cambs is looking to provide easy access to an HRC to the communities to the south of the City.

- 32 AIM B – We are committed to ensuring that South Cambridgeshire continues to be a safe and healthy place for you and your family.

By responding to the consultation the Council will ensure that the needs of the local residents to the south of Cambridge are considered. The current site allocation is the most sustainable one to serve the area to the south of Cambridge.

- 33 AIM C – We are committed to making South Cambridgeshire a place in which residents can feel proud to live.

By responding to the consultation the Council will ensure that the villages to the south of Cambridge have easy access to a new HRC and that its location does not impact on the surrounding countryside or result in increase travel by car along rural roads to access any new facility.

- 34 AIM D – We are committed to assisting provision of local jobs for you and your family.

The provision of a well-located new HRC will promote recycling within the district. Managing waste facilities could provide for local jobs.

- 35 AIM E – We are committed to providing a voice for rural life.

The Council in responding to the consultation will ensure that the Inspector considers the needs of the rural communities to the south of Cambridge.

Conclusions

- 36 South Cambridgeshire District Council supports Cambridgeshire County and Peterborough City Councils' view that the existing site allocation south of the Addenbrookes Access Road is the best location for a new HRC to serve the south of the City of Cambridge. If the Inspector removes this allocation from the SSPP there is not an obvious alternative site without similar difficulties highlighted by the Inspector for the current site allocation. Without an allocation in the SSPP there will be increase pressure placed on the ageing HRC facility at Milton to meet the increasing demands. This would undo much of the sustainability benefits of recycling by requiring unsustainable journeys to reach the recycling facility.

Appendices

A - Representation from South Cambs to the Pre-Submission Site Specific Proposals Plan DPD 2010.

B - Inspector's note on Site W1X – Household Recycling Centre, South of the Addenbrookes Access Road & Response by Cambridgeshire County and Peterborough City Councils to the Inspectors note

Background Papers: the following background papers were used in the preparation of this report:

- Cabinet Report – 14 December 2006 to consider the Preferred Option stage of the MWDP
- Cabinet Report – 9 September 2008 to consider the Preferred Option 2 stage of the MWDP.
- Planning and New Communities Joint Portfolio Holder Report - 10 March 2009 to consider the Preferred Options 2 new sites consultation on the MWDP

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Appendix A

Representation from South Cambs to the Pre-Submission Site Specific Proposals Plan DPD 2010.

Comments. Minerals and Waste LDF Site Specific Proposals DPD

Submission Plan (15/02/10 to 29/03/10)

Comment by	South Cambridgeshire District Council (Planning Policy)
Comment ID	MWSSPPS36
Response Date	23/03/10 11:29
Consultation Point	Table 36 (View)
Status	Submitted
Submission Type	Web
Version	0.2

Q1

Do you consider the document to be legally compliant? Yes

Q2

Do you consider the document to be sound? No

Q3

If you have identified that you think the document is unsound, please identify why. The Minerals and Waste Plan is unsound because it is not:

Tests of Soundness Justified

Q4

Please give details of your answer to Q3. Please be as precise as possible. Only information that relates to the representation will be accepted.

Your comment

SOUTH OF ADDENBROOKES ACCESS ROAD A number of sites were considered before the proposed allocation for land to the south of the Addenbrookes Access Road , Trumpington. This recycling centre must be convenient to serve the community in the south of Cambridge and the outlying villages if the sustainability benefits of recycling are not to be undone by unsustainable journey distances.

Environmental Health Comments: Proposed site and facilities will be to the South of the Glebe Farm development. Possible conflict. Noise and possibly odour may have an adverse impact. Appropriate buffer zones will be required in conjunction with careful design / layout of site operations and specific mitigation / abatement measures to minimise impact and to protect health and wellbeing of residents. As this is a new development it should be possible to ensure

minimal environmental impact at the design stage by incorporating intrinsic mitigation measures.

No objection subject to measures to mitigate the matters raised by Environmental Health. These are that appropriate buffer zones will be required in conjunction with careful design / layout of site operations and specific mitigation / abatement measures to minimise impact and to protect health and wellbeing of residents. As this is a new development it should be possible to ensure minimal environmental impact at the design stage by incorporating intrinsic mitigation measures.

The Council supports the identification of the site for a recycling centre and welcomes the additional information provided by the County as regards how the facility will be designed to reduce its impact on the surrounding area. South Cambs request that a site-specific policy be included in the MWSSP. This policy should include both the mitigation measures raised by Environmental Health and the design issues outlined by the County to reduce the impact of the facility on the surrounding area.

Q5

If you think the document is not legally compliant or is unsound please give details of what change(s) you consider are necessary, having regard to the test(s) you have identified in Q4 and the guidance notes. You will need to say why you think this change will make the Plan legally compliant or sound. It will be very helpful if you could also put forward your suggested revised wording of any policy or text. Please note your comment should briefly cover all the information, evidence and supporting information necessary to support or justify the representation and the suggested change, as after this stage, further submissions will be only possible at the request of the Inspector, based on the matters and issues he/she identifies for examination. Please be as precise as possible. Only information that relates to the representation will be accepted.

Changes

No objection subject to measures to mitigate the matters raised by Environmental Health. These are that appropriate buffer zones will be required in conjunction with careful design / layout of site operations and specific mitigation / abatement measures to minimise impact and to protect health and wellbeing of residents. As this is a new development it should be possible to ensure minimal environmental impact at the design stage by incorporating intrinsic mitigation measures. The Council supports the identification of the site for a recycling centre and welcomes the additional information provided by the County in paragraph 8.46 of the MWSSP as regards how the facility will be designed to reduce its impact on the surrounding area. South Cambs request that a site-specific policy be included in the MWSSP. This policy should include both the mitigation measures raised by Environmental Health and the design issues outlined by the County to reduce the impact of the facility on the surrounding area.

Q6

Please limit any summary to no more than 150 words. The Council reserves the right to amend summaries that are provided to ensure they reflect the information in the comment.

Summary

No objection subject to measures to mitigate the matters raised by Environmental Health. These are that appropriate buffer zones will be required in conjunction with careful design / layout of site operations and specific mitigation / abatement measures to minimise impact and to protect health and wellbeing of residents. As this is a new development it should be possible to ensure minimal environmental impact at the design stage by incorporating intrinsic mitigation measures. The Council supports the identification of the site for a recycling centre and welcomes the additional information provided by the County in paragraph 8.46 of the MWSSP as regards how the facility will be designed to reduce its impact on the surrounding area. South Cambs request that a site-specific policy be included in the MWSSP. This policy should include both the mitigation measures raised by Environmental Health and the design issues outlined by the County to reduce the impact of the facility on the surrounding area.

Q7

Do you want to appear at the Examination? No, I do not wish to appear in person

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**CAMBRIDGESHIRE AND PETERBOROUGH MINERALS & WASTE SITE
SPECIFIC PROPOSALS DPD**

INSPECTOR NOTE 2

Allocation W1X

Household Recycling Centre

South of Addenbrookes Access Road, Cambridge

During the course of the Hearings I indicated to the Councils my concerns with respect to the soundness of this allocation. I also said that, in the event that I were minded to recommend that the allocation should be removed from the Plan on grounds of unsoundness, I would inform the Councils and provide the opportunity for comment.

Having considered the written evidence, including the additional response from the Councils to my earlier expressions of concern, together with what I heard at the Hearings and what I saw on the site visit, I am now in a position to say that I am minded to find this allocation unsound; and that, as things stand, it is likely that I shall be recommending its removal from the Plan.

My reasons for reaching this conclusion are as follows:

1. The Addenbrookes Access Road forms a firm, hard boundary between the urban area of Cambridge and its rural surroundings to the South. Permission has been granted for residential development up to the northern side of the road (Glebe Farm) and this is likely to be built in advance of the provision of the proposed facility. The site allocation would take built development well beyond that boundary, which has been defined through the Local Plan process. The Inspector who held the Inquiry into the Cambridge Local Plan said (Para 9.18.10): "*The road and housing would form a new urban edge, with the opportunity to improve the character and appearance of this interface between the City and countryside. The proposed strip of housing would be an acceptable addition to the built-up area considered in the context of the new road and the large area of Green Belt remaining outside the line of the road*". The Local Plan (para 4.5) identifies compactness as one of the characteristics of the city. There is no doubt in my mind about the purpose of identifying the boundary and of its importance to the objectives of the Local Plan. The proposed allocation would compromise those objectives.
2. It is inherently undesirable - to say the least - that an allocation in one Plan should be inconsistent with a principle or objective of another. Paragraph 4.45 of PPS12 says in the context of deliverability that plans should ensure that "*... what is in the plan is consistent with other relevant plans and strategies relating to adjoining areas ...*" and "*should be coherent with the core strategies prepared by neighbouring authorities where cross-boundary issues are relevant*". Though this is stated by reference to core strategies, its thrust logically applies equally to site allocations.

3. The site is in the Green Belt and there is no dispute that the proposed use would amount to inappropriate development in the Green Belt sense. 2 of the 5 purposes of including land in the Green Belt listed in paragraph 1.5 of PPG2 are: *to check the unrestricted sprawl of large built-up areas* and *to assist in safeguarding the countryside from encroachment*. The land in question clearly fulfils both purposes. Its development as proposed would be contrary to them.
4. A further purpose listed is to preserve the setting and special character of historic towns. Cambridge is an historic city which has a special character, but its historic centre is not visible when approaching from the south in the vicinity of the site. Rather, the appearance of the urban fringe here is one of modern development, including well-lit major roadways and substantial and extensive development. However, insofar as Cambridge has historically kept a clear distinction between the city and the flat rural area which provides its setting, and maintained this by the firm boundary defined in the Local Plan and on the ground, the proposed facility would also be contrary to that purpose. In this connection, I would regard the setting of the city as being a heritage asset by reference to the definition in PPS5, which includes: *a place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions*. It appears that this consideration was not fully taken into account when assessing the merits of alternative sites.
5. Paragraph 1.6 of PPG2 defines 6 objectives for the use of land in the Green Belt. The proposed facility would not contribute to the achievement of any; and would directly militate against 2: *to retain attractive landscapes, and enhance landscapes, near to where people live; and to retain land in agricultural, forestry and related uses*.
6. Paragraph 1.4 of PPG2 say that *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness."* Whether openness is defined by reference to absence of development or exposure to view, it would be significantly reduced by the facility proposed. Planting in time might limit views of the building and activities but could in itself be a discordant feature in the flat open landscape.
7. In relation to all of the Green Belt matters, though location was taken into account in the site assessments, it is uncertain whether the degree of harm to the Green Belt, its purposes and objectives was assessed.
8. A considerable proportion of the Waste Consultation Area for the site allocation includes land which is to be developed for housing. Paragraph 10.23 of the Core Strategy says that *"New neighbouring development can impact on waste management sites and make it*

problematical for them to continue to deliver their important function". Paragraph 10.26 adds that " ... other forms of occupied development may be incompatible with waste management development and prejudice existing or future operations". In short, this recognises the potential incompatibility of waste management uses with residential development. In my view, the proximity of the proposed facility to the future Glebe Farm housing – some of which will have a frontage to Addenbrooke's Access Road directly opposite the facility and its access – is incompatible with the purpose of identifying Waste Consultation Areas and hence with the proposed allocation. This is both from the point of view of protecting residential occupiers from the environmental effects of the facility and in order to prevent future prejudice to the operation of the facility.

9. In terms of deliverability, although the land is available it is highly likely that there will be significant objections to a planning application for the facility: from the City Council, English Heritage and from local residents. With respect to the latter, I would expect the level of opposition to be greater than that to the proposed allocation, since by that time the Glebe Farm development would be occupied. Though I cannot predict the outcome of any application, there is insufficient certainty that it would be forthcoming.
10. Having regard to these matters, I take the view that the proposed allocation is potentially unsound by reference to:
 - lack of consistency with national policy with respect to the Green Belt and PPS5;
 - lack of conformity with the objectives of the Cambridge Local Plan;
 - lack of consistency with the purposes of identifying waste Consultation Areas in the Core Strategy;
 - doubts over the robustness of the assessment of the site with respect to the effect on the setting of the city; and
 - doubts over the deliverability of the facility, and thereby the effectiveness of the allocation.

In reaching these conclusions, I acknowledge the very considerable work that has gone into identifying the site and that all available sites considered were in the Green Belt. I appreciate the need for a new facility, not least to serve the needs of the future occupiers of new housing locally. I am of course aware that in terms of sustainability, the site would be well-placed to serve its intended catchment. I also note the Councils' commitment to high quality design through their Supplementary Planning Document. Judgments with respect to the Green Belt and heritage assets are explicitly on balance; and so is the overall question of soundness.

But the Councils have conceded that the case for this allocation is finely balanced. Moreover, there is no pressing need to make replacement provision in the early years of the Plan. Indeed, it appears that owing, amongst other things, to the slow-down in development locally and the funding of the facility being at least in part by way of developer contributions, provision would be made later than initially planned. Though the present household recycling provision for South Cambridge is less than ideal, it is acknowledged to be presently adequate. The argument in favour of the site in terms of need is thereby reduced. In any event, need is something that would apply equally to any site. It does not particularly support the proposed allocation.

I now turn to the way forward. As things stand, I am minded to recommend that the allocation be removed from the Plan. I am prepared to accept further representations from the Councils in response to this note and to hold an additional Hearing if the Councils consider that they may be able to present more convincing evidence. I would involve representors in that process, should they wish to contribute. However, in fairness to the Council, having aired the subject extensively during the Hearings and having already received a response to my earlier expressions of concern, I have my doubts about whether this would be particularly productive.

An alternative would be for the Councils to seek to withdraw the allocation voluntarily by way of a Change. Please let me know your views on this.

As you know, I heard representations at the Hearings concerning an alternative site, or at least an area of search, at Hauxton; and I viewed it on my site visits. At present I am not minded to allocate it as a substitute for W1X since it too suffers from a number of drawbacks and I have insufficient information to determine whether, in the terms of PPS12, it would represent the most appropriate strategy when considered against the reasonable alternatives. In reaching this conclusion, I have also had regard to the lack of pressing need for, or ability to provide the facility in the short to medium term. Rather, a more measured approach would be for the Councils to promote a site within the context of a partial review of the SSPDPD in due course.

Please could the Councils respond to this note by the end of next week (22nd July). The detailed arrangements for taking the matter forward may then be made.

Jonathan G King
Inspector

14th July 2011



**CAMBRIDGESHIRE AND PETERBOROUGH MINERALS AND WASTE
SITE SPECIFIC PROPOSALS PLAN**

**STATEMENT BY CAMBRIDGESHIRE COUNTY COUNCIL AND PETERBOROUGH
CITY COUNCIL IN RESPECT OF INSPECTOR NOTE 2**

**ALLOCATION W1X: HOUSEHOLD RECYCLING CENTRE SOUTH OF
ADDENBROOKES ACCESS ROAD, CAMBRIDGE**

July 2011

Cambridgeshire County Council and Peterborough City Council – Officers response to Cambridgeshire & Peterborough Minerals and Waste Site Specific Proposals (SSP) Plan, Inspector Note No. 2

Extract: I am minded to recommend that the allocation [W1X] be removed from the Plan. I am prepared to accept further representations from the Councils in response to this note and to hold an additional Hearing if the Councils consider that they may be able to present more convincing evidence. I would involve representors in that process, should they wish to contribute. However, in fairness to the Council, having aired the subject extensively during the Hearings and having already received a response to my earlier expressions of concern, I have my doubts about whether this would be particularly productive.

An alternative would be for the Councils to seek to withdraw the allocation voluntarily by way of a Change. Please let me know your views on this.

The Councils thank the Inspector for the opportunity to comment on this issue in advance of the publication of his report. The Councils' comments are set out below.

1.0 The need for a Household Recycling Centre (HRC) and consistency with the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy and other waste management plans and strategies

1.1 The Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Policy CS16), adopted by the Councils on 19 July 2011, seeks to secure a network of HRCs and identifies the following broad locations for new HRCs in the Cambridge Area:

- Cambridge East
- Cambridge North
- Cambridge South

The HRC broad locations identified in Policy CS16 (including those in Cambridge) represent the principal growth areas (and consequently areas that will experience an increase in demand for local services), and reflect the waste strategy of the authority to further increase local waste recycling and relate the need to provide easily accessible and convenient facilities which provide an ideal drive time to an HRC of a maximum 15 minutes.

1.2 In considering the soundness of the Core Strategy, and specifically the strategy for the provision of HRCs, the Inspector's Report stated:

'it is right that the CS [Core Strategy] should identify the need in the interests of sustainability and the active involvement of the public in waste management. A single centre to serve the whole of Cambridge would not be appropriate: it would be too remote from a proportion of the population, inhibiting use and requiring longer journeys'

(Evidence Reference: E136, Paragraph 82)

- 1.3 At the Site Specific Proposals Examination it was confirmed that the timing of the development of the urban extension at Cambridge East was uncertain given the difficulty in finding a suitable site for the relocation of Cambridge Airport. The allocation for a new HRC at Cambridge East is dependant upon this taking place, and if it proceeds it is likely to be a development for the longer term.
- 1.4 If an allocation is not made for an HRC to serve Cambridge South the existing and new residents of Cambridge South would have the option of using the single HRC within the Cambridge area i.e. Butt Lane, Milton (or in the longer term its replacement in the Cambridge Northern Fringe East); or driving some distance to the HRC at Thriplow (approximately 10 miles / 20 minutes). Both are contrary to the intent of the Core Strategy, and specifically Policy CS16.
- 1.5 Reference to consistency with relevant plans and strategies (Paragraph 4.45 of PPS12) is referred to in Inspectors Note 2 (Evidence Reference: R27). It has not been disputed that all realistic potential locations for an HRC to serve Cambridge south lie in the Cambridge Green Belt. Any facility in this location would therefore be inconsistent with local planning policy and objectives, either those of the Cambridge Local Plan or the South Cambridgeshire Local Development Framework; both local planning authorities have objected to the potential sites for an HRC which lie within their authority area. However, not to include an allocation for a HRC to serve Cambridge South in the Site Specific Proposals Plan would be inconsistent with the adopted Minerals and Waste Core Strategy, the Cambridgeshire and Peterborough Joint Municipal Waste Strategy and the Councils adopted Household Waste Recycling Centre Strategy (Evidence References: E135; E077; E056).

2.0 Consistency with national policy

Green Belt and the Historic Environment

- 2.1 The points raised in Inspectors Note 2 regarding the lack of consistency with national planning policy relate to the Green Belt and the historic environment.
- 2.2 The Councils dispute the suggestion that the assessment of sites was not robust in respect to the historic environment and Green Belt objectives, including the potential effect of waste management development on the setting of Cambridge City. This was taken into account in the work undertaken by LDA Design which assessed each site to determine its landscape capacity to accommodate waste management development as well as potential visual impact. Their methodology clearly states:

'Cambridge Green Belt Study

Some sites lie within the setting of the historic city of Cambridge. In 2002 LDA Design (formerly Landscape Design Associates) carried out a study of Cambridge and its Green Belt for South Cambridgeshire District Council (Landscape Design Associates 2002). The report was a core document at the Structure Plan Examination in Public (EiP) which took place at the end of 2002. The study started with an assessment of Cambridge in order to identify the setting and special character of the city and the qualities to be safeguarded, before setting out a vision of the city. In determining the extent to which sites that lie within the setting of Cambridge could accommodate the proposed mineral/waste development, without

significant detriment to their character or that of their larger character areas, taking into account current practice of mitigation and reinstatement, it is important to consider the potential effects on the setting and special character of the city to ensure that the qualities to be safeguarded are not harmed. This study therefore makes reference to LDA Design's Cambridge Green Belt report as part of the assessment of the suitability of the proposed uses within the sites.'

(Evidence Reference: E028, Paragraph 2.1)

- 2.3 All site assessments include a summary of the conclusions of the LDA landscape assessment. The summary of 'Landscape Capacity and visual impact with mitigation' in the site assessment of W1X therefore takes historic issues into account and states:

'The site consists of arable farmland and grassland, and lies within an open farmland setting to the south of Trumpington. Although the development would be a new feature in the open arable landscape and change the approach into Cambridge it would provide an opportunity to enhance the urban edge by positive architecture and landscape design. Screen planting might be appropriate and could create a soft green edge to Cambridge. To maintain the compact form of the city and rural foreground to views from the M11/ A1309 junction development should be located to the north east of the site and countryside retained to the south west'

(Evidence Reference: E093, Site W1X)

- 2.4 The Councils have acknowledged that the location of W1X is a sensitive one, but consider that it is possible to provide this essential infrastructure whilst still respecting the principles of Green Belt and the historic environment, as advised by LDA design. Considerable work has been undertaken to demonstrate how an HRC might be integrated in this location (Evidence Reference: E094). The Councils have already confirmed that additional land to the east of site W1X would also be available for landscaping / mitigation (Evidence Reference: SSPGen2, Change No. S70/1)

- 2.5 The Council as Highway Authority also owns land within the highway boundary of the A1309 north of the M11 junction where further planting could be undertaken. This could complement existing new landscaping areas associated with the Addenbrookes Access Road. Taken together with existing new landscaping undertaken along the western boundary of site W1X the Councils believe that adequate mitigation to minimise its visual impact in the local area can be achieved.

PPS1 Delivering Sustainable Development and PPS10 Planning for Sustainable Waste Management

- 2.6 The Councils consider that consistency with national planning policy is a broader issue than reflected in Inspectors Note 2, and should also take into account national planning guidance in respect to delivering sustainable development and sustainable waste management.
- 2.7 Over 4,000 home are planned for the Cambridge Southern Fringe; it is a very major extension to the City. PPS1 Delivering Sustainable Development advises planning authorities that when bringing forward locations to meet the expected needs of housing and other types of development they should be,

'taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management...'

(Evidence Reference: R21, Paragraph 27(iv)).

- 2.8 The principles of sustainable waste management are enshrined in the European Waste Framework Directive. Article 16 stresses the need for a network of facilities, the need for self sufficiency, and the importance of proximity in the provision of waste management facilities.

- 2.9 PPS10 states that planning strategies should:

'protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission'

(Evidence Reference: R26, Paragraph 3, bullet 6)

Although this is stated by reference to determining planning applications its thrust logically applies equally to making provision through development plan allocations.

- 2.10 In January 2006 the Cambridge Southern Fringe Area Development Framework was approved by Cambridge City Council. It identified a need for a Household Waste Recycling Centre in the Southern Fringe (Evidence Reference: E102, Section 4.3, page 42). However, the consequential detailed planning of the area did not leave any potential sites for an HRC within the development area of the southern fringe. All realistic potential sites for an HRC therefore lie outside the development area and within the Cambridge Green Belt.
- 2.11 Contrary to the national situation the development of the Cambridge southern fringe has not slowed down. Recent reserved matter planning decisions made by the Joint Development Control Committee include:
- Glebe Farm – 286 dwellings, granted August 2010
 - Bell School site – 347 dwellings, outline planning permission December 2010
 - Trumpington Meadows – 353 dwellings, granted 13 July 2011
 - Clay Farm – 306 dwellings, granted 13 July 2011
 - Trumpington Meadows Primary School – granted full planning permission 13 July 2011

Construction at Glebe Farm has already commenced, and the first dwellings in the Clay Farm area are expected to be completed in early 2012.

- 2.12 Whilst the residents in Cambridge South can rely on existing HRC provision in the short term, in the medium / longer term as the new housing comes on stream, the need for an HRC will become pressing. It should also be borne in mind that

considerable development is also taking place in other parts of the City and its immediate hinterland (such as redevelopment for housing of the Bayer East, Hauxton site), which will also place increased demands upon the existing local HRC infrastructure.

3.0 Compatibility of waste management development with residential development

- 3.1 Inspector Note 2 raises, by reference to Waste Consultation Areas, the issue of compatibility of waste management development with residential development. On 19 July the Councils adopted their Supplementary Planning Document, The Location and Design of Waste Management Facilities (Evidence Reference: E157). This provides advice on the provision of waste management facilities on urban edge / new development site locations. It illustrates that through high quality design and appropriate use of buffers and mitigation measures (which can take a number of potential forms) waste management development can be proximate to residential development, the source of the waste arising. The principles of this Guide were taken into account in the concepts put forward for site W1X (Evidence Reference: E094).
- 3.2 Waste Consultation Areas normally extend 250 metres from a waste management site. It is possible that after a site has been developed its Waste Consultation Area could be reviewed with a view to reducing it, having taken into account the detailed design of the facility and the mitigation measures which have been put in place.
- 3.3 A case in point is the new Witchford HRC. This new development has an access point which is 50m from a residential property, which is also approximately 100m from the facility building itself. The facility is also adjacent noise sensitive uses on the neighbouring industrial estate. However, with mitigation the HRC has been successfully accommodated.
- 3.4 Site W1X faces the proposed development at Glebe Farm. However, it should be noted that the developer, Countryside Properties, did not make any representations at the Proposed Submission stage against the proposals in the Plan in this respect.

4.0 The timing of HRC provision

- 4.1 The Councils have indicated that in the short term existing and new residents of Cambridge South can be served by the existing provision in the area, albeit that this is far from ideal (see Section 1). However, that is not to say that advance planning for a new HRC should be postponed.
- 4.2 Inspectors Note 2 suggests that the Councils could promote a site for an HRC for Cambridge South through a future partial review of the Site Specific Proposals Plan. This approach is not favoured by the Councils. Experience to date has shown that the preparation of a Development Plan Document (DPD) is time and resource hungry. There are several statutory stages to a DPD review, and this is unlikely to be a quick process particularly given that this issue has proven to be both complex and locally contentious. Moreover the Councils have already undertaken an exhaustive search for potential sites over a 5 year period (including a study of brownfield and industrial land, Evidence Reference: E038), and there is no evidence to suggest that new sites would be identified through a review process, or

that the issues would be any different from those today. In addition recent experience with the development of a new HRC at Witchford, Ely has shown that the period from the commencement of design work to commissioning of an HRC can take around three and a half years. These factors combine to suggest that if this matter was postponed an HRC would not be delivered until very much later in the Plan period. Planning for a new HRC needs to take place now so it can be delivered in the medium term.

5.0 Deliverability of an HRC

- 5.1 Inspector Note 2 suggests that site W1X may not be deliverable given the objections by Cambridge City Council (Green Belt matters) and English Heritage (the historic environment). These points have already been considered in this response.
- 5.2 The Note goes on to state that the Inspector anticipates an increased level of objection from occupiers of the new housing developments. It is of course not the volume of objections but the validity of their land use planning concerns which needs to be taken into account. It is the Councils experience, demonstrated through the volume of representations recorded on the site assessments of W1X and other potential sites considered for an HRC (E093, e.g. Site SS4-125 Hauxton), that any proposal for this type of development will receive substantial local comment.
- 5.3 In a similar case at the new Witchford HRC significant local comment was also received but when balanced against the pressing need for the facility and improved accessibility the Planning Committee resolved to grant planning permission.
- 5.4 The path of any planning application would be assisted by an allocation in a Development Plan Document. For reasons outlined in this response the Council consider that W1X should be allocated.
- 5.5 Developers in the Cambridge Southern Fringe are contributing financially through Section 106 contributions towards the provision of new local HRC facilities.

6.0 Allocation of W1X

- 6.1 As outlined above the Councils have undertaken an extensive search for sites which could accommodate an HRC to serve Cambridge South. There has been a robust scrutiny of those potential sites through the Councils 3 stage site assessment methodology (Evidence Reference: E093). This process has resulted in site W1X being identified as the most appropriate site for this use, this process was summarised in the Councils response to Matter 5 (Evidence Reference: SSP/5/CP/2).
- 6.2 The Councils consider that W1X has several advantages over the other sites that were considered including:
- it is in a sustainable location and the one which is the most proximate to the main source of waste arising

- a location adjacent to new development provides an opportunity to facilitate the integration of the facility into the urban fringe, which in the Councils view can be more readily and successfully achieved than integration of an isolated development into the open countryside / Green Belt
- there are opportunities to integrate the high quality design of the new HRC with the new development taking place north of the Addenbrookes Access Road
- the site is owned by the County Council which will aid delivery
- there is scope to use additional land to the east of the site and land under the control of the Council as Highway Authority for further landscaping, which will assist integration of the site into the local area
- the location of the development proximate to housing giving easy access to the facility
- the location of the development close to Trumpington Park and Ride and employment (e.g. Addenbrookes complex) will help encourage linked trips and increased recycling

6.3 The Councils recognise that there are sensitivities associated with site W1X, specifically its green belt location and issues relating to the historic environment of Cambridge. However, these concerns have to be balanced against the other matters which have been outlined in this response. On balance the Councils maintain their view that site W1X is an appropriate location for an HRC to serve Cambridge south and should be allocated in the Site Specific Proposals plan.

7.0 **Conclusion**

7.1 Having had regard to Inspectors Note 2 and the response above the Councils conclude:

- the site assessment process has been robust, and has included appropriate consideration of the Cambridge Green Belt and its purposes, including the historic environment and the setting of Cambridge City
- there has been an exhaustive search for a suitable site; no others have been suggested that have not been considered through the Plan process. The Council has therefore considered all 'reasonable alternatives' as required by PPS12
- W1X has been identified as the most appropriate site having considered all reasonable alternatives and all relevant factors including Green Belt and the historic environment, and considerable work has been undertaken which demonstrates how an HRC can be successfully integrated into this location
- failure to make an allocation for an HRC to serve Cambridge South would be contrary to the Councils adopted Minerals and Waste Core Strategy, as well as other adopted waste management plans and strategies, which is contrary to PPS12

- the allocation of W1X needs to be considered in the context of other national planning policy; the key principle of delivering sustainable development and the essential provision of sustainable waste management infrastructure. Having had regard to all national planning policy the Councils consider that the balance must lie in favour of meeting this fundamental guidance and that W1X should be allocated
 - development in the Cambridge Southern Fringe has commenced and has not slowed down, as the population in this area and in the wider City area increases the reliance of Cambridge south on existing HRC provision can only be in the short term
 - in order to deliver alternative HRC provision in the medium term planning decisions need to be taken now, it would not be appropriate to defer provision to a future review of the DPD
 - any planning application for an HRC to serve Cambridge South will face green belt policy issues and will attract considerable local comment, but this will need to be balanced against the need for the facility being an essential element in securing sustainable development in the local area.
- 7.2 The Inspector has invited the Councils to consider withdrawing allocation W1X. The Councils do not wish to follow this course of action. They maintain that having had regard to all factors W1X should be allocated in the Site Specific Proposals Plan.
- 7.3 In the event that the Inspector is still minded to remove site W1X from the Site Specific Proposals Plan the Councils request that he have regard to advice in the Companion Guide to PPS10 which states:

'In their search for sites, and in line with the Key Planning Objectives in PPS10, WPA are expected to protect Green Belts but recognise the particular locational needs of some types of waste management facilities when defining detailed Green Belt boundaries. In certain circumstances, in particular where a local authority's area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt.'

Such a proposal should be brought forward through the LDD process. This will provide greater certainty for the WPA in providing sufficient land capacity to meet identified need for waste management facilities and to the waste industry for the purpose of submitting a planning application. Where land is removed from the Green Belt in this way, it should be specifically allocated in a DPD as a waste management facility site only. This process will need to be carefully coordinated between the District planning authority and the WPA in two tier authority areas, given that the Green Belt boundary will be defined in the district DPD.'

(Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10, Evidence Reference: CSRepD1, Paragraphs 7.34 and 7.35)

It is respectfully suggested that the Inspector's Report could assist any future search for a suitable site by requesting that the current reviews of the Cambridge

Local Plan and South Cambridgeshire Local Development Framework must consider removing land from the Green Belt for this specific waste management purpose. This land could then be taken forward for allocation through a closely targeted partial review of the Site Specific Proposals Plan.

- 7.4 Should the Inspector remove W1X from the Plan in order to ensure soundness of the Site Specific Proposals Plan, the Councils confirm that they would still wish to proceed to adopt the DPD.
- 7.5 Finally, the Councils thank the Inspector for the offer of a further Hearing Session on this matter. The Councils share the Inspectors doubts that this would be productive, and are content for him to take his decision having had regard to this additional response and the detailed evidence already submitted on this matter and findings from the site visit.

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Northstowe and New Communities Portfolio Holder 20 September 2011
AUTHOR/S: Executive Director (Operational Services) / Corporate Manager (Planning and New Communities)

MINERALS AND WASTE SITE SPECIFIC PROPOSALS PLAN - RESPONSE TO CONSULTATION BY CAMBRIDGESHIRE COUNTY AND PETERBOROUGH CITY COUNCILS ON SUGGESTED CHANGES TO THE PLAN

Purpose

1. The purpose of the report is to respond to the consultation being carried out jointly by Cambridgeshire County and Peterborough City Councils on suggested changes to the Minerals and Waste Site Specific Proposals Plan.
2. The consultation is for six weeks from 8 August to 19 September 2011.
3. The full consultation can be seen on the County's website.
<http://www.cambridgeshire.gov.uk/environment/planning/mineralswasteframework/mineralswasteplan/dpdxamination/sitespecific/>
4. This is a key decision because it is likely to affect many of the communities across the district. Some of the changes included in the consultation are significant and others minor so there will be different degrees of impact. Some relate to the allocated mineral sites, which may have an impact on their local communities such as at Cottenham and Barrington. Also there will be a significant impact on communities living or working in the wards in the District adjacent to the A14 because clay borrowpits are identified in the minerals plan – Fen Drayton; Swavesey; Longstanton; Bar Hill; Oakington; Girton; Lolworth; Boxworth; Dry Drayton; Conington. Some changes relate to the proposed waste sites to serve the whole of the district and so their locations will have a district wide impact.
5. It has not appeared in the Forward Plan because it is an unexpected additional consultation.

Recommendations

6. That the Northstowe and New Communities Portfolio Holder agree to the following recommendations:
 - 1) To support the changes relating to the updating of the information on the A14 improvements
 - 2) To question why the site allocations for borrowpits are 'areas of search' rather than remaining as site allocations
 - 3) To support the inclusion of borrowpits within the SSPP to provide for any future improvements to the A14 but that a hierarchy of these site should be included in the final SSPP to reflect which should be utilised first in the event that they are not all needed.
 - 4) To require that any future use of the identified borrowpits should be restricted to use on A14 improvements.

- 5) To support the changes proposed for the Cottenham Site Profile.
- 6) To agree the responses to the minor changes as set out in Appendix B.

Executive Summary

7. During the hearings into the Site Specific Proposals Plan DPD Cambridgeshire County and Peterborough City Councils have proposed a number of changes to their plan. Since these changes could affect the soundness of the plan there is now a further period of public consultation. Significant changes are listed in Appendix A and minor changes in Appendix B.
The main significant change that relates to minerals sites within South Cambridgeshire are the borrowpits allocations to serve the A14 improvements. The Plan has been updated to reflect the Government's decision abandon the original scheme and to look for alternative proposals for the A14. The borrowpits are now areas of search rather than allocations, which could blight all the sites for an uncertain period of time. It is proposed that the borrowpits could be used for schemes other than the A14. South Cambs had objected to some of the allocations and would not wish these sites to be used for other schemes. South Cambs had suggested a hierarchy of borrowpits be introduced with those with the least environmental impact being used first in any A14 upgrade.
The other significant change relates to Cottenham to correct a factual error and to allow for inert infill to be allowed for future restoration works of the site.

Background

8. Cambridgeshire County and Peterborough City Councils have jointly prepared a Minerals and Waste Development Plan (MWDP). The Councils adopted the first part of this Plan, the Core Strategy, on 19 July 2011.
9. An Independent Planning Inspector is currently examining the second part of this Plan, the Site Specific Proposals Plan DPD (SSPP). South Cambridgeshire District Council submitted representations on the SSPP during the Pre- Submission consultation and these were considered by the Inspector during the examination. The Public Hearing sessions on the SSPP were completed on the 8 July 2011. During the course of the Hearings the Councils proposed a number of suggested changes. Some of these changes are significant and go to ensuring the soundness of the Plan; the majority of the changes are minor and go to securing consistency and factual accuracy in the Plan.
10. The Suggested Changes to the Site Specific Proposals Plan are being published for a six-week period of public consultation from 8 August to 19 September 2011.

Changes and how they impact South Cambridgeshire District

11. There are both significant and minor changes included in the current consultation that relate to mineral and waste sites within South Cambridgeshire. The significant changes are listed in Appendix A of this report and the minor ones in Appendix B.

Significant changes – Borrowpits

12. The majority of the significant changes relate to the borrowpits allocated in the SSPP to serve the works that were expected to take place to upgrade the A14. An extract from the report that considered the borrowpits in the Pre-Submission consultation is included as Appendix C.

13. The amended wording that has been added to the relevant section in the current consultation on the SSPP is as follows -

The Mineral Planning Authorities are aware of the **long standing plans for the proposed improvements of** to the A14 trunk road between, Ellington to the west of Huntingdon and Fen Ditton to the northeast of Cambridge, ~~that will require exceptionally large quantities of sand and gravel.~~ **However, the Government has confirmed that it can not fund this scheme principally because in its current form, it is unaffordable.** ~~Approximately 2 million tonnes of sand and gravel will be required.~~ **However, Government has recognised the economic importance of this route and that congestion is a serious problem and therefore remain committed to developing a solution. Work has now begun on the Strategic Corridor Study with the aim of identifying a viable way forward, including exploring alternative methods for managing traffic volumes, considering potential delivery mechanisms, and potential future improvements. A package of alternative proposals for improving the A14 are anticipated to be forthcoming during the lifetime of this Plan. Consequently Areas of Search for A14 borrowpits are proposed as it is still anticipated that mineral resources for some form of scheme will be needed within the lifetime of the Plan (up to 2026). The future release of mineral will be commensurate with the need for mineral for improvements to the A14 only.** ~~Borrowpit allocations have, therefore, been identified for this project only. Any proposals to extend the life of these borrowpits to serve the open market will be resisted~~ **will be considered in the context of Core Strategy Policy CS13 Additional Mineral Extraction**

14. It is recognised that since the SSPP was first published the upgrading of the A14 has been cancelled by the Government but that it is still anticipated that improvements will be made in the future on the A14 and that it would be hoped that these would occur before 2026. Therefore it is agreed that updated information is required in the SSPP to reflect these changes. However there are still some concerns relating to the borrowpits within this district particularly as these are no longer to be site allocations but will be 'Areas of Search'.
15. Uncertainty of timing - The representations made by South Cambs during the Pre-Submission consultation relating to borrowpits stated that the MWDP was not the appropriate vehicle to allocate borrowpits for the A14 improvements especially as the Highway Agency was still uncertain as to how many would be needed. At that time it was thought that works on the A14 would have begun before the MWDP was adopted and that having the borrowpit allocations in the plan could have delayed the start of the road scheme. At the present time there are no firm proposals for improvements to the A14 and the uncertainty is now increased.
16. Borrowpits use for alternative schemes? - It is of concern that the former wording restricting the borrowpits to only being used for A14 improvements has now been removed and replaced with a requirement that any future use be considered against Core Strategy Policy CS13 - Additional Mineral Extraction. This states that additional mineral extraction would only be permitted where there were overriding benefits, which could justify an exception. It is considered that the borrowpits are only suitable for A14 usage and not for other projects as their location is adjacent to the route of the A14 to serve this project. If they were to be utilised for another scheme this would result in the mineral having to be transported to this new location, which would be unacceptable. These borrowpits are conveniently located to be used for a future upgrade of the A14 and should therefore only be used for this project. Some have

been identified by South Cambs in previous representations to be environmentally unacceptable even if they were to be used for the A14 project – a project that the Council fully supports. It is therefore highly unlikely that an exceptional circumstance could be found to allow for their usage other than for the A14. Therefore the restriction to only being used for the A14 should remain in the SSPP.

17. Allocations V Areas of Search? - A significant change in the current consultation is that all the borrowpits will be considered as 'Areas of Search' (their boundaries will remain the same) because with the original scheme being cancelled, there is uncertainty about the quantity of mineral that will be required. - As the Department for Transport is exploring a lower cost upgrade for the A14, Cambridgeshire County and Peterborough City Councils as Mineral Planning Authority have felt that it is prudent to make some provision for borrowpits. It is considered appropriate to support provision being made in the SSPP but it is of concern that site allocations are not being made. 'Areas of search' could blight land unnecessarily and could result in proposals, which are not supported, and this could unnecessarily delay construction work. Even in the earlier version of the SSPP when the quantities of mineral required were uncertain site allocations were still made.
18. Hierarchy of borrowpits? - South Cambs had concerns over a number of the actual sites identified for borrowpits in the submission plan and had suggested in its representations that a hierarchy of suitability be introduced into the SSPP with some borrowpits being identified as being more suitable than others and therefore being utilised first before others which the Council considered to have greater impact if they were to be worked. Given the uncertainty over quantities of minerals that may be required in future it should be reaffirmed that this hierarchy should be included in the SSPP to recognise which sites would be used first in the event of the road scheme requiring minerals.

Table showing borrowpit hierarchy

Borrowpit (no in brackets refers to site ref. In Submission version of SSPP)	Place in hierarchy	Comments made on this site in Preferred Option 2 consultation 2009
New Barns Farm, Conington (16)	3	Supported with reservations concerning proximity to Conington; impact on wintering site for golden plovers.
Brickyard Farm, Boxworth (15)	1	Supported by South Cambs
Boxworth End Farm, North of Trinity Foot Junction (14)	1	Supported by South Cambs
South Trinity Foot Junction- East (21)	2	Supported with reservations concerning proximity to Lolworth
South Trinity Foot Junction - West (22)	1	Supported by South Cambs
North Bar Hill, Noon Folly Farm (17)	1	Supported by South Cambs
North Dry Drayton Junction, Slate Hall Farm (18)	4	Rejected by South Cambs
North Junction 14, Grange Farm (19)	3	Supported with reservations concerning impact on Beck Brook and site is in Green Belt

Borrowpit (no in brackets refers to site ref. In Submission version of SSPP)	Place in hierarchy	Comments made on this site in Preferred Option 2 consultation 2009
South Junction 14 /Girton/ Madingley (20)	2	Supported with reservations concerning site in Green Belt but potential for restoration of site for wetland reserve.

Significant change - Cottenham amendment

19. An additional significant change being proposed is that of correcting a factual error that occurred in the SSPP relating to the sand and gravel site allocation at Cottenham. The amended maps are included as Appendix D. The original map did not reflect the fact that existing planning permissions allow for minerals and waste activity in the area shown. This has now been corrected.
20. Also an additional area of search has been added to the northwest of the Cottenham area to reflect restoration proposals for this part of the site, which will require a limited amount of inert fill. This has resulted in a wider waste consultation area being included around this waste proposal. This is linked to minor changes - SSP M31 and SSP M156 where the following wording is to be added to the Cottenham site profile –

Description of Proposed Use:

North: Area of Search for inert landfill associated with the restoration of this area to a biodiversity afteruse complementary to the Great Ouse Wetland

South: Site-specific allocation for inert landfill with restoration back to agriculture

Estimated Volume

North: the volume of inert fill will be commensurate with that needed to secure restoration objectives

South: 680,000 – 720,000 m³

Implementation issues

Restoration of the northern area will be complementary to the biodiversity objectives of the Great Ouse Wetland, including enhanced public access. This may involve the use of a limited amount of inert fill. The southern part of the site will be restored to an agricultural afteruse at original levels through the deposit of inert fill

21. The consideration of the afteruse of this land to the north of the site is to be welcomed and that the restoration will be one where the biodiversity will be improved. Enhanced public access is also to be welcomed. The Environment Agency must be involved at an early stage in this work in order to assist in reducing the flood risk of the land adjacent to the River Ouse whilst encouraging a habitat that enhances biodiversity.

Minor Changes

22. Appendix B considers all the minor changes as they relate to sites within the District. Many of the changes relate to maintaining consistency between the site profiles, which is to be welcomed. Concerns raised in original representations should be re-stated that the each site does not have a site-specific policy and this should have formed part of this consultation. Having the implementation issues included in a policy rather than being within the supporting text would give them increased status and regard when planning applications are submitted and it is disappointing that this opportunity has not been taken to include such a policy for each site.

Implications

23.	Financial	Nil
	Legal	Nil
	Staffing	Nil
	Risk Management	Nil
	Equality and Diversity	Nil
	Equality Impact Assessment completed	An EIA was carried out on the SSPP and consideration given to each site included in the plan.
	Climate Change	The MWDP promotes recycling of waste and the efficient use of mineral resources.

Consultations

24. Consultation has taken place with Environmental Health and the Conservation officer.

Consultation with Children and Young People

25. Not applicable.

Effect on Strategic Aims

26. AIM A – We are committed to being a listening Council, providing first class services accessible to all.

The Council is responding on behalf of the residents of the district to the consultation.

27. AIM B – We are committed to ensuring that South Cambridgeshire continues to be a safe and healthy place for you and your family.

By responding to the consultation the Council will ensure that the needs of the local residents in South Cambridgeshire are considered.

28. AIM C – We are committed to making South Cambridgeshire a place in which residents can feel proud to live.

By responding to the consultation the Council will ensure that the needs of the residents of South Cambridgeshire are taken account of.

29. AIM D – We are committed to assisting provision of local jobs for you and your family.

The adopted SSPP will provide assurances for the mineral and waste industries within South Cambridgeshire and ensure that the future needs of the development industry will have sufficient minerals and that the residents of the district sufficient waste facilities. Waste and mineral activities within the district could provide for local jobs.

30. AIM E – We are committed to providing a voice for rural life.

The Council in responding to the consultation will ensure that the Inspector considers the needs of the rural communities in South Cambridgeshire.

Conclusions

31. Many of the changes included in the current consultation are supported but there are reservations about the inclusion of all the borrowpits to be used for any future A14 road scheme improvements.

Appendices

A – Schedule showing the significant changes proposed to the SSPP as they relate to South Cambridgeshire

B – Schedule showing the minor changes proposed to the SSPP as they relate to South Cambridgeshire and the response by the Council.

C – Extract from Report to Planning and New Communities Joint Portfolio Holders on 2 March 2010 responding to the Pre- submission consultation relating to borrowpits.

D – Revise maps for Cottenham SSP M1A

Background Papers: the following background papers were used in the preparation of this report:

- Significant Changes Schedule to the Submission Plan August 2011 – Consultation document
- Minor Changes Schedule to the Submission Plan August 2011 – Consultation document
- Pre –Submission draft of Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan
- Report to Planning and New Communities Joint Portfolio Holders on 2 March 2010 responding to the Pre- submission consultation

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Appendix A

Significant changes schedule to the Submission Plan – consultation version August 2011

Ref no is for the number of the change in the consultation.

The Plan reference refers to the Pre- submission version of the Site Specific Proposals Plan DPD.

The words in **bold** have been added and those with a line through are to be deleted – ~~word~~

Significant changes relating to borrowpits –

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
SSP S1	Document CO3 Section 3 Paragraph 3.10	Amend to read: The Mineral Planning Authorities are aware of the long standing plans for the proposed improvements of to the A14 trunk road between, Ellington to the west of Huntingdon and Fen Ditton to the northeast of Cambridge, that will require exceptionally large quantities of sand and gravel. However, the Government has confirmed that it can not fund this scheme principally because in its current form, it is unaffordable. Approximately 2 million tonnes of sand and gravel will be required. However, Government has recognised the economic importance of this route and that congestion is a serious problem and therefore remain committed to developing a solution. Work has now begun on the Strategic Corridor Study with the aim of identifying a viable way forward, including exploring alternative methods for managing traffic volumes, considering potential delivery mechanisms, and potential future improvements. A package of alternative proposals for improving the A14 are anticipated to be forthcoming during the lifetime of this Plan. Consequently Areas of Search for A14 borrowpits are proposed as it is still anticipated that mineral resources for some form of scheme will be needed within the lifetime of the Plan (up to 2026). The future release of mineral will be commensurate with the need for mineral for improvements to the A14	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
		<p>only. Borrowpit allocations have, therefore, been identified for this project only. Any proposals to extend the life of these borrowpits to serve the open market will be resisted will be considered in the context of Core Strategy Policy CS13 Additional Mineral Extraction.</p>	
SSP S3	Document CO3, Section 3, Paragraph 3.30	<p>Amend to read: Borrowpits are extraction sites which supply a single project only for a temporary period. They arise where major civil engineering proposals come forward e.g. for road improvement schemes and where there are aggregate and other minerals available in the immediate area. The Minerals Planning Authorities are aware of the long standing plans for the proposed improvement of the one large road scheme which will require exceptionally large quantities of engineering clay of around 2.5 million cubic metres. This is the proposed improvement of the A14 trunk road between Ellington to the west of Huntingdon, and Fen Ditton to the northeast of Cambridge and the associated likely requirements for significant quantities of engineering clay for improvement works. However, the Government has confirmed that the current proposed A14 improvement scheme has now been withdrawn principally because it is unaffordable. Government has however recognised the economic importance of this strategic route and that congestion is a serious problem and therefore remain committed to developing a solution. Work has now begun on the Strategic Corridor Study with the aim of identifying a viable way forward, including exploring alternative methods for managing traffic volumes, considering potential delivery mechanisms, and potential future improvements. A package of alternative proposals for improving the A14 are anticipated to be forthcoming during the lifetime of this Plan. Consequently Areas of Search for A14 borrowpits are proposed as it is still anticipated that mineral resources for some form of scheme will be needed at a point within the lifetime of the Plan (up to 2026). The future release of mineral will be commensurate with the need for</p>	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
		mineral for improvements to the A14 only. Given that this is a significant quantity of material an exception is made and borrowpit allocations are identified for this project only. Any proposals to extend the life of these borrowpits to serve the open market will be resisted will be considered in the context of Core Strategy Policy CS13 Additional Mineral Extraction.	
SSP S4	Document CO3, Section 3, Policy SSP M7, Engineering Clay Borrowpit Allocations	Amend to read: The site specific Area of Search allocations for engineering clay borrowpits to serve the A14 improvements upgrade future the A14 improvements only are: - Table: Amend Road Scheme Column (all rows) to read: Future A14 Improvement A14 Ellington to Fen Ditton, Cambridgeshire A site profile for each for engineering clay Area of Search allocation is provided in chapter 7.	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S12	Document C03, Section 7, Site Profile M2A - Galley Hill Fenstanton (M9I), Paragraph 7.18, Implementation Issues	Amend 1st bullet point to read: • Suitable as borrowpit for A14 upgrade improvement only Add additional bullet point to the list of implementation issues: • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S23	Document C03, Section 7, Title 7.7, Clay	Amend titles to read: 7.7 Area of Search Allocations for Engineering Clay Borrowpits - Site Profiles Area of Search Allocations for Engineering Clay Borrowpits	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
	borrowpit site profiles	Allocations	certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S24	Document C03, Section 7, Paragraph 7.37 and related table	Amend Paragraph 7.37, first sentence, to read: The extent of the Area of Search allocations for engineering clay borrowpits to serve future improvement of the A14 road scheme are shown on the inset maps that follow. Table: Amend Road Scheme Column to read: Future A14 Improvement A14 Ellington to Fen Ditton, Cambridgeshire	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S25	Document C03, Section 7, Site Profile M7A - Boxworth End Farm, North of Trinity Foot Jct, Summary	Amend to read: Site Name: Boxworth End Farm, North of Trinity Foot Junction (Area of Search) Description of Proposed Use: Clay and general fill borrowpit for future improvement of the A14 Estimated Reserve: 117,500 m3 Area: 11.9 (ha) Approximate Timescale: Jan 2012 – Jan 2015 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Swavesey (adjacent to parishes Boxworth & Conington) Grid Ref: TL 354 663	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S26	Document C03, Section 7, Site Profile M7A - Boxworth End Farm, North of	Amend 1st bullet point to read: • Suitable as a borrowpit for A14 upgrade improvements only Amend 2nd bullet point to read: • Route of A14 upgrade In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
	Trinity Foot, Paragraph 7.40, Implementation Issues	(including slip roads) should be safeguarded against mineral extraction Add additional bullet point to the list of implementation issues: • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only	support future A14 improvements.
SSP S27	Document C03, Section 7, Site Profile M7B - Brickyard Farm, Boxworth, Summary	Amend to read: Site Name: Brickyard Farm, Boxworth (Area of Search) Description of Proposed Use: Clay - and general fill for borrowpit for future improvement of the A14 upgrade Estimated Reserve: 75,000 m3 Area: 104.6 (ha) Approximate Timescale: Jan 2012 – Jan 2015 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Boxworth (Conington (S), Swavesey, Fen Drayton & Lolworth are adjacent parishes) Grid Ref: TL 349 657	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S28	Document C03, Section 7, Site Profile M7B - Brickyard Farm, Boxworth, Paragraph 7.42, Implementation Issues	Amend 1st bullet point to read: • Suitable as a borrowpit for A14 upgrade improvement only Amend 2nd bullet point to read: • Route of A14 In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slip roads) should be safeguarded against mineral extraction Add additional bullet point to the list of implementation issues: • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S29	Document C03,	Amend to read: Site Name: New Barns Farm, Conington, (Area of Search)	To reflect the withdrawal of the A14 upgrade scheme and

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
	Section 7, Site Profile M7C - New Barns Farm, Conington, Summary	Description of Proposed Use: Clay - and general fill borrowpit for future improvement of the A14 upgrade Estimated Reserve: 50,000 m3 Area: 129.9 (ha) Approximate Timescale: Aug 2012 – Aug 2014 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Conington (S) (adjacent to Boxworth, Swavesey & Fen Drayton parishes) Grid Ref: TL 336 664	current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S30	Document C03, Section 7, Site Profile M7C - New Barns Farm, Conington, Paragraph 7.44, Implementation Issues	Amend 1st bullet point to read: • Suitable as a borrowpit for the A14 upgrade improvement only Amend 2nd bullet point to read: • Route of the A14 upgrade In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slipways) should be safeguarded against mineral extraction Add additional bullet point to the list of implementation issues: • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S31	Document C03, Section 7, Site Profile M7D - North Bar Hill, Noon Folly Farm, Summary	Amend to read: Site Name: North Bar Hill, Noon Folly Farm (Area of Search) Description of Proposed Use: Clay - and general fill borrowpit for future improvement of the A14 upgrade Estimated Reserve: 2,500 m3 Area: 9.9 (ha) Approximate Timescale: Jan 2012 – Nov 2015 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.

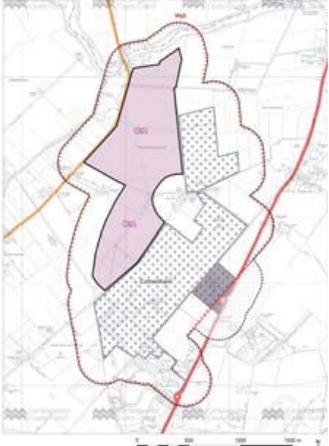
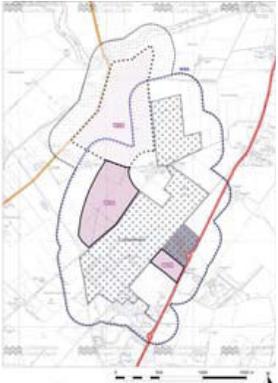
Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
		Parish: Swavesey & Longstanton (adjacent to Lolworth & Bar Hill) Grid Ref: TL 380 644	
SSP S32	Document C03, Section 7, Site Profile M7D - North Bar Hill, Noon Folly Farm (M9P), Paragraph 7.46, Implementation Issues	Amend 1st bullet point to read: • Suitable for use as borrowpit for A14 upgrade improvement only Amend 2nd bullet point to read: • No mineral extraction will be permitted on the line of the A14 upgrade In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slipways) should be safeguarded against mineral extraction Add additional bullet point to the list of implementation issues: • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S33	Document C03, Section 7, Site Profile M7E - North Dry Drayton Junction, Slate Hall Farm, Summary	Amend to read: Site Name: North Dry Drayton Junction, Slate Hall Farm (Area of Search) Description of Proposed Use: Clay - and G general F fill borrowpit for future improvement of the A14 upgrade Estimated Reserve: 245,000 m3 Area: 27.9 (ha) Approximate Timescale: Jan 2012 – April 2014 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Oakington & Westwick, Girton (adjacent to parish Dry Drayton) Grid Ref: TL 401 628	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S34	Document C03, Section 7, Site	Amend 1st bullet point to read: • Suitable for borrowpit for A14 upgrade improvement only	To reflect the withdrawal of the A14 upgrade scheme and current work being

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
	Profile M7E - North Dry Drayton Junction, Slate Hall Farm, Paragraph 7.48, Implementation Issues	<p>Amend 7th bullet point to read:</p> <ul style="list-style-type: none"> No mineral extraction will not be permitted on the line of the A14 upgrade route In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slipways) should be safeguarded against mineral extraction <p>Add additional bullet point to the list of implementation issues:</p> <ul style="list-style-type: none"> The release of mineral will be commensurate with the need for mineral for improvements to the A14 only 	undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S35	Document C03, Section 7, Site Profile M7F - North Junction 14, Grange Farm, Summary	<p>Amend to read:</p> <p>Site Name: North Junction 14, Grange Farm (Area of Search)</p> <p>Description of Proposed Use: Clay borrow Ppit for future improvement of the A14 upgrade</p> <p>Estimated Reserve: 125,000 m3</p> <p>Area: 35.8 (ha)</p> <p>Approximate Timescale: Jan 2012 – Nov 2015 Extraction to be linked to future improvement of the A14</p> <p>District: South Cambridgeshire</p> <p>Parish: Girton</p> <p>Grid Ref: TL 408 625</p>	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S36	Document C03, Section 7, Site Profile M7F - North Junction 14, Grange Farm, Paragraph 7.50,	<p>Amend 1st bullet point to read:</p> <ul style="list-style-type: none"> Suitable for borrowpit use for A14 upgrade improvement only <p>Amend 5th bullet point to read:</p> <ul style="list-style-type: none"> No mineral extraction will be permitted on the proposed A14 route In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slip roads) should be safeguarded against mineral extraction 	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
	Implementation Issues	Add additional bullet point to the list of implementation issues: <ul style="list-style-type: none"> • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only 	
SSP S37	Document C03, Section 7, Site Profile M7G - South Junction 14, Girton, Madingley, Summary	Amend to read: Site Name: South Junction 14, Girton, Madingley (Area of Search) Description of Proposed Use: Clay – and general fill borrowpit for future improvement of the A14 upgrade Estimated Reserve: 90,000 m3 Area: 29.8 (ha) Approximate Timescale: Jan 2012 – Nov 2015 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Girton - Madingley Grid Ref: TL 408 614	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S38	Document C03, Section 7, Site Profile M7G - South Junction 14, Girton, Madingley, Paragraph 7.52, Implementation Issues	Amend 1st bullet point to read: <ul style="list-style-type: none"> • Suitable for use as a borrowpit for the A14 upgrade-improvement only Amend 2nd bullet point to read: <ul style="list-style-type: none"> • No mineral extraction will be permitted on line of A14 upgrade In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slip roads) should be safeguarded against mineral extraction Add additional bullet point to the list of implementation issues: <ul style="list-style-type: none"> • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only 	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S39	Document C03, Section 7, Site	Amend to read: Site Name: South of Trinity Foot Junction – East (Area of Search) Description of Proposed Use: Clay and general fill borrowpit for future	To reflect the withdrawal of the A14 upgrade scheme and current work being

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
	Profile M7H - South of Trinity Foot Junction – East, Summary	<p>improvement of the A14 Estimated Reserve: 202,500 m3 Area: 6.1 (ha) Approximate Timescale: Jan 2012 – Jan 2015 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Swavesey (adjacent to parishes Boxworth & Conington) Grid Ref: TL 371 645</p>	undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S40	Document C03, Section 7, Site Profile M7H - South of Trinity Foot Junction – East, Paragraph 7.54, Implementation Issues	<p>Amend 1st bullet point to read: • Suitable for use as a borrowpit for the A14 upgrade improvement only Amend 2nd bullet point to read: • Route of the A14 In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slip roads) should be safeguarded against mineral extraction</p> <p>Add additional bullet point to the list of implementation issues: • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only</p>	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
SSP S41	Document C03, Section 7, Site Profile M7I - South Trinity Foot Junction – West, Summary	<p>Amend to read: Site Name: South Trinity Foot Junction – West (Area of Search) Description of Proposed Use: Clay - and general fill borrowpit for future improvement of the A14 upgrade Estimated Reserve: 175,000 m3 Area: 5.9 (ha) Approximate Timescale: Jan 2012 – Jan 2015 Extraction to be linked to future improvement of the A14 District: South Cambridgeshire Parish: Lolworth (adjacent to Boxworth & Swavesey) Grid Ref: TL 366 649</p>	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
SSP S42	Document C03, Section 7, Site Profile M71 - South Trinity Foot Junction – West, Paragraph 7.56, Implementation Issues	<p>Amend 1st bullet point to read:</p> <ul style="list-style-type: none"> • Suitable for use as borrowpit for A14 upgrade improvement only <p>Amend 2nd bullet point to read:</p> <ul style="list-style-type: none"> • Route of the proposed A14 upgrade In the event of off road improvements involving a new road crossing this borrowpit site, the route of any new road (including slip roads) should be safeguarded against mineral extraction <p>Add additional bullet point to the list of implementation issues:</p> <ul style="list-style-type: none"> • The release of mineral will be commensurate with the need for mineral for improvements to the A14 only 	To reflect the withdrawal of the A14 upgrade scheme and current work being undertaken; yet still give some certainty regarding the location of mineral extraction to support future A14 improvements.
Significant change relating to Cottenham site			
Ref No.	Plan reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
SSP S7	Document C03, Section 7, Map for Site M1A under Heading 7.1.1 – Cottenham (M9E)	Amend map to show revised existing mineral and waste consent area & consultation area as follows:	Correction of a factual error to show new site area and consultation area

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for proposed change
			
SSP S50	Document C03, Section 8, Map for Site W2B under Heading 8.2.2 – Cottenham (W8K)	<p>Area of Search to be added over the remaining area covered by M1A as follows:</p> 	To reflect restoration proposals for this part of the site which will require a limited amount of inert fill

Appendix B

Minor Changes – part of consultation August 2011

Ref no is for the number of the change in the consultation.

The Plan reference refers to the Pre- submission version of the Site Specific Proposals Plan DPD.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
SSP M29	Document C03, Section 7, Site Profile M1A - Cottenham (M9E), Summary	Amend to read: Description of Proposed Use: Mineral Extraction: Sand and Gravel Estimated Reserve: Approximately 4.1 million tonnes Area: 114.3(ha) Approximate Timescale: Extraction expected to commence around 2014 and last beyond the remainder of the plan period	To be consistent with Site Profile W2B	Support
SSP M30	Document CO3, Section 7, Site Profile M1A Cottenham, Site Characteristics.	Insert five additional bullet points to the list of site characteristics: Within airfield safeguarding zone for Cambridge Airport Ancient Monuments are adjacent to this site Rights of Way within and adjacent the site Potential for protected species on site (water voles) The whole area is archaeologically sensitive and contains extensive known archaeological remains.	To avoid inconsistency with Site Profile W2B and implementation issues To ensure the Plan is effective To avoid inconsistency with Site Profile W2B and implementation issues	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		Amend 2nd bullet point to read: Constraints of floodrisk, groundwater protection, impact upon the Great Ouse River Corridor and other wildlife habitats and archaeology		
SSP M31	Document CO3, Section 7, Site Profile M1A Cottenham, Paragraph 7.3, Implementation Issues.	Amend 4th bullet point to read: Potential for overall restoration scheme to contribute to agricultural restoration following infilling in the southern sector of the site. The northern area has potential for biodiversity after use enhancing the Great Ouse River corridor with public access Restoration of the northern area will be complementary to the biodiversity objectives of the Great Ouse Wetland, including enhanced public access. This may involve the use of a limited amount of inert fill. The southern part of the site will be restored to an agricultural afteruse at original levels through the deposit of inert fill Amend 7th bullet point to read: Archaeology will require mitigation Full archaeological evaluation would be needed to inform the planning application and the mitigation strategy which may include removing areas from development to physically preserve archaeological remains of particular significance in situ. Any application would also need to consider the effects of water drawdown and de-watering	To clarify restoration proposals for the site (including the link between extraction and restoration) and to be consistent with Site Profile W2B To ensure the Plan is effective To correct terminology	It is to be noted that the 4 th bullet point is related to a significant change SSP S50 that is referred to in the main report. Support amendments.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		<p>of archaeological sites beyond the application boundary</p> <p>Amend 13th bullet point to read: The design of restoration proposals to take account of the setting of Scheduled Ancient Monuments and possible birdstrike issues</p> <p>Amend last bullet point to read: Need to consider any isolated extraction pits which have been highlighted for further investigation under part 2a of the Contaminated Land Regulations by South Cambridgeshire District Council</p> <p>Add additional bullet point to the list of implementation issues: The rate of extraction should be linked to the rate of restoration so that they both proceed on a related and phased basis</p> <p>Add additional bullet point to the list of implementation issues: An adequate buffer should be left between the site and the river and a Hydrological and Hydro-Geological Assessment will be required. This should demonstrate that the river will not be adversely affected by dewatering.</p>	<p>To correct the grammar and the typological error</p> <p>To be consistent with Site Profile W2B</p> <p>To provide clarity</p>	
SSP	Document CO3,	Add additional bullet point to the list of site	To be consistent with Site	Support.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
M56	Section 7, Site Profile M4A, Barrington, Site Characteristics.	characteristics: Eversden & Wimpole Woods SSSI, SAC are to the west /north west of this site	Implementation Issues	
SSP M57	Document C03, Section 7, Site Profile M4A – Barrington (M9B), Paragraph 7.33, Implementation Issues.	<p>Add three additional bullet points to the list of implementation issues:</p> <p>Information to enable a Habitats Regulations Assessment at the project level will need to be supplied to ascertain there will not be an adverse effect on the integrity of any European site.</p> <p>Where the proposal is likely to result in significant environmental effects, such as impacts on a SSSI, information to inform an Environmental Impact Assessment (EIA) will be required at the application stage.</p> <p>Archaeological potential of this site is unknown. Any planning application will therefore need to address the archaeological significance of the site through assessment and evaluation</p> <p>Amend 2nd bullet point to read: New landscaping An assessment of the visual impact of the proposed development taking into account the Landscape Character Area in which the site is located and its relationship with the existing quarry</p>	To take account of the Landscape Character Area, provide clarity and ensure the Plan is effective	Support particularly the recognition of the importance of having regard to the impact of the proposed development on Eversden and Wimpole Woods SSSI and the importance of considering the future visual impact of the proposal on the Landscape Character Area.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		Amend 12th bullet point to read: A Hydro-Geological Assessment will be required in support of any planning application. This assessment and proposed mitigation measures must address impacts, Assessment of hydrological issues including those related to dewatering and ground and surface water hydrology matters. This should include any temporary or permanent alteration to the flow of groundwater during operation or restoration. Groundwater flows must not be adversely affected		
SSP M58	Document CO3, Section 7, Site Profile M7A, Boxworth End Farm, North of Trinity Foot, Site Characteristics.	Add additional bullet point to the list of site characteristics: Sensitive receptors in proximity to the site (residential and light industrial)	To be consistent with Site Implementation Issues	Support
SSP M59	Document C03, Section 7, Site Profile M7A – Boxworth End Farm, North of Trinity Foot Jct (M9C), Paragraph 7.40, Implementation Issues.	Amend 6th bullet point to read: Archaeological issues should be considered at planning application stage Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure the Plan is effective	Support
SSP	Document CO3	Amend 4th bullet point to read:	To ensure the Plan is	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
M60	Section 7, Site Profile M7D – North Bar Hill, Noon Folly Farm (M9P), Site Characteristics.	Area is archaeologically sensitive and is within an Within area of archaeological interest for ridge and furrow field systems	effective	
SSP M61	Document CO3 Section 7, Site Profile M7D – North Bar Hill, Noon Folly Farm (M9P), Paragraph 7.46, Implementation Issues	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure the Plan is effective	Support For consistency bullet 4 should also be deleted otherwise archaeological issues are considered twice.
SSP M62	Document CO3, Section 7, Site Profile M7E North Dry Drayton Junction, Slate Hall Farm, Site Characteristics.	Add additional bullet point to the list of site characteristics: Site is located adjacent to the line of the road linking the Roman towns of Cambridge and Godmanchester, there is a high potential for prehistoric and Roman agriculture and settlement in the area	To ensure the Plan is effective	Support
SSP M63	Document CO3, Section 7, Site Profile M7E North Dry Drayton Junction, Slate Hall Farm, Paragraph 7.48, Implementation	Amend 4th bullet point to read: Any archaeological concerns will need to be addressed at planning application stage Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure the Plan is effective	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	Issues.			
SSP M64	Document CO3, Section 7, Site Profile M7F north Junction 14, Grange Farm, Site Characteristics.	Add additional bullet point to the list of site characteristics: Site is located adjacent to the line of the road linking the Roman towns of Cambridge and Godmanchester, probable medieval manor to the south east. Ridge and furrow traces of medieval origin	To ensure the Plan is effective	Support
SSP M65	Document CO3, Section 7, Site Profile M7F north Junction 14, Grange Farm, Paragraph 7.50, Implementation Issues.	Amend 2nd bullet point to read: Archaeological issues should be considered at planning application stage Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure consistency in site Profiles	Support
SSP M66	Document CO3, Section 7, Site Profile M7G South Junction 14, Paragraph 7.52, Implementation Issues.	Delete 10th bullet point: The site is within Green Corridor 23 Cambridge Outer Orbital corridor, restoration should look at any potential for contributing to this	To avoid duplication	Support
SSP M67	Document CO3, Section 7, Site Profile M7H South of Trinity Foot Junction East, Site Characteristics.	Add additional bullet point to the list of site characteristics: Site is located adjacent to the line of the road linking the Roman towns of Cambridge and Godmanchester. Evidence of medieval settlement in the vicinity of Lolworth Deserted Medieval settlement and a moated	To ensure the Plan is effective	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		site to the south		
SSP M68	Document CO3, Section 7, Site Profile M7H South of Trinity Foot Junction East, Paragraph 7.54, Implementation Issues.	Amend 4th bullet point to read: Any archaeological concerns will need to be addressed at planning application stage Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure consistency in site Profiles	Support
SSP M69	Document CO3, Section 7, Site Profile M7I South of Trinity Foot Junction West, Site Characteristics.	Add additional bullet point to the list of site characteristics: Site is located adjacent to the line of the road linking the Roman towns of Cambridge and Godmanchester. Traces of medieval ridge and furrow	To ensure the Plan is effective	Support
SSP M70	Document CO3, Section 7, Site Profile M7I South of Trinity Foot Junction West, Paragraph 7.56, Implementation Issues.	Amend 4th bullet point to read: Some archaeological concerns which will need to be addressed at planning application stage Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure consistency in site Profiles	Support
SSP M85	Document CO3, Section 8, Profile W1D, Brookfield Business Park, Cottenham, Site Characteristics.	Add additional bullet point to the list of site characteristics: Site located in area of high archaeological potential	To ensure archaeological concerns are included consistently in Site Profiles	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
SSP M86	Document CO3, Section 8, Profile W1D, Brookfield Business Park, Cottenham, Paragraph 8.10, Implementation Issues.	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure archaeological concerns are included consistently in Site Profiles	Support
SSP M87	Document CO3, Section 8, Profile W1E, Cambridge East, Site Characteristics.	Amend 7th bullet point to read: Archaeologically sensitive site Site located in area of high archaeological potential	To ensure archaeological concerns are included consistently in Site Profiles	Support
SSP M88	Document C03, Section 8, Site Profile W1E – Cambridge East (W8H), Paragraph 8.12, General Implementation Issues.	Add three additional bullet points to the list of implementation issues: Where the proposal is likely to result in significant environmental effects, such as impacts on a SSSI, information to inform an Environmental Impact Assessment (EIA) will be required at the application stage Any planning application will need to address the archaeological significance of the site through assessment and evaluation Regard should be had to the master planning of Cambridge East, and the need to secure the residential amenity of existing and planned communities	To provide clarity in the general implementation section of the profile and ensure archaeological concerns are included consistently in Site Profiles	Support Welcome the inclusion of last bullet point that regard should be had to the master planning of Cambridge East etc....
SSP M89	Document CO3, Section 8, Profile	Amend 1st bullet point to read: All new Household Recycling Centres, will be	To correct a grammatical error and to remove	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	W1E, Cambridge East, Paragraph 8.12 Household Recycling Facility Implementation Issues.	required to be of a high standard in their design and operation in order to minimise any adverse effects on the environment or local community. This will entail waste operations being enclosed within a building with appropriate mitigation measures including dust / odour suppression Delete last bullet point: The proposal must be consistent with “The Location & Design of Waste Management Facilities” Supplementary Planning Document	repetition of Core Strategy requirements	
SSP M90	Document CO3, Section 8, Profile W1E, Cambridge East, Paragraph 8.12, Material Recovery Facility Implementation Issues.	Amend 1st bullet point to read: The new materials recovery facility will be required to be of a high standard in it’s design and operation in order to minimize any adverse effects on the environment or local community. This will entail waste operations being enclosed within a building with appropriate mitigation measures including pollution control / dust / odour suppression Delete last bullet point: The proposal must be consistent with “The Location & Design of Waste Management Facilities” Supplementary Planning Document	To correct a grammatical error and to remove repetition of Core Strategy requirements	Support
SSP M91	Document CO3, Section 8, Profile W1E, Cambridge East, Paragraph 8.12, Temporary	Delete 5th and 6th bullet points: — Catchment area restrictions — The proposal must be consistent with “The Location & Design of Waste Management Facilities” Supplementary Planning Document	To remove repetition of Core Strategy requirements	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	Construction Waste Recycling and Recovery Implementation Issues.			
SSP M92	Document CO3, Section 8, Profile W1F Cambridge Northern Fringe, Site Characteristics.	Amend 4th bullet point to read: Close to sensitive receptors (namely employment areas and residential settlements) that would need to be taken into account	To avoid duplication of an Implementation Issue	Support
SSP M93	Document CO3, Section 8, Profile W1F Cambridge Northern Fringe, Paragraph 8.15, Implementation Issues.	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation Delete 7th bullet point: —Proposal must be consistent with “The Location & Design of Waste Management Facilities” Supplementary Planning Document	To ensure archaeological concerns are included consistently in Site Profiles and remove repetition of Core Strategy requirements	Support
SSP M94	Document CO3, Section 8, Profile W1F Cambridge Northern Fringe, Paragraph 8.16, Inert Waste Recycling / Transfer	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation	To ensure archaeological concerns are included consistently in Site Profiles	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	Implementation Issues.			
SSP M102	Document CO3, Section 8, Profile W1K, Extn to Waste Management Park, Waterbeach, Summary.	Delete 2nd row: Type: Recycling Facility; Energy from Waste; Composting and Inert Waste Recycling	To avoid duplication	Support
SSP M103	Document CO3, Section 8, Profile W1K, Extn to Waste Management Park, Waterbeach, Site Characteristics.	Delete 6th bullet point: — Vehicular access would need to be gained via the roundabout to the Waste Management Park	Duplicates an Implementation Issue	Support
SSP M104	Document CO3, Section 8, Profile W1K, Extn to Waste Management Park, Waterbeach, Paragraph 8.26, Implementation Issues.	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation Delete 1st bullet point: — Design of buildings /structures should accord with “The Location & Design of Waste Management Facilities” Supplementary Planning Document.	To ensure archaeological concerns are included consistently in Site Profiles, avoid repetition of Core Strategy requirements and to correct spelling mistake and avoid duplication	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		Amend 10th bullet point to read: any proposals will need to consider residential properties nearby, including Denney Abbey cottages to the west and east of the A10 Delete 13th bullet point: —Any proposals will need to consider residential properties nearby, including Denney Abbey cottages to the east of the A10		
SSP M105	Document CO3, Section 8, Profile W1L Great Wilbraham Quarry, Great Wilbraham, Summary.	Amend to read: Description of Proposed Use: Waste Recycling and Recovery Inert Waste Recycling Type: Inert Waste Recycling Area: Less than 1 ha Approximate Timescale: Dependant on demand and market forces District: South Cambridgeshire Parish: Great Wilbraham	To ensure consistency in Site Profiles	Support
SSP M119	Document CO3, Section 8, Profile W1T, Northstowe, Summary.	Amend to read: Description of Proposed Use: Waste Recycling and Recovery Temporary Inert Waste Recycling Type: Temporary Inert Waste Recycling	To ensure consistency in Site Profiles	Support
SSP M120	Document CO3, Section 8, Profile W1T, Northstowe, Site Characteristics.	Amend 3rd bullet point to read: The area has archaeological value which should be considered The site is located in a landscape of high archaeological potential	To avoid duplication and ensure consistency between Site Profiles	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		Amend 4th bullet point to read: The Area of Search overlaps two conservation areas (Longstanton to the west and Westwick to the south east) , and that care should be taken to avoid any negative impact on the character and setting of these conservation areas and a number of listed buildings including highly graded churches		
SSP M121	Document CO3, Section 8, Profile W1T, Northstowe, Paragraph 8.44, Implementation Issues.	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation Amend 1st bullet point to read: Location of the site or sites should not be close to sensitive receptors e.g. residential properties Amend 6th bullet point to read: The Area of Search overlaps two conservation areas (the Longstanton to the west and Westwick Conservation Areas. to the south east) , and that e Care should be taken to avoid any negative impact on the character and setting of these conservation areas and a number of listed buildings including highly graded churches	To give flexibility to have one large or more smaller inert waste recycling facilities, ensure archaeological concerns are included consistently in Site Profiles and to improve the grammar	Support
SSP M122	Document CO3, Section 8, Profile	Amend to read: Northstowe Area 2 (Area of Search)	To provide clarification that this allocation is an area of	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	W1U, Northstowe Area 2, Northstowe, Summary – Site Name.		search	
SSP M123	Document CO3, Section 8, Profile W1U, Northstowe Area 2, Northstowe, Paragraph 8.46, Implementation Issues.	Add additional bullet point to the list of implementation issues: Any planning application will need to address the archaeological significance of the site through assessment and evaluation Delete last bullet point: — Proposal must be consistent with the “Location & Design of Waste Management Facilities” Supplementary Planning Document.	To ensure archaeological concerns are included consistently in Site Profiles and avoid repetition of Core Strategy requirements	Support
SSP M127	Document CO3, Section 8, Profile W1X South of Addenbrookes Access Road, Summary.	Amend to read: Description of Proposed Use: Waste Recycling and Recovery Household Recycling Centre Type: Household Recycling Centre	To ensure consistency in presentation of Site Profiles	Support
SSP M128	Document CO3, Section 8, Profile W1X South of Addenbrookes Access Road, Site Characteristics.	Add two additional bullet points to the list of site characteristics: Investigation in advance of the construction of the Addenbrookes Access Road revealed evidence of Iron Age settlement and there is further evidence of late prehistoric or Roman settlement to the south	To ensure archaeological concerns are included in Site Profiles and to reflect the availability of additional land for landscaping and mitigation works	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		Land to the East of the allocation is available for additional landscaping / mitigation		
SSP M129	Document C03, Section 8, Site Profile W1X – South of Addenbrookes Access Road, Cambridge (W8AV), Paragraph 8.52, Implementation Issues.	<p>Add three additional bullet points to the list of implementation issues:</p> <p>Where the proposal is likely to result in significant environmental effects, such as impacts on a SSSI, information to inform an Environmental Impact Assessment (EIA) will be required at the application stage</p> <p>Any planning application will need to address the archaeological significance of the site through assessment and evaluation</p> <p>A Transport Assessment in support of any planning application will be required</p> <p>Delete 4th bullet point: —Any proposal will need to accord with “The Location & Design of Waste Management facilities” Supplementary Planning Document</p>	To provide clarity, ensure archaeological concerns are included consistently in Site Profiles and avoid repetition of Core Strategy requirements	Support
SSP M156	Document C03, Section 8, W2B Cottenham, Summary	<p>Amend to read:</p> <p>Description of Proposed Use: Inert landfill and restoration back to agriculture (following sand and gravel extraction)</p> <p>North: Area of Search for inert landfill associated with the restoration of this area to a biodiversity afteruse complementary to the Great Ouse Wetland</p> <p>South: Site specific allocation for inert landfill with restoration back to agriculture</p>	To clarify restoration proposals for the site and reflect addition of an Area of Search for the deposit of inert fill to the north of the existing W2B site specific allocation	Support – this is linked to a significant change and has been considered in the main report.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
		<p>Estimated Reserve: Extraction expected to commence around 2014 and last for approximately 15 years</p> <p>Estimated Voidspace: 780,000 m3 Volume North: the volume of inert fill will be commensurate with that needed to secure restoration objectives</p> <p>South: 680,000 – 720,000 m3</p> <p>Area: 414ha 38.9 ha</p> <p>North: 75 ha</p> <p>South: 39 ha</p> <p>Approximate Timescale: Dependant on demand and market conditions Expected to commence around 2014 as linked to mineral extraction at Site M1A</p> <p>District: South Cambridgeshire Parish: Cottenham (adjacent to Haddenham, Landbeach, Waterbeach, Stretham & Wilburton) Grid Ref: TL 480 701</p>		
SSP M157	Document CO3, Section 8, Profile W2B Cottenham, Site Characteristics.	<p>Add additional bullet point to the list of site characteristics:</p> <p>Ancient Monuments are adjacent to this site</p>	To ensure consistency with para 8.78	Support
SSP M158	Document C03, Section 8, Site Profile W2B – Cottenham (W8K), Paragraph 8.78, Implementation	<p>Add additional bullet point to the list of implementation issues:</p> <p>A Hydrological and Hydro-Geological Assessment will be required. The assessments must look at all stages of excavation and restoration, which will need</p>	To provide clarity, correct terminology, ensure archaeological concerns are included consistently in Site Profiles, clarify the restoration proposals for the	Support and note that this is related to a significant change that has been considered in the main report.

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	Issues.	<p>to include flood risk and surface water drainage.</p> <p>Amend 4th bullet point to read: Restoration scheme to Restoration of the Area of Search will be complementary to the biodiversity objectives of the Great Ouse Wetland, including enhanced public access. This may involve the use of a limited amount of inert fill. The southern part of the site will be restored to an agricultural after use at original levels through the deposit of inert landfill</p> <p>Amend 6th bullet point to read: —Archaeological assessment required and mitigation where appropriate Any planning application will need to address the archaeological significance of the site through assessment and evaluation</p> <p>Amend 7th bullet point to read: Ecological and environmental assessment & mitigation required, include ing protected species surveys & hydrological assessment</p> <p>Amend 11th bullet point to read: The design of restoration proposals to take account of the setting of Scheduled Ancient Monuments and possible birdstrike issues</p>	site and reflect the addition of an Area of Search for the deposit of inert fill to the north of the existing W2B site specific allocation	
SSP M170	Document CO3, Section 9, Transport	Add additional bullet point to the list of site characteristics: Site lies within an area of high	To ensure consistency in presentation of profiles	Support

Ref no.	Plan Reference	Proposed changes by Cambridgeshire County and Peterborough City Councils	Reason for change	Response by South Cambs
	Protection Zones, Profile T1A, North of Chesterton Sidings, Site Characteristics.	archaeological potential		
SSP M171	Document CO3, Section 9, Transport Protection Zones, Profile T1A, North of Chesterton Sidings, Paragraph 9.3, Implementation Issues.	<p>Delete 1st bullet point: —Development of this site could be undertaken without compromising the existing or future expansion of the Cambridge Waste Water Treatment Works (WWTW).</p> <p>Amend 9th bullet point to read: The site lies within an area of high archaeological potential, archaeological assessment and mitigation will be required Any planning application will therefore need to address the archaeological significance of the site through assessment and evaluation</p>	To avoid stating facts within the implementation section and ensure archaeological concerns are included consistently in Site Profiles	Support

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Appendix C - Borrowpits

Extract from Report to Planning and New Communities Joint Portfolio Holders on 2 March 2010 responding to the Pre- submission consultation

Borrow pits for use in the A14 improvements.

- 41 In the consultation in 2008 Costain and Lafarge who are both working with the Highway Authority proposed 13 clay- general borrow pit sites, which are located either adjacent to or very close to the route of the current or proposed line of the upgraded A14. The County Council then consulted upon these sites in 2009 and the comments submitted by South Cambs are contained within Appendix 5.
- 42 It should be noted that all of the clay borrow pits identified to serve the A14 improvements are all within South Cambridgeshire. Those that had previously been identified in other districts in the consultation in 2009 have not been allocated in the proposed Submission MWSSP. As part of the consultation there is additional information available on the County's website relating to the A14. This states - *The A14 scheme will require large quantities of clay as engineering fill. The fill is used to construct embankments for the road and whilst some may be sourced from within the scheme (from "cut and fill" engineering), the Plan makes provision for 9 general fill borrowpits to be constructed alongside the road primarily between Histon and Fen Drayton. At the eastern end of the scheme, suitable clay fill may be available from a local landfill site.* These nine borrowpits are those within South Cambs. It is unclear whether this implies clay would have to be transported out of South Cambs to provide for A14 improvements to the north of the district and the traffic implications of this. South Cambs would request that if this clay has to be transported this should be done along haul roads rather than impact on local roads.
- 43 The comments relating to borrowpits submitted for the consultation in 2009 still remain valid and can be summarized as follows –
1. The Highways Agency (HA) has not indicated what quantities of minerals will be required by the A14 works and whether by allocating all the proposed borrow pits there will be a surplus. South Cambs would not support some sites if other less sensitive locations were available.
 2. The timetable for the completion of the MWDP would appear not to coincide with that proposed by the HA to upgrade the A14. Is the MWDP the most appropriate vehicle for providing borrowpits for the A14 upgrade?
 3. Air quality – Concern if all the mineral sites and borrow pits were operating at the same time close to the A14 – there may be a significant degradation of air quality within the A14 Air Quality Management Area (AQMA) within South Cambridgeshire. There is a statutory duty to consider air quality action plans to reduce HCV traffic and bring down pollutant concentrations in the AQMA. The collective impact of the A14 borrowpits may have detrimental short-term impact on local air quality and SCDC's AQMA. Insufficient information has

been included for the Council to assess the cumulative impact on air quality.

4. Air quality – The impact of borrow pits will be over a limited period and the advantages of having them close to construction works could outweigh the dis-benefits highlighted by Environmental Health.
- 44 If the borrowpit allocations are to remain as part of the MWCS the concerns about air quality should be included as a separate paragraph in the supporting text to the policy about clay borrows pit allocations after paragraph 3.22 MWSSP.
- 45 The concern about how many borrowpits will be needed by the Highways Agency and also whether the MWDP is the most appropriate vehicle is further reaffirmed in the information provided on-line by the County during this consultation when it states '*The Highways Agency will clarify how many borrowpits are needed once they have a more accurate idea of their requirements. All borrowpits will require a planning application, which will include public consultation.*' South Cambs is concerned that there is such uncertainty and question whether the borrowpits should be included in the MWDP. If the Highway Authority has been unable to indicate how much clay would be needed for the A14 improvements the currently proposed sites may create a surplus or not be enough! South Cambs in its response to the actual allocated sites would be in favour of some sites if other less environmentally acceptable ones could be rejected. The following table indicates the hierarchy that South Cambs has devised in relation to the borrowpits within the district taking into account planning; conservation and environmental health considerations. Those borrowpits that are placed at 1 in the hierarchy should be used first for improvements to the A14

Figure 1 Hierarchy of borrowpits

Borrowpit	Place in hierarchy	Comments made on this site in Preferred Option 2 consultation 2009
New Barns Farm, Conington (16)	3	Supported with reservations concerning proximity to Conington; impact on wintering site for golden plovers.
Brickyard Farm, Boxworth (15)	1	Supported by South Cambs
Boxworth End Farm, North of Trinity Foot Junction (14)	1	Supported by South Cambs
South Trinity Foot Junction- East (21)	2	Supported with reservations concerning proximity to Lolworth
South Trinity Foot Junction - West (22)	1	Supported by South Cambs
North Bar Hill, Noon Folly Farm (17)	1	Supported by South Cambs
North Dry Drayton Junction, Slate Hall Farm (18)	4	Rejected by South Cambs
North Junction 14, Grange Farm (19)	3	Supported with reservations concerning impact on Beck Brook and

Borrowpit	Place in hierarchy	Comments made on this site in Preferred Option 2 consultation 2009
		site is in Green Belt
South Junction 14 /Girton/ Madingley (20)	2	Supported with reservations concerning site in Green Belt but potential for restoration of site for wetland reserve.

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Background

9. This SPD will provide guidance in relation to the design of waste management facilities as part of residential and commercial developments and the requirements for expanded and/or additional household waste management infrastructure.
10. The purpose of the SPD is to set out a series of development principles and design practice and it is intended to be used by:
 - Developers and designers to ensure effective segregation, storage and collection of waste materials; and
 - Planning Authorities in assessing planning applications to ensure that waste management needs for both residential and commercial developments are adequately addressed and secured.
11. The guidance contained within the SPD relates to policies contained within the adopted Minerals and Waste Core Strategy (MWCS). The particular policies are CS16 covering the provision of Household Recycling Centres and C28 covering Waste Minimisation, Re-use, and Resource Recovery.
12. The Design Guide was originally prepared by consultants Wisser Environment (an Environmental Consultancy) on behalf of RECAP and was subsequently published in 2008. South Cambridgeshire District Council adopted this earlier version as Council Policy in March 2008 pending its adoption as a SPD. The 2008 draft guidance was reviewed and included in the Pre- Submission consultation on the Minerals and Waste Development Plan carried out by Cambridgeshire County and Peterborough City Councils in February / March 2010.
13. South Cambridgeshire District Council responded to the Pre Submission consultation and at the Planning and New Communities Portfolio Holder meeting on 2 March 2010 agreed the comments to be submitted on the draft SPD (See Appendix 1 for the report). The Council had a number of areas of concern regarding this earlier draft particularly about the pre-mature timing of the consultation on the draft SPD; concerns about the ease with which the SPD could be used by both planning officers and by developers when considering waste matters in planning applications and also that there was insufficient information in the SPD to explain how financial contributions towards the provision of Household Recycling Centres would be sought from developers.
14. As a result of the representations submitted to Cambridgeshire County and Peterborough City Councils a Position Statement on the consultation was published in June 2010, which formed part of the evidence base for the examination on the MWCS carried out in December 2010 (See Appendix 2). This statement highlighted the issues raised by objectors and the Councils recognised that additional information should be included in a revised draft of the SPD and therefore there was a commitment from the Councils to carry out further consultation –this current consultation. The Inspector in his report on the examination into the Core Strategy published in March 2011 acknowledged that further revisions were to be made to the SPD but that it was not for him to comment on the content of an SPD.
15. Cambridgeshire County and Peterborough City Councils have prepared a Statement of Consultation that sets out all the representations received during the consultation in 2010 and also outlines the Councils' responses to them and proposed changes to

the draft SPD – <http://www.cambridgeshire.gov.uk/NR/rdonlyres/6F86D33A-9E0B-4A6E-B0F9-67B7EBC58F69/0/1104117appendix.doc>. The County Council's Development Control Committee agreed this document on 11 April 2011. In the draft SPD that has now been published for consultation there are some additional amendments that have been made to the SPD.

Issues for consideration by South Cambridgeshire District Council

16. All the representations submitted by South Cambridgeshire District Council have been included in a schedule in Appendix 3. This outlines each representation; the response by Cambridgeshire County and Peterborough City Councils and amendments made to the draft SPD as agreed in April 2010 and South Cambs response to these changes with proposed changes.
17. It should be recognised that many of the concerns that were made by this Council have been addressed in the revised draft SPD and this is to be welcomed.
18. The main issues of concern for South Cambs are as follows¹ -
19. **SPD user friendly for both developers and planning officers?** (MWRECAP004; 044; 045)
South Cambs when it submitted representations in 2010 wanted to ensure that the SPD be as user friendly as possible and especially the toolkit which is intended to be used by developers when they are submitting planning applications to assist them in including waste issues within their developments. South Cambs suggested that the format of the SPD be looked at again so that the toolkit would be a clearly identifiable part.
20. In the latest revised SPD the toolkit is still contained within the document and could not be pulled out as a separate entity. It does not have anything to differentiate it from the rest of the SPD – different font or format at the top or edge of the page to make it stand out, which is disappointing. Mention had been made in the Statement of Consultation agreed in April 2011 that the toolkit was to be presented as a pullout sheet, which will sit at the front of the guide and cross refer to the relevant parts of the SPD. It is not apparent that has been included in the consultation draft of the SPD since the toolkit is Section 10 of the draft SPD and therefore incorporated into the main body of the document rather than able to be separate it out in a front pocket. No mention has been made of the electronic version or other changes to SPD suggested by South Cambs, which is disappointing.
21. Whilst recognising that the Design Guide contains much useful information it would be improved if the toolkit were able to be a stand-alone document and especially if the electronically available version be separate so that it could be more easily downloaded and completed by a developer. The advice from planning officers that have used the document is that it is too long and complex to make it easy for them and developers to use and would welcome the creation of a summary version of the final adopted SPD to be able to highlight the main issues about waste that a developer would need to know before submitting a planning application.
22. The experience of planning officers in South Cambs is that developers do not use the toolkit regularly when submitting applications. Some training sessions have been

¹ The reference in brackets is that of the representation number recorded by Cambridgeshire County and Peterborough City Councils. (MWRECAP00xx) This reference is used in Appendix 3 of this report.

carried out with planning officers on how to use the guide and more would be welcomed once the SPD has been adopted to ensure that the officers know what information is required within the toolkit and that they can advise applicants accordingly.

23. **Clarity for the developer in knowing the level contributions may be expected from them** (MWRECAP007)

The earlier draft SPD did not highlight clearly to developers that there would be financial implications relating to the provision of waste management infrastructure.

24. The revised SPD has provided some clarification of the financial implications. It states now that the financial implications will vary according to the nature and scale of the proposed development and associated supporting infrastructure and will be based on any additional costs likely to be incurred by the local authority arising out of the proposed development. This is to be welcomed.

25. In the revised SPD in paragraph 8.15 it states that developer contributions established in principle will be subject to *suitable indexation and inflation* applied as appropriate. This should be clarified as to which indexation is to be used because the current wording adds further uncertainty for developers in what may be expected from them.

26. **Household Recycling Centres- the financial implications for developers** (MWRECAP 036, 037, 040, 041 and 042)

The Council was concerned that within the earlier draft there was a lack of information to justify the request for contributions to household recycling centres. This has been addressed in the revised SPD and additional information has been provided. In Cambridgeshire County and Peterborough City Councils' Statement of Consultation it is stated as follows –

'To ensure that developer contributions for additional Cambridgeshire Household Recycling Centres and/or improvements that will be sought are directly related to proposed developments further revisions to the RECAP Waste Management Design Guide are required.

Further work has been undertaken by the County Council's Waste Management Service to determine the scale and nature of the developer contributions, which will be sought for the upgrading of existing Recycling Centres (Alconbury, Wisbech, Whittlesey and Thriplow) and additional capacity/ Recycling Centres (March, St Neots, Witchford and Cambridge area.)

Based upon current assumptions relating to the level of expected housing growth it is not considered that developer contributions will be required for the other Recycling Centres within the County.'

27. As a result Part 8 of the draft SPD relating to Household Recycling Centres has been revised to include details on what size of site a new HRC may require and other details of its design requirements. Part of this additional wording is as follows -

'...New sites in Cambridgeshire will typically be on 1.2 hectares of land, allowing enough flexibility to manage traffic flows of the site, by accommodating split-level easy access for unimpeded traffic movement through the site. This site size will also allow for effective landscaping, as well as the ability, where appropriate, to provide further environmental mitigation in more populated areas by putting the operations

under a roofed area, or in a building. Upgrades to existing sites on the other hand will increase the site capacity by:

- *Extending the site size to improve both skip capacity and traffic circulation*
- *Where possible make the site split level*
- *Improving the existing provision and contract arrangements...'*

28. The revised SPD also provides information about the network of HRCs that will serve Cambridgeshire and a map to show the catchment areas for each of these sites in order to show clearly which HRC a developer may have to contribute to. The catchment areas are grouped by political ward and allocate the existing and projected population to each site. There is also a chart to show the methodology for determining the financial contributions that developers may have to make. (See Appendix 4 for details).
29. Whilst South Cambs recognises that more information has been included into the revised SPD there are still major concerns about whether these amendments will achieve the aim of providing clarity for developers. The methodology is good but it does not go far enough.
30. It is likely that the need for this guidance in the SPD will be limited since when each local planning authority has an agreed schedule of charges for the Community Infrastructure Levy (CIL) the level of contributions for HRCs required will be included with the other requests Cambridgeshire County Council (CCC) will have for infrastructure. However in the intervening period clarity is required if CCC is expecting any contributions from developers towards HRCs.
31. The particular concerns that South Cambs still have are as follows
32. Capital sums required for each HRC
What is the capital sum each HRC requires to fund the necessary relocation / improvement works to the HRC network? (i.e. how does CCC plan to calculate the necessary contributions for each development given that each ward within South Cambs has different needs). This information will be required to understand the total cost of the HRC network in order to incorporate this into the future CIL charging schedule. Although a new table has been included in the revised SPD – Table 8.1 (page 35-37) – it does not include the cost for each HRC, which would be needed for a developer to calculate a contribution using Table 8.2. (It is recognised by South Cambs that it will only be capital not revenue contributions that the CCC would ask for). This information could be included in paragraph 8.10 of the draft SPD that lists the network of HRCs to serve Cambridgeshire. This list would be clearer if the sites were in alphabetical order and detail given on what is required at each site. Since St Neots HRC has already been provided any planning obligations would need to be applied retrospectively – this should be made clear in the SPD.
33. In paragraph 8.15 of the draft SPD it states that an independent assessment of site costs has been carried out. Reference should be made in the SPD as to who carried out this work and when in order for developers to know how to access the site costs information.
34. Catchment Areas
The revised SPD provides a map showing the catchment areas and a schedule of which parishes would contribute to which HRC. (See page 35 of revised SPD). For clarity it would be better if the map showed a different colour for each area because at present it implies that the areas with similar colours are related in some way – same levels of contributions expected or population sizes?

35. The map indicates the location of existing HRCs and currently appears to show Milton HRC. It is suggested that the location points are removed since this highlights the non-central position of some HRCs within their catchments, which could result in challenges to the proposed boundaries of these areas.
36. The new HRCs planned for the Cambridge area and for Northstowe are all included in one group. Northstowe is included, as a District electoral ward, which it is not at present, so should be removed from Table 8.1.
37. Thresholds and different ward requirements
The draft SPD is not clear on the threshold size of development for which the County Council would expect financial contributions towards HRCs. Would a developer with a planning permission for a single dwelling be expected to contribute or would five or ten dwellings be considered a more reasonable threshold?
38. It could be that the levels of contribution required from different wards could vary greatly within South Cambs depending on whether a ward was in a group where a new HRC was planned for or an upgrade of an existing facility. If the capital cost of an upgrade was only a small amount per dwelling it could cost more to administer and collect this contribution as part of a Section 106 than the capital cost asked for. CCC does ask for other infrastructure requirements as part of Section 106 agreements, which have varying thresholds for when they are taken up. Would it therefore be simpler if the threshold for contributions to HRCs kicked in at the same thresholds as these other requirements rather than requiring all development to make a financial contribution?
39. **Consideration of design issues** (MWRECAP 029;030;031;032;033; 046)
South Cambs made a number of representations on the earlier draft SPD since it was felt that the emphasis in the section on Waste Storage Infrastructure was on the functional requirements rather than the design considerations. The Council therefore welcomes the inclusion of an additional general principle to consider the appearance of waste storage compounds – ‘Urban design principles including the local character, place making and local distinctiveness of an area.’
40. The urban designers working at South Cambs have experience of a number of major projects and fringe sites around Cambridge and within the District and have stressed the importance of incorporating better design for waste facilities into new developments and where possible into existing communities. The impact of bins and bin storage facilities along the Streets and within Public Realms cannot be overlooked. Usually, bins and bin storage areas form a part of the 'Public Realm' by being within an existing or proposed streetscene, hence the visual impact of the bin store is key to the quality of any new or existing Streetscape. South Cambs request that appropriate level of design emphasis is included in the SPD on Urban Design principle of 'well integrated street design' in relation to bins storage facilities.
41. A new paragraph should be added in Part 5 Waste Storage Points after 5.1 to read as follows -

'The design of proposed developments should consider the siting and layout of refuse and recycling storage at an early stage. It is important to emphasise that appropriate siting and landscaping should reduce the visual impact of the bin store, to help enhance the overall quality and experience of the streets/development.'

42. Paragraph 6.2 in Part 6 Waste Storage Infrastructure should be amended to read as follows -

'The proposed designs of the bin storage area will need to be considered as part of the development proposals and the proposed design should be justified within the design and access statement submitted as part of the planning application. Where waste storage compounds are to be utilised the developer should make adequate arrangements for their management and maintenance to the satisfaction of the Local Planning Authority.'

43. In Part 7 Waste Collection a new sub-heading should be added after paragraph 7.2 to read as follows-

'Key Aspects of Urban Design

1. Bins, bin storage areas and communal recycling centres form a part of the public realm within an existing or proposed streetscene, therefore integrated and innovative design and siting of bin stores and storage areas should be explored to aid well designed and good quality Public Realms.

2. In order to reduce the visual impact of the store, an appropriately screened or landscaped area should be considered. The proposed design for bin stores and storage areas should be considered within the design proposals for the streetscenes and development as a whole (including communal recycling centres)

3. The design, layout and siting of bin stores or storage areas will be expected to reduce opportunities for crime and anti-social behaviour.'

44. These additions to the SPD will provide an improved balance between the functional requirements of storing and collecting waste and the design aspirations of planners to improve the future visual appearance of all new developments. Achieving both requirements is vital to creating future communities that have a quality environment.

45. South Cambs welcomes the inclusion of case studies within the draft SPD in part 12. The opportunity could be taken to promote better design by having further examples of good practice be included in this section especially to show different ways that new residential developments have been designed to include space for waste bin areas within them. The appearance of a new housing scheme can look cluttered if the residents find it easier to leave their bins in front of their houses rather than them having easy access to a well designed waste bin area. Equally the visual quality of commercial development can be improved if waste disposal areas are carefully designed within a new scheme and case studies of good examples could help planners show how waste can be dealt with.

Implications

46. Financial	Nil
Legal	Nil
Staffing	By responding to the consultation on the SPD the Council will more efficiently use staff time since the SPD will provide guidance on waste issues relating to planning applications.
Risk Management	Nil
Equality and Diversity	Nil

Equality Impact Assessment completed	No but one will have been prepared by Cambridgeshire County and Peterborough City Councils for the draft SPD.
Climate Change	Developers in using the SPD will have to consider how to make it easier for residents and businesses in new proposed developments to dispose of waste. Aim of SPD is to promote waste reduction by increasing recycling which will be good for future environment in South Cambridgeshire .

Consultations

47. Consultations have taken place with all those officers that were involved in making comments on the earlier draft SPD. – Planning; New Communities; Environmental Health; and the Urban Design Team.

Consultation with Children and Young People

48. Not specifically applicable to this consultation.

Effect on Strategic Aims

49. AIM A – We are committed to being a listening Council, providing first class services accessible to all
The Council is responding on behalf of the residents of the district to the consultation. Where the contents of the SPD may impact upon development and therefore affect local communities within South Cambs the Council has indicated where changes should be made to the SPD.
50. AIM B – We are committed to ensuring that South Cambridgeshire continues to be a safe and healthy place for you and your family
By responding to the consultation the Council will ensure that the contents of the SPD maintain South Cambs as being a safe and healthy place for all and that its proposals in future will produce developments that are well designed and consider waste management and promote recycling.
51. AIM C – We are committed to making South Cambridgeshire a place in which residents can feel proud to live
By responding to the consultation the Council will ensure that the contents of the SPD is able to assist in the planning of the district as regards waste.
52. AIM D – We are committed to assisting provision of local jobs for you and your family
The SPD promotes recycling within new developments and the use of well designed waste facilities within the district. Managing waste facilities could provide for local jobs.
53. AIM E – We are committed to providing a voice for rural life
The Council in responding to the consultation will ensure that the SPD considers rural areas and the special needs of such areas as most of the district is rural in character.

Conclusions / Summary

54. The report outlines the Council's main concerns on the latest draft SPD. South Cambs welcomes that many of the issues raised in the previous consultation on the earlier draft of the SPD have been accepted by the Cambridgeshire County and

Peterborough City Councils. However there remain some concerns that need to be addressed and further revisions to be made to the final SPD as set out in this report.

Appendices

Appendix 1 - Report to Joint Planning and New Communities Portfolio Holder meeting on Response to consultation by Cambridgeshire County Council and Peterborough City Council on the two draft supplementary planning documents relating to waste management (2 March 2010)

Appendix 2 – Position Statement on the RECAP Waste Management Design Guide SPD by Cambridgeshire County and Peterborough City Councils (June 2010)

Appendix 3 – Outline of amendments proposed by Cambridgeshire County and Peterborough City Councils' to representations submitted in March 2010 by South Cambs on the draft RECAP Waste Management Design Guide – (September 2011).

Appendix 4 – Extract from revised draft SPD on Household Recycling Centres – What are the catchment areas for HRCs and how to calculate developers contributions (Edited to show those for South Cambs)

Background Papers: the following background papers were used in the preparation of this report:

- Pre- Submission draft of RECAP Waste Management Design Guide SPD (2010)
- Cambridgeshire County and Peterborough City Councils' Minerals and Waste Core Strategy
- RECAP Waste Management Design Guide Draft SPD – Statement of Consultation (Representations and Responses) April 2011.

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SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO:	Planning and New Communities Joint Portfolio Holders	2 March 2010
AUTHOR/S:	Corporate Manager (Planning and Sustainable Communities) / Senior Planning Policy Officer	

**RESPONSE TO CONSULTATION BY CAMBRIDGESHIRE COUNTY COUNCIL AND
PETERBOROUGH CITY COUNCIL ON THE TWO DRAFT SUPPLEMENTARY PLANNING
DOCUMENTS RELATING TO WASTE MANAGEMENT**

Purpose

- 1 The purpose of this report is to agree the Council's response to a consultation currently being carried out by the Cambridgeshire County Council and Peterborough City Council. The consultation is on the two Supplementary Planning Documents
 - The Location and Design of Waste Management Facilities
 - The Recycling in Cambridgeshire and Peterborough Partnership (RECAP) Waste Management Design Guide.
- 2 The consultation is for six weeks from 15 February to 29 March 2010 and is taking place alongside the consultation on the proposed Submission version of the Minerals and Waste Development Plan (MWDP).
- 3 The full consultation can be seen on the County's website.
www.cambridgeshire.gov.uk/environment/planning/mineralswasteplan
- 4 This is a key decision because it is likely to have an impact on the design of all new developments throughout the district.
- 5 It was first published in the December 2009 Forward Plan.

Executive Summary

- 6 This report outlines the Council's response to the consultation on two waste related Supplementary Planning Documents. These SPDs are supporting policies from the draft Minerals and Waste Development Plan, which is currently out for consultation in its proposed Submission stage. South Cambs is concerned that the consultation of these SPDs is premature when the MWDP has yet to be adopted. The Council supports the Location and Design of Waste Management Facilities SPD and welcomes that it gives separate consideration to facilities placed in a rural location. It needs to consider the traffic implications of such rural locations. The impact of new waste facilities on the existing communities in urban fringe and major development sites needs to be highlighted. Concern at how noise and air quality issues are included in the SPD – needs to be revised. The Council has adopted as Council Policy the RECAP Waste Design Guide SPD that is now being consulted upon. Concern that design guide is not as easy to use as it should be to encourage use of it. Toolkit section of SPD needs to be revised so that it is clearer where it is within the

document. Need clear definition of meaning of waste audit. Planning and policy context of SPD needs to be revised to reflect what is within current proposed Submission MWDP. Design element of waste facilities need to be included – not just functional needs of waste facilities.

Background

- 7 Both of the SPDs are linked to the Cambridgeshire and Peterborough Minerals and Waste Plan and support policies contained within this draft plan.

The Location and Design of Waste Management Facilities SPD (draft) –

- 8 This SPD will provide guidance on the location and design of waste management facilities over the Plan period from 2006 to 2026. . It is intended to guide the design and location for the waste management facilities (including Household Recycling Centres) in Cambridgeshire and Peterborough to ensure high quality in relation to layout, access, appearance, environment and the use of materials, and to demonstrate how these facilities can be developed in both urban and rural settings.
- 9 The guidance contained within the SPD relates to policy CS24 in the Minerals and Waste Core Strategy (MWCS) covering the design of sustainable waste management facilities. Currently the Location and Design of Major Waste Management Facilities SPD is linked to the adopted Cambridgeshire and Peterborough Waste Local Plan. According to the County Council this SPD is being consulted upon alongside the MWDP because it needed to be update to avoid a policy vacuum when the MWCS is adopted and supersedes the Waste Local Plan.
- 10 Also the revision has allowed the County Council to amend and update the content of the existing SPD - for example in relation to locating facilities in urban areas. Unlike the previous SPD the updated document has a broader scope, extending beyond 'major' waste management facilities to cover important matters such as the location and design of local community facilities, including Household Recycling Centres. The title of the document has been amended to reflect this difference.
- 11 For more details about the contents of the SPD see Appendix 1

The Recycling in Cambridgeshire and Peterborough Partnership (RECAP) Waste Management Design Guide. SPD (draft)

- 12 This SPD will provide guidance in relation to the design of waste management facilities as part of residential and commercial developments and the requirements for expanded and/or additional household waste management infrastructure.
- 13 The purpose of the SPD is to set out a series of development principles and design practice and it is intended to be used by:
- Developers and designers to ensure effective segregation, storage and collection of waste materials; and
 - Planning Authorities in assessing planning applications to ensure that waste management needs for both residential and commercial developments are adequately addressed and secured.

- 14 The guidance contained within the SPD relates to policies CS16 covering the provision of Household Recycling Centres and C28 covering Waste Minimisation, Re-use, and Resource Recovery.
- 15 The Recycling Cambridgeshire and Peterborough Partnership (RECAP) Design Guide was originally prepared by consultants Wisser Environment (an Environmental Consultancy) on behalf of the partnership and was subsequently published in 2008. South Cambridgeshire District Council adopted this earlier version as Council Policy in March 2008 pending its adoption as a SPD – the process that is now taking place as it is out for consultation alongside the MWDP.
- 16 The content of the Guide has been reviewed since 2008 to take account of the policies of the MWDP and to take into account more recent developments e.g. current national planning policy. The SPD supplements the policies of the MWDP with design standards and expands upon the requirements needed to provide additional waste management infrastructure in a sustainable way.
- 17 The focus of the RECAP Design Guide is the waste management facilities, which are to be provided as part of residential and commercial developments allowing for the segregation of waste for recycling and composting. For more details about the contents of the SPD see Appendix 1

Issues for consideration

- 18 *Premature consultation*
South Cambridgeshire District Council is concerned that the two SPDs are being consulted upon prematurely before the MWCS has been adopted. It would appear that the intention of the County Council is that the SPDs will be formally adopted once the Core Strategy of the MWDP is adopted in July 2011. Both SPDs are supporting policies that are contained within the proposed Submission version of the MWCS. These policies could be amended as a result of the current consultation process and any subsequent public inquiry may revise the contents of the MWDP. The SPDs would then have to be subject to further consultation if the supporting policies in the MWDP are changed. This could produce a very confused process with different versions of the SPDs being used by local planning authorities.
- 19 South Cambs has made detailed comments about the contents of both SPDs and these have been included in Appendices 2 and 3 of this report. The SPDs are considered in turn in this report and the main points that the Council wishes to make are outlined below.

1) The Location and Design of Waste Management Facilities SPD (draft)

- 20 South Cambs welcomes the detailed guidance produced in this SPD and welcomes that rural locations have been considered separately thereby recognising the different considerations that must be given to locating waste management facilities in countryside settings such as is found in much of South Cambridgeshire. Also that separate consideration is given to urban fringe sites and major development sites of which South Cambs has within its boundaries.
- 21 There needs to be recognition within the SPD that South Cambs has a number of adopted planning policy documents in the Local Development Framework. For planning applications for waste management facilities within this district there are a number of relevant Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) that would need to be considered.

- 22 In the principles to apply for rural locations one must be added that considers the traffic generated by a waste facility particularly heavy commercial vehicles (HCV) so that there is not an increase in unsuitable traffic on rural road through rural settlements. The criteria is applied to both urban and urban fringe locations but is equally as valid in rural areas if traffic ends up going through nearby villages.
- 23 There also needs to be consideration of impact that locating a waste management facility will have on the existing local communities in urban fringe and major development sites. The needs of these communities must be taken into account in planning these facilities.
- 24 The SPD promotes the idea of the co-location of related waste facilities which although may have significant benefits, would obviously result in a much larger of scale development. This would be potentially more intrusive on the environment thereby reducing those sites that could be considered suitable.
- 25 Waste Management sites have potential to cause significant and complex noise impact. South Cambs has concerns about how noise is addressed in the SPD. In the section considering noise (page 36) reference is made to a *noise reportand appropriate mitigation measures.....* but does not detail that the main purpose is to assess noise impact locally, characterise the existing noise climate at noise sensitive premises and use the best practical means to mitigate any adverse noise as necessary. This must be included in this section to safeguard amenity and minimise noise disturbance from any future facilities.
- 26 Also in the SPD reference is made to guidance against World Health Organisation Community Noise Guidelines and actual dB levels are quoted e.g. 55dB day 45 night and or no more than 5 to 10 dB increase in background. These actual dB noise levels should be used with caution as these levels can be misleading and understate impact. South Cambs requests that any reference to actual dB noise levels should be removed and simply state that noise will be assessed on a site by site basis on its merits having regard to local circumstances. It would be simpler within the SPD to refer to assessment in accordance with PPG 24 methodology and recommended noise guidance in WHO and best practice such as British Standards.
- 27 The SPD considers the air quality of waste facilities but narrows this consideration to the impact arising from traffic. There should also be included the air quality issues arising from the on-site operations of the facility.

2) The Recycling in Cambridgeshire and Peterborough Partnership (RECAP) Waste Management Design Guide SPD (draft)

- 28 Whilst recognising that this document has been in existence for a while it does not appear to have been reviewed thoroughly before it has been approved for consultation as a draft SPD. An SPD cannot create new policies but must support policies in an adopted Development Plan Document and it is not clearly stated within the SPD which policies the SPD is providing guidance to. The structure of the SPD must be revised so that this fundamental fact is made clear at the beginning of the document.
- 29 The SPD states that one of the purposes of the document is to be ‘ a strategic tool for use for Planning Authorities when assessing development applications.’ An SPD cannot have this strategic role – it can only provide guidance for local planning

authorities when they are considering planning applications, supporting policies in a Development Plan Document.

- 30 Mention is made in the SPD of the need for a 'waste audit' to be carried out by a developer of a development proposal but there is no definition of this term or what it may include. This must be included in the SPD to assist both developers and local planners.
- 31 If this is to be used by planners and developers the SPD as a design guide must be easy to use and the SPD as drafted needs to be revised so that it is clearer what the planners should ask for from developers submitting planning applications e.g. if a waste audit is required and what developers should provide when submitting a planning application. It is unclear whether a developer would be expected to produce both a waste audit and to complete the Toolkit included in the SPD.
- 32 If it is expected that a 'Toolkit' be filled out for each planning application submitted by a developer then consideration needs to be given as to the format of the SPD and where the Toolkit is placed within the document. Consideration should be given to making the Toolkit section of the SPD as a clearly identifiable part. Suggestions to achieve this include putting it at the end of the SPD with a different coloured background or font to make it easily seen. As a paper document the SPD could have a pocket in the cover in which the Toolkit is placed so that it can be accessible. An electronic version of the SPD could have the Toolkit as a separately accessible document, which could either be downloaded as a Word document or printed off so that it can be filled in and submitted with a planning application.
- 33 The earlier version of the Waste Design Guide was adopted by South Cambs as Council Policy in March 2008 and planners have referred developers to the guide before they submit planning applications to the Council. South Cambs encourages pre-applications discussions with developers. There is no indication in the current SPD or in the accompanying report, which was prepared by County planners in September 2009 of the success of the guide, and details of which other local planning authorities within Cambridgeshire had adopted it as Council Policy. It would be useful to know what success there was been in improving the waste management content of planning applications as a result of the existence of the guide. The toolkit appears to be a useful way of assessing the waste needs of a development but are developers submitting these with their applications?
- 34 The chapter setting the planning and policy context of the SPD refers to documents but does not make it clear who has published these and the relevance of their content. The section on the Minerals and Waste Development Plan is particularly weak and does not appear to reflect that the MWDP is at the proposed Submission stage, being out for consultation at the same time as this SPD. This must be amended and further highlight the difficulties of consulting on this SPD when the MWDP is not yet adopted.
- 35 Part 3 on 'Waste Management in Context' needs to mention the fact that Cambridgeshire comes within the area identified by Central Government as an area where there will be a step change in growth and that this is planned for in the East of England Plan up to 2021 and beyond. It is not just the popularity of the area that has led to an increase in its population but it has been specifically identified as a growth area where there will be a planned step increase in house building.
- 36 The SPD in considering the practical needs of how to assist a developer in planning for waste management in residential and commercial developments is welcomed by

South Cambs. It will assist planners to recognise the need to consider waste within proposed developments. However the emphasis seems to be upon the technical/ functional specifications needed for waste facilities at the expense of considering the aesthetic design of such facilities to fit into their surroundings. This should be addressed in the SPD.

- 37 The SPD should highlight to developers that there will be financial implications relating to the provision of waste management infrastructure. These will vary according to the nature and scale of the proposed development and associated supporting infrastructure and will be based on any additional costs likely to be incurred by the local authority arising out of the proposed development.
- 38 The Council is concerned at the lack of information within the Design Guide to justify the request for contributions to household recycling centres. Planning obligations cannot be used to ask developers to simply provide contributions to extra sites. There are five tests that have to be satisfied to allow obligations to be sought.

1. Relevant to planning;
2. Necessary to make the proposed development acceptable in planning terms;
3. Directly related to the proposed development;
4. Fairly and reasonably related in scale and kind to the proposed development; and
5. Reasonable in all other respects.

- 39 In the MWDP Core Strategy in Policy CS16 it states that ‘...New housing development will contribute to the provision of household recycling centres. Contributions will be consistent with RECAP Waste Guide....’. South Cambs is concerned that the DPD cannot require such contributions from planning obligations and as drafted the SPD does not contain sufficient information about this matter to provide guidance to developers.

Implications

1.	Financial	Nil
	Legal	Nil
	Staffing	By responding to the consultation on the SPDs the Council will more efficiently use of staff time since the SPDs will provide guidance on waste issues relating to planning applications.
	Risk Management	Nil
	Equal Opportunities	Nil

Consultations

- 40 In preparing this report consultations have taken place with officers in Environmental Health; New Communities and the Urban design team.

Effect on Strategic Aims

2.	Commitment to being a listening council, providing first class services accessible to all. The Council is responding on behalf of the residents of the district to the consultation. Where the contents of the SPDs may impact upon development and therefore affect local communities within South Cambs the Council has indicated where changes should be made to the SPDs
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<p>Commitment to ensuring that South Cambridgeshire continues to be a safe and healthy place for all.</p> <p>By responding to the consultation the Council will ensure that the contents of the SPDs maintain S Cambs as being a safe and healthy place for all and that its proposals in future will produce better designed developments within the district.</p>
<p>Commitment to making South Cambridgeshire a place in which residents can feel proud to live.</p> <p>By responding to the consultation the Council will ensure that the contents of the two SPDs are able to assist in the planning of the district as regards waste and will ensure that good design is fundamental to this planning.</p>
<p>Commitment to assisting provision for local jobs for all.</p> <p>The two SPDs are promoting good design for waste in new developments and for well-designed waste facilities within the district. These developments could provide for local jobs.</p>
<p>Commitment to providing a voice for rural life.</p> <p>The Council in responding to the consultation will ensure that the SPDs consider rural areas and the special needs of such areas as most of the district is rural in character. .</p>

Conclusions/Summary

- 41 The report outlines the Council comments on the two SPDs being consulted upon. South Cambs is concerned that the consultation is premature given that the MWDP that these SPDs are supporting has not yet been adopted and therefore may change. Notwithstanding this the Council has made comments on the content of both SPDs and these are outlined in the report.

Recommendations

- 42 The Portfolio holders for Planning and New Communities are recommended to agree the responses to the consultation on the two SPDs as contained within the report and in Appendix 2 for The Location and Design of Waste Management Facilities SPD and Appendix 3 for RECAP Waste Management Design Guide SPD.

Background Papers: the following background papers were used in the preparation of this report:

The Location and Design of Waste Management Facilities SPD (Consultation draft 2010)

The Recycling in Cambridgeshire and Peterborough Partnership (RECAP) Waste Management Design Guide SPD. (Consultation draft 2010)

Report to Cabinet on 13 March 2008 on RECAP Waste Design Guide

Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (Pre Submission 2010)

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Appendix 1

Details of the contents of each of the SPDs being consulted upon.

The Location and Design of Waste Management Facilities SPD (draft)

The Draft SPD provides advice on location and design of waste management facilities. In terms of location the SPD includes advice on:

- Previously Developed land – where possible facilities should be developed on previously developed land, enabling positive re-use and avoiding the need to develop Greenfield land.
- Siting – this will be dependent on the type of facility and processes that will influence the size and the location of any building. However, it should take account of the primary road network and access arrangements, environmentally sensitive locations and whether it is situated within an urban or rural location, or within a new housing development site.
- Co-location of Facilities – may offer significant benefits in reducing the need for transport of waste and the treated product. Bringing more than one facility together can maximise the amount of resource recovery that can take place and provides a more sustainable solution.
- Co-location with Household Recycling Centres – provides guidance on the co-location of waste facilities to provide transport benefits and higher efficiency of separation and recycling.
- Temporary Facilities – major construction sites or development areas should provide temporary waste management facilities to separate and recycle construction and demolition waste. The on-site facilities would encourage re-use of recycled material and also minimise the transport of waste materials from site and reduce the need for importation of new materials, thereby reducing the overall impact on the surrounding road network.

In terms of design the SPD includes advice on:

- Character – the design of waste management facilities should be specific to the design brief and the context, based on an understanding of the way the local area looks and works, forming part of a strong design process.
- Built Form – this will largely depend on whether the facility is within an urban or rural location. For example, in rural locations it would be appropriate to follow a form reflecting agricultural buildings, although more imaginative schemes should also be considered. In urban settings there is more opportunity for an imaginative bold design approach.
- Local Distinctiveness – all proposals should address local distinctiveness rather than creating anonymous proposals and, where appropriate, can be imaginative in their design.
- Transport, Access, Parking and Circulation – these points should be integral to the design of the site, and access for all users should be considered. Access should be clear and safe, and the site layout should allow the early separation of cars and pedestrians/cyclist from HCVs.
- Lighting – the nature of the facility may mean that some working during the hours of darkness is inevitable. Lighting must be considered as an integral part of the design

to meet health and safety requirements and ensure that lighting equipment minimises the spread of light, particularly on sensitive receptors.

- Landscape and Boundary Treatments – the landscape proposals should make use of existing features, protect existing habitats and features of value, and help assimilate the project into its surroundings. With effective boundaries and screening, the external site activities become less visually sensitive.
- Noise – mitigation will comprise sensitive location and sympathetic design as well as best practical means to control noise (noise abatement measures). For example, locating facilities within buildings allows much greater control over noise effects.
- Air Quality – potential effects from dust, odour and emissions from traffic need to be considered. A number of systems are available to minimise problems and should be considered as part of the design.
- Water – all schemes should include measures to ensure water quality and the efficient use of water.
- Pest Control – all developers are advised to include measures in their schemes to deal with pests. Locating the proposals inside buildings allows a high degree of control against vermin, including rodents and birds.
- Security – facilities should be designed to be secure, but not to appear like fortresses. Security should be considered for each of the design elements, whether building construction, boundary treatments or landscape design. The principles in ‘Secure by Design’ should be followed.
- Energy Efficiency and Sustainable Construction – there are many opportunities for more sustainable methods of construction, which should be incorporated into the development proposals. One of the most important issues is to establish adaptable long-term facilities that can function over a long period of time.

Much of the advice can be applied to all types of waste management facility. However, Facility Profiles are also included within the SPD that provide additional advice specific to the different types of facilities.

The Recycling in Cambridgeshire and Peterborough Partnership (RECAP) Waste Management Design Guide SPD (Draft)

The Draft SPD provides advice on the design and provision of waste management infrastructure as part of residential and commercial developments. In terms of waste management design the SPD includes advice on:

- Internal storage capacity: including a requirement to provide between 35-40 litres of space within the kitchens of new homes to give residents sufficient space to allow for recycling and composting (as appropriate).
- External storage capacity: the Guide sets out recommendations for amount of space which is required to store bins for different types of waste to serve residential and commercial developments including different standards for communal bins in relation to flats/apartments. In the case of commercial development the amount of space required is dependant upon the use of the land e.g. requirements for restaurants and fast food outlets are greater. For residential development it is dependant upon whether it is a house or the number of rooms in the case of flats/apartments (excluding kitchens and bathrooms). For example a single house would need to provide 775 litres with a one bedroom flat with a living room in a 4 floor development would provide 320 litres.

- Location of Waste Storage: issues which should be considered in relation to location of bins including ensuring that they are accessible for both users and collection crews and that the amenity of residents is protected.
- Waste Storage Infrastructure: sets out a minimum specification for compounds to store residential and commercial waste above-ground and guidance in relation to the design of underground facilities.
- Highway Design: requirements for the design of new roads given the emphasis away from car dominated environments in urban design to take into account the need for waste collection vehicles to serve new developments effectively.
- Additional waste management measures: identifies a range of complementary measures, which can be introduced to support the effective management of waste e.g. educational schemes.

In terms of implementation the SPD includes advice on:

- Household Recycling Centres: These facilities enable residents to bring and deposit bulky wastes and other waste types not normally collected by the County Council and Peterborough City Council. Given the significant amount of future development planned within Cambridgeshire and Peterborough there will be a need to expand the existing network of 11 Recycling Centres (1 of which is in the Peterborough City area). The Guide sets out a requirement for developers to contribute to the existing network of centres by providing financial contributions and in some cases land to upgrade existing centres or provide new Recycling Centres in the case of strategic developments e.g. Northstowe.
- Bring Sites: These sites are generally located within publicly accessible areas - e.g. public car park and comprise a number of separate containers allowing for the separate collection of materials for recycling. The Guide provides guidance on suitable locations for additional Bring Sites to avoid the disturbance of residents and ensure the effective collection of recyclables. Developers are to be required to assess the impact of their proposals on the existing network of 380 Bring sites within Cambridgeshire and Peterborough. Following this assessment developers will be required to provide additional Bring Sites, upgrade existing sites in the locality or provide a financial contribution as appropriate. In relation to new sites it is important to note that Guide includes an assumption that at most there will be one Bring site per 800 households.

The Guide also includes a toolkit to be used by developers to set out how they have addressed waste management requirements set out above as part of their planning application.

Much of the advice in the Guide can be applied to both residential and commercial facilities. However the SPD focuses largely on residential development reflecting the responsibilities of the Cambridgeshire and Peterborough Authorities relating to the collection and disposal of municipal waste. It is important to emphasise that commercial developments will not be expected to contribute to additional facilities for the collection of municipal waste.

The SPD makes it clear that the development of new facilities must address the challenges of climate change. It takes account of the supplement to PPS1 on Climate Change published in December 2007 and refers to relevant principles relating to waste management facilities.

**RECAP (Cambridgeshire & Peterborough Waste Partnership)
Waste Management Design Guide - Position Statement**

**(For the Cambridgeshire and Peterborough Minerals and
Waste Core Strategy Examination)**

June 2010

1.0 Introduction

- 1.1 This statement has been prepared by Cambridgeshire County Council and Peterborough City Council in response to representations made by South Cambridgeshire District Council relating to policies CS16 and CS28 of the Minerals and Waste Core Strategy and related supporting text (representation numbers MWCSP23, MWCSP28 and MWCSP282).
- 1.2 The purpose of this paper is to clarify how these representations are being taken forward by the RECAP (Cambridgeshire and Peterborough Waste) Partnership and the Authorities.

2.0 Preparation of the RECAP Waste Management Design Guide

- 2.1 The RECAP Waste Management Design Guide together with the other parts of the Cambridgeshire and Peterborough Minerals and Waste Local Development Framework was subject to public consultation from 15th February to 29th March 2010.
- 2.2 The purpose of consulting upon the RECAP Waste Management Design Guide at the same time as the Core Strategy was to demonstrate how the relevant Core Strategy policies would be implemented and to avoid a potential “policy vacuum” following the adoption of the Core Strategy.
- 2.3 It is however accepted that any changes to the content of the Minerals and Waste Core Strategy policies CS16 and CS28 will need to be taken into account prior to adoption of the RECAP Waste Management Design Guide.
- 2.4 Following the consultation, a meeting was held with officers from South Cambridgeshire District Council in June 2010 to discuss the representations received.

3.0 Policy CS16 – Household Recycling Centres

- 3.1 Policy CS16 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy states:

A network of household recycling facilities easily accessible to local communities will be developed through the Site Specific Proposals Plan. New household recycling centres will be in the following broad locations:

- *Cambridge East*
- *Cambridge North*
- *Cambridge South*
- *March*
- *Northstowe*

- *Peterborough*

New development will contribute to the provision of household recycling centres. Contributions will be consistent with the RECAP Waste Management Design Guide and additionally the Planning Obligations Implementation Scheme.

- 3.2 South Cambridgeshire District Council has made a representation in relation to policy CS16 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (representation number MWCSP28) which states that:

“Policy CS16 Household Recycling Centre states that ‘New developments will contribute to the provision of HRCs. Contributions will be consistent with RECAP Design Management Guide SPD.’ The Council is concerned that this contribution is included in a policy since the provision of HRC is the responsibility of the County Council under the Refuse Disposal (Amenity) Act 1978 and the MWDP has made provision for 9 additional HRCs to meet future demands. Planning obligations could not be used to provide for additional sites if more growth is planned for through the Review of the East of England Plan. The MWDP would need to be reviewed to take into account this planned growth. It could have major implications for the whole waste strategy and as such should be appropriately planned for.

Amend the wording of Policy CS16 so that it does not state that all new developments will have to contribute to HRCs”.

- 3.3 In responding to the RECAP Waste Management Design Guide consultation the District Council has also stated that they “are concerned at the lack of information within the Design Guide to justify the request for contributions to household recycling centres”. The District Council referred to the five tests which planning obligations are required to satisfy as set out in Circular 05/05.

Current position in response to representations to CS16

- 3.4 If new development takes place and this gives rise to the need for new Household Recycling Centre or improvements the development should contribute to any new HRC provision which is directly related to it. It is this principle which is incorporated into Policy CS16 of the Core Strategy and it should be retained. The Authorities will of course keep the Plan under review and revise the Plan if necessary.
- 3.5 It is correct that the Authorities as Waste Disposal Authorities have the duty to provide facilities, however, where new provision is directly related to development they can seek contributions to meet this need through the provisions set out in ODPM Circular 05/05: Planning Obligations.

- 3.6 The RECAP Waste Management Design Guide (paragraph 8.9) states that: “developers...will be expected to contribute finances in accordance with Circular 05/05 proportionate to the development”

“At strategic locations developers will be required to provide land and/or provide:

- Finance for upgrading existing Household Recycling Centres
- Finance for new Household Recycling Centres”

- 3.7 As currently drafted the RECAP Waste Management Design Guide makes a distinction between financial contributions being sought for new household recycling centres as opposed to upgrading existing Household Recycling Centres. It also highlights the need for developers to make land available at strategic locations – those allocations referred to in policy CS16.

- 3.8 The RECAP Waste Management Design Guide (paragraph 8.10) states that:

“In Peterborough financial contributions will be consistent with the Planning Obligations Implementation Scheme”

“In Cambridgeshire financial contributions will be calculated on a per dwelling basis”

- 3.9 The wording in policy CS16 and the guidance in the RECAP Waste Management Design Guide is therefore consistent.

- 3.10 The requirement for developer contributions outlined in the draft RECAP Waste Management Design Guide for the provision of Household Recycling Centres is proportionate to the scale of development proposed and as such it is consistent with the requirements of ODPM Circular 05/05.

- 3.11 It is proposed that in order to ensure that the developer contributions for additional Household Recycling Centres and/or improvements being sought are directly related to proposed developments, further revisions will be made to the RECAP Waste Management Design Guide.

- 3.12 To inform these revisions further work is currently been undertaken by Cambridgeshire County Council. The following matters are being considered:

- the cost of additional Household Recycling Centre infrastructure and the extent of contributions which will be sought from new development.
- the identification of geographic areas within the County which will be served by individual Household Recycling Centres based upon driving distance and an assessment of the road network.

- the mechanism which will be used to define the cost per dwelling (for new development) towards the provision of additional Household Recycling Centres or improvements to existing centres.

3.13 The revisions to the Guide will provide the necessary clarity on the contributions that will be sought.

4.0 Policy CS28 – Waste Minimisation, Resource Use and Recovery

4.1 Policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy states:

The Waste Planning Authorities will encourage waste minimisation, re-use and resource recovery by requiring:

- *a waste management audit and strategy to put in place practicable measures to maximise waste minimisation, sorting, re-use, recovery and recycling of waste on all developments over the value of £300,000*
- *submission of a completed RECAP Waste Management Design Guide Toolkit Assessment*
- *new development to contribute to the provision of bring sites. Contributions will be consistent with the RECAP Waste Management Design Guide and additionally the Planning Obligations Implementation Scheme.*
- *temporary waste recycling facilities in strategic development areas including the Cambridge and Peterborough development areas, Northstowe and St Neots. These should maximise the reuse, recycling and recovery of inert waste streams from construction and demolition operations, and be in place throughout the construction phases of these major development areas.*

4.2 South Cambridgeshire District Council has made a representation in relation to paragraph 10.4 which forms part of the supporting text of policy CS28 of this policy in the Minerals and Waste Core Strategy (representation nos. MWCSP23 and MWCSP282) which states that:

“Policy CS28 Waste Minimisation, Re-use and Resource Recovery is about how the Waste Planning Authority will encourage waste reduction, recycling and resource recovery in new developments across the plan area. It is a fundamental one to achieving improvements in the management of waste in future residential and commercial developments. Much emphasis is placed upon the RECAP Waste Management Design Supplementary Planning Document, which is out for consultation alongside the proposed Submission MWDP. The success in achieving the requirements of CS28 will rest on the contents of this SPD and how clearly it outlines the requirements for waste management with future developments. South Cambs is concerned that the contents of the SPD are not robust enough to achieve this.

South Cambs is concerned that the contents of the SPD are not robust enough to achieve the requirements of Policy CS28. The SPD cannot create policy and therefore clear guidelines must be included in the supporting text to inform the content of the SPD”

4.3 Concerns have been expressed by a number of other organisations including South Cambridgeshire District Council in relation to the content of the RECAP Waste Management Design Guide as follows:

- the presentation, applicability and structure of the RECAP Waste Management Toolkit.
- design guidance relating to the provision of waste storage, waste collection and Bring Sites.
- the process for securing developer contributions for the provision of Bring Sites.

Current position in response to representations to CS28

4.4 Policy CS28 requires developers to complete the RECAP Waste Management Design Guide toolkit to explain how provision for waste collection and recycling will be made within residential and commercial developments in Cambridgeshire and Peterborough.

4.5 The toolkit includes reference to:

Design Criteria: Developers to demonstrate that they have taken account of the guide in relation to the space required for waste storage, highway design and developer contributions.

Assessment Criteria: More detailed information to be provided where waste storage compounds, Bring sites or any alternative schemes are proposed.

Basis for conditions and/or agreements: The range of developer contributions which will be sought for the provision of waste storage containers, Bring Sites and Household Recycling Centres

4.6 The intention is that revisions will be made to the content of the Guide to address those issues raised by South Cambridgeshire District Council and others, which are summarised in paragraph 4.2. This will address the following:

- amending the Waste Management Design Guide Toolkit so that the requirements for new residential and commercial developments can be more clearly understood by developers, planning officers and other stakeholders.
- amending the Guide to give greater emphasis to the key messages including the standard for Bring site provision within residential developments.

- amending the Guide to give greater emphasis to the requirement to prepare waste management strategy and audits including how these can be used to inform the level of developer contributions for the provision of Bring Sites
- restructuring the content of the Guide to make the RECAP Waste Management Toolkit more prominent.

5.0 Next stages for RECAP Waste Management Design Guide

- 5.1 The intention was that the RECAP Waste Management Design Guide would be adopted in June 2011.
- 5.2 However, representations on the Minerals and Waste Plan and the RECAP Guide have highlighted the need to make amendments. These amendments will set how developer contributions will be sought in the Cambridgeshire area for the provision of additional Household Recycling Centres or improvements to existing Household Recycling Centres. This will ensure that there is a robust and transparent foundation for seeking contributions for new or improved Household Recycling Centres.
- 5.3 As the amendments constitute a fundamental revision to the SPD the Authorities expect to seek member agreement for a further round of public consultation on a revised version of the RECAP Design Guide. This will take place in 2011 following the publication of the Inspector's report relating to the Core Strategy which will also be taken into account.

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RESPONSES TO REPRESENTATIONS SUBMITTED ON THE RECAP WASTE MANAGEMENT DESIGN GUIDE – SEPTEMBER 2011.

First column - The SPD being referred to is that consulted upon in the Pre-Submission consultation 2010.

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
Introduction (paragraph 1.2)	002	Concerned that the SPD is being consulted upon prematurely before the Minerals and Waste Core Strategy has been adopted		<p>Disagree - The purpose of consulting upon the RECAP Waste Management Design Guide at the same time as the Core Strategy was to demonstrate how the relevant Core Strategy policies would be implemented and to avoid a potential "policy vacuum" following the adoption of the Core Strategy.</p> <p>It is however accepted that the changes to the content of the Minerals and Waste Core Strategy policies CS16 and CS28 as set out in the Inspector's Report will need to be taken into account prior to adoption of the RECAP Waste Management Design Guide and the document will go out for further consultation following the adoption of the Core Strategy.</p>	<p>No amendments required in relation to early consultation. However, changes to the timescales for adoption will need updating within the text. Delete current paragraph text and replace with following:</p> <p><u>The intention is the adoption of the parent Minerals and Waste Core Strategy will take place and following further public consultation this Waste Management Design Guide will be adopted by Cambridgeshire County Council and Peterborough City Council as a Supplementary Planning Document (SPD). It is anticipated the Core Strategy will be adopted in mid 2011 and this document will be adopted as SPD in early 2012.</u></p> <p>Please see response to MWRECAP51.</p>	This objection has been overtaken by events since the Minerals and Waste Core Strategy has now been adopted and amendments to the SPD have been made in this consultation.
Cross referencing within SPD.	003	Cross referencing – Within the SPD there are many cross references which would be clearer to understand if a page number and /or a paragraph number was included so it was easier to find your way around the document.	Cross-referencing should refer to the relevant paragraph number / page number to make using the document more user friendly.	Agree – this is a sensible suggestion.	Please see responses to MWRECAP 10, MWRECAP 12, MWRECAP 15 and MWRECAP87.	Welcome the inclusion of cross-referencing to the revised SPD.
Introduction (paragraph 1.3)	004	Whilst recognising that this document has been in existence for a while it does not appear to have been reviewed thoroughly before it has been approved for consultation as a draft SPD. An SPD cannot create new policies but must support policies in an adopted Development Plan Document and it is not clearly stated within the SPD which		<p>It is agreed it is not for the SPD to make policy, which is why it is linked to policies CS16 and CS28 in the Minerals and Waste Core Strategy DPD.</p> <p>To date South Cambridgeshire District Council is the only Local Planning Authority, which has</p>	No amendments required.	Disappointed that consideration was not taken on how developers and planning officers had found using the earlier version of the SPD and whether it had resulted in waste and recycling issues being better included within planning applications. It is

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
		<p>policies the SPD is providing guidance to. The structure of the SPD must be revised so that this fundamental fact is made clear at the beginning of the document.</p> <p>The earlier version of the Waste Design Guide was adopted by South Cambs as Council Policy in March 2008 and planners have referred developers to the guide before they submit planning applications to the Council. South Cambs encourages pre- applications discussions with developers. There is no indication in the current SPD or in the accompanying report, which was prepared by County planners in September 2009 of the success of the guide, and details of which other local planning authorities within Cambridgeshire had adopted it as Council Policy. It would be useful to know what success there was been in improving the waste management content of planning applications as a result of the existence of the guide. The toolkit appears to be a useful way of assessing the waste needs of a development but are developers submitting these with their applications?</p>		adopted the 2008 version of the RECAP Waste Management Design Guide as Council policy. Therefore the intention is that bringing forward the RECAP Waste Management Design Guide as a SPD linked to the Minerals and Waste Development Plan is to ensure that waste management collection, storage and recycling form part of new residential and commercial developments within Cambridgeshire and Peterborough		<p>hoped that this additional consultation will allow for such practical revisions.</p> <p>The experience in South Cambs is the toolkit is rarely used by developers and that planning officers would welcome more practical workshops in how to use the guide once it is adopted by the County Council.</p>
Executive Summary 1. Key point 1	005	Only refers to funding and provision of appropriate containers and without any justification	The draft SPD should make clear that as a general principle developers would be expected to contribute towards any additional costs incurred by the local authority arising out of residential developments.	Agree (in part) – Reference is made to a requirement to provide adequate space for the storage of waste (including within commercial premises) and appropriate containers for residential developments. However, it is accepted that the text could be amended to provide greater clarity in relation to the guidance outlined in the Design Guide.	Amend the second sentence in point 1 as follows (text underlined): “In both cases, developers will also have to fund and provide appropriate containers <u>for residential developments where additional costs will be incurred by the Waste Collection Authority</u> ”. For commercial developments...based on consultation with <u>the relevant Waste Collection Authority</u> ”.	Welcome the clarification.
Executive summary – paragraph 11 Key point 7	005	Within this section mention is made to Circular 05/2005 – This should read ‘ in accordance with Planning Obligations Circular 05/2005...’ And all other	Mention of Circular 05/2005 should read as ‘in accordance with Planning Obligations Circular 05/2005...’	Agree – this is a sensible suggestion and would provide greater clarity.	Amend the existing wording in point 7 as follows (text underlined): “A network of Household	Welcome the revision in wording and the additional consideration of CIL where appropriate.

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
		<p>references to this circular in the SPD should be displayed as such.</p>			<p>Recycling Centres is operational across the Cambridgeshire and Peterborough area. Continued development will put pressure on the existing facilities and require the expansion of the network. Financial contributions will be required in accordance with <u>Planning Obligations Circular 05/05</u>...as appropriate”, which will take CIL into account.</p> <p>Amend the existing wording in point 8 as follows (text underlined): “Developers will be required to provide additional Bring Sites, upgrade existing facilities in the locality in accordance with <u>Planning Obligations Circular 05/05</u>...or upgrade (note also amended to take account of CIL).</p> <p>Amend the existing wording in paragraph 8.9 as follows (text underlined): “Although developers will not be expected to construct Household Recycling Centres, they will be expected to contribute finances in accordance with <u>Planning Obligations Circular 05/05</u>...included (note also amended to take account of CIL).”</p> <p>Other references to Circular 05/05 to be amended (as per the wording above and to take account of CIL) in the following areas: Paragraph 4.8 (External Storage Capacity); Paragraph 9.7 (Provision of Bring Sites in Future Developments); Glossary; and Bibliography.</p>	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
Introduction 1.1	006	A specific objective of the SPD must be to assist in achieving policies set out in the MWDP. The SPD can only provide guidance – it cannot create new policies. This must be stated clearly in this introduction. Whilst recognising that the design guide was published in a different format some while ago it must now as an SPD be primarily supporting policies in the MWDP. The review of the guide should not just be considering whether it is consistent with the MWDP but how it supports policies in the MWDP.	Reword the introduction to emphasis that the SPD is supporting policies in the MWDP.	Agree – please see response to MWRECAP9.	Please see proposed amendment relating to paragraph 1.6 (MWRECAP9).	Amendment clarifies the role of the SPD and is to be welcomed.
Purpose of the Guide 1.4.2	007	A SPD cannot be a strategic tool. It can only provide guidance/ support to adopted policies in the MWDP. The word ‘ development application’ would be clearer if it were referred to as a planning application	Remove the words ‘ a strategic tool’ from the second purpose of the guide and replace with the words ‘ guidance’. Replace the word ‘ development ‘ with ‘ planning ‘.	Agree – it is accepted that there is a need for greater clarity in relation to the status of the RECAP Waste Management Design Guide.	Amend the existing wording in paragraph 1.4 (point 2) as follows (text underlined): “Provide <u>guidance</u> for use by Local <u>Planning Authorities</u> when assessing <u>relevant planning applications</u> ”	Welcome revision to wording to clarify the role of the SPD.
1.4.4	007	It must be recognised that for different scales of development there will be varying levels of contributions required. A developer should be able to pick up the SPD and have a clear idea of what contributions are expected.	There must be information in the SPD so that it is clearly set out when developers will be expected to contribute. The draft SPD should make clear that as a general principle developers will be expected to contribute towards any additional costs incurred by the local authority arising out of residential developments.	Agree – it is accepted that there is a need to clarify that costs will be dependant upon the scale of development and that the RECAP Waste Management Design Guide outlines how these costs will be established. Please also see responses to MWRECAP36, 37, 40, 41 and 42.	Amend the existing wording in paragraph 1.4 (point 4) as follows (text underlined): Expand upon the requirements set out in <u>policies CS16 and CS28</u> of the Minerals and Waste Core Strategy for developer <u>contributions</u> relating to the funding and provision of waste management infrastructure.	Additional information has been included in this latest draft of the SPD that cover some of the concerns South Cambs had expressed in the last consultation. This is welcomed. See main report for further details.
1.4.5	007	The wording of this purpose seems to imply that it is possible for the SPD to provide detailed information for developers about financial implications of providing for waste facilities. This needs to be reworded	Amend 1.4.5 along the lines of...’ Highlight to developers that there will be financial implications relating to the provision of waste management infrastructure. These will vary according to the nature and scale of the proposed development and associated supporting infrastructure and will be based on any additional costs likely to be incurred by the local authority arising out of the proposed	Agree – it is accepted that there is a need to clarify that costs will be dependant upon the scale of development and that the RECAP Waste Management Design Guide outlines how these costs will be established. Please also see responses to MWRECAP36, 37, 40, 41 and 42.	Amend the existing wording in paragraph 1.4 (point 5) as follows (text underlined): “Highlight <u>to developers that there will be financial implications relating to the provision of waste management infrastructure.</u> <u>This will vary according to the nature and scale of proposed development and will be based</u>	The words that South Cambs had suggested for inclusion in paragraph 1.4 have been used with some minor amendments. This is welcomed.

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
			development.'		<u>on any additional costs for the relevant local authority arising out of the need for additional or improved infrastructure which is related to the proposed development”.</u>	
1.5 Waste Audit	008	<p>This paragraph introduces a subject that does not seem to relate to the preceding paragraphs. Is a waste audit to be a purpose of this SPD? If not why is it in this section? This paragraph should be rewritten to explain clearly what a waste audit is</p> <p>Should this in actual fact be a reference to a waste strategy rather than a waste audit which will then be used by the developer to demonstrate their proposals for meeting the requirements of the Guide (a waste audit will not do this as it presumably simply shows what waste needs to be dealt with, not how it will be dealt with?). 'Waste Audit' and 'Waste Strategy' should be defined in the Glossary.</p>	<p>Consideration should be given to why mention is made to a waste audit at this stage. A clearer explanation is needed of what a waste audit is and justification of it appearing here in the purposes section of the SPD.</p>	<p>Agree (in part): It is agreed that there is a need for greater clarity in relation to the use of waste audits and strategies in the context of the requirements outlined for the preparation of these documents in policy CS28 of the Minerals and Waste Core Strategy. This is in addition to the requirement to complete relevant parts of the RECAP Waste Management Design Guide Toolkit.</p> <p>It is therefore proposed that the reference to waste audits is removed and that more detailed guidance is provided in other parts of the Design Guide.</p> <p>It is accepted that there is a need to include a definition of the term 'waste strategy' in the Glossary</p> <p>However a definition of the term 'waste audit' is already included in the Glossary.</p>	<p>Remove paragraphs 1.5 and 1.13 and renumber paragraphs 1.6 – 1.16 accordingly.</p> <p>Add additional paragraph to follow paragraph 1.10 (text underlined):</p> <p><u>“This requirement is distinct from the requirement to prepare a waste audit and strategy which applies to all developments over the value of £300,000. These documents will be used to inform the waste management requirements required for residential and commercial developments”.</u></p> <p>Please also see response to MWRECAP40.</p> <p>Renumber paragraph 1.11 to become paragraph 1.12.</p> <p>Remove current definition of 'waste audit' in the Glossary and replace as follows: <u>Waste Audit – A formal structured process used to identify the type, composition and quantity of waste that will be produced during the construction and occupation phases of a development, usually forming part of a wider waste management strategy.</u></p> <p>Insert definitions for 'Waste Strategy' and 'Waste</p>	<p>Welcome the clarity regarding waste audits; waste strategy.</p> <p>There does need to be further clarity of why developments valued over £300,000 need an audit and that advice on preparing one can be sought from the Waste Planning Authority.</p> <p>Proposed change Therefore there should be additional wording added to the new paragraph after 1.10</p> <p>“This requirement is distinct from the requirement to prepare a waste audit and strategy which applies to all developments over the value of £300,000 <u>as set out in Policy CS28 – Waste Minimisation, Re-use and Resource Recovery. Paragraph 10.10 of the adopted Core Strategy DPD outlines what information is required in an audit and also highlights that advice can be sought from the Waste Planning Authority when preparing an audit.</u> These documents will be used to inform the waste management requirements required for residential and commercial developments. “</p>

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p>Hierarchy' in the Glossary as follows:</p> <p><u>Waste Strategy – A strategy for dealing with waste arising from the proposed development in accordance with the principles of the waste hierarchy, including specific measures to be incorporated into the developments design. The Strategy is likely to incorporate a Waste Audit and SPD Compliance Toolkit.</u></p> <p><u>Waste Hierarchy – The Government's framework for securing a sustainable approach to waste management, e.g. reuse of waste is preferable to landfill.</u></p>	
1.6 MWDP policies	009	It must be more clearly stated that the Guide is supporting these policies. As written the guide just launches into mentioning these policies without any explanation. At the very least there should be a paragraph explaining how these policies relate to the SPD rather than just listing them.	There must be a clearer explanation of why these policies from the MWDP are listed in this SPD.	Agree – this is a valid comment as there is a need to make clear that the RECAP Waste Management Design Guide is intended to provide further guidance in relation to policies CS16 and CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy.	<p>Add the following wording as separate paragraphs to follow Para 1.6 (text underlined) and replace Core Strategy policies CS28 and CS16 with the wording approved by the Inspector.</p> <p><u>This Design Guide Supplementary Planning Document (SPD) forms part of the Cambridgeshire and Peterborough Minerals and Waste Local Development Framework (LDF).</u></p> <p><u>The SPD provides additional guidance on the design of waste management infrastructure to be provided for residential and commercial development. As outlined in Policies CS16 and CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy.</u></p>	Welcome the clearer explanation of the SPD and its role.

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p><u>CS28 – Waste Minimisation, Re-use, and Resource Recovery</u></p> <p><u>The Waste Planning Authorities will encourage waste minimisation, re-use and resource recovery by requiring:</u></p> <ul style="list-style-type: none"> • <u>A waste management audit and strategy to put in place practicable measures to maximise waste minimisation, sorting, re-use, recovery and recycling of waste on all developments over the value of £300,000</u> • <u>Submission of a completed RECAP Waste Management Design Guide Toolkit Assessment</u> • <u>New development to contribute to the provision of bring sites. Contributions will be consistent with the RECAP Waste Management Design Guide and additionally in Peterborough the Planning Obligations Implementation Scheme or through the Community Infrastructure Levy in the event that this mechanism supersedes this provision</u> • <u>Temporary waste recycling facilities in strategic development areas including the Cambridge and Peterborough</u> 	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p><u>development areas, Northstowe, and St Neots. These should maximise the reuse, recycling and recovery of inert waste streams from construction and demolition operations, and be in place through the construction phases of these major development areas.</u></p> <p><u>CS16 – Household Recycling Centres</u></p> <p><u>A network of household recycling facilities easily accessible to local communities will be developed through the Site Specific Proposals Plan. New household recycling centres will be in the following broad locations as shown on the Waste Management Key Diagram:</u></p> <ul style="list-style-type: none"> • <u>Cambridge East</u> • <u>Cambridge North</u> • <u>Cambridge South</u> • <u>March</u> • <u>Northstowe</u> • <u>Peterborough</u> <p><u>New development will contribute to the provision of household recycling centres. Contributions will be consistent with the RECAP Waste Management Design Guide and additionally the Planning Obligations Implementation Scheme or through the Community Infrastructure Levy in the event that this mechanism supersedes this</u></p>	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
1.11 Basis for Conditions	010	Throughout the SPD mention is made to 'Basic Conditions and Agreements' and at no point are this term explained clearly. (Mentioned in Table 1.1 page 9; paragraphs 4.8; 8.11; 9.7; 9.10; Table 11.1.)	Explanation as to what is meant by 'Basic Conditions and Agreements' when it first appears in the SPD on page 9.	Agree – it is accepted that there is a need to clarify what is meant by the term "Basis for conditions and/or Agreements".	<u>provision.</u> Amend the final column of Table 1.1 as follows (text underlined): "Dependant upon the nature of the development it <u>will</u> be appropriate to apply planning conditions or negotiate S106 agreements / <u>CIL for the provision of waste collection, waste storage containers, Bring sites, alternative methods of waste collection and Household Recycling Centres</u> ".	For clarity rather than placing this information in a table format to describe the contents of the toolkit it would be better done as bullet points to describe each tool in the toolkit! Proposed Change <u>'The Toolkit is made up of 3 tools which are as follows</u> <ul style="list-style-type: none"> • <u>Design Standards Checklist - Developers will be expected ...</u> • <u>Assessment Criteria – Depending upon ...</u> • <u>Basis for Conditions and Agreements relating to planning permissions – Dependant upon ...</u>
1.14 Consultation.	011	Mention is made of the Cambridgeshire Design Guide for Streets and Public Realms and the consultation process included in this is suggested as the one to follow with this SPD.	It is not considered that the consultation process included in the Cambridgeshire Design Guide for Streets and Public Realms has any relevance to this section and any reference to it should be removed. The 1 st sentence should be amended with the words 'including pre-application discussions by the developer' inserted after 'on timely consultation...' Consultation should be with the Local Planning Authority. The 2 nd sentence 'In most cases, consultation...' should be removed.	Agree (in part) – It is accepted that the removal of the reference to the collaborative consultation process as outlined in Cambridgeshire Design Guide for Streets and Public Realm would provide greater clarity. However it is anticipated that the identification of waste management requirements in conjunction with the Cambridgeshire and Peterborough authorities should wherever possible be part of a collaborative process between the developer and the relevant local authorities. The suggested inclusion of reference to pre-application discussions is a valid comment as the expectation is that there will be discussions prior to submission of a planning application and completion of the RECAP Waste	Amend Para 1.14 by deleting the final sentence and amending the first sentence to read as follows (text underlined): "This Guide puts significant emphasis on timely consultation with the relevant <u>Waste Collection and Disposal Authority including pre-application discussions</u> ". Remove the third sentence in the 3 rd paragraph in the Executive Summary. Amend the existing wording in the Executive Summary (third paragraph) as follows (text underlined):	Welcome the amendments but suggest that timely consultations with the Local Planning Authority should be included too. The planning department can then refer the developer/ applicant to the relevant officer responsible for waste matters. Proposed change Therefore it would be of benefit to include in the revised wording. "This Guide puts significant emphasis on timely consultation with the <u>relevant Local Authority responsible for Planning; Waste Collection and Disposal including pre-application discussions</u> ".

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				Management Design Toolkit.	"This Guide puts significant emphasis on timely consultation with the relevant <u>Waste Collection and Disposal Authorities</u> ".	And also to similarly amend the wording in the executive summary. "This Guide puts significant emphasis on timely consultation with the relevant Local Authority responsible for Planning; <u>Waste Collection and Disposal</u> ".
1.14	011	It is presumed that the reference to the relevant Local Authority is meant as the Local Planning Authority. South Cambs would support that early consultation is important when a developer is considering submitting a planning application. South Cambs encourages developers to take part in pre-application discussion with the planning officers.	Include reference to importance of pre- application discussions to ensure that developers are aware of SPD and requirements for waste management before a planning application is submitted.	The reference to consultation (by developers) is intended to refer to Waste Collection and Disposal Authorities.	See comments above	See comments above.
1.16	012	Mention is made of Assessment criteria but it is not stated where these are to be found.	Need for clear cross referencing of where Assessment Criteria can be found page 41 in Waste Management Toolkit Section 11	Agree – the inclusion of additional wording in paragraph 1.16 would provide greater clarity.	Add the following wording to the end of Para 1.16 (text underlined): "Any such schemes must, at the very minimum, be assessed against the criteria outlined <u>on page x of this Guide (RECAP Waste Management Design Toolkit)</u> ".	Welcome clarification.
Part 2 Policy and Context	013	Whilst there is reference to policy there should be additional reference to relevant and related legislation and guidance. Useful reference and benchmark.	Refer to The Building Regulations Approved Document H, Drainage and Waste Disposal (2002 edition), Part H6 Solid Waste Disposal, and British Standard BS5906:2005 'Waste management in buildings – Code of practice' They establish general principles for location and design of waste storage facilities for various forms of development, including access (for users and the collection authority). They also contain detailed technical guidance on the provision and location of waste facilities. For example BS 5906 In section 4	Agree in part – Building Regulations principles are separate to the principles shown within this document. However, reference is made to the BS 5906 document within the Bibliography and a web link can be added, which is considered to be sufficient.	Web link to be added to the Bibliography section for the BS 5906 document.	Accept that Building regulation information is in the bibliography and welcome addition of a web link to the BS 5906 document.

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			sets out general principles of the design of facilities, stating that: 'Designers should consider: - easy and safe access for waste producers, including older persons or persons with disabilities; - easy and safe access for collectors and collection vehicles; - location and space (including avoidance of opportunity to cause nuisance or injury); - protection against animal scavenging of waste; - aesthetics of the development; - noise (e.g. glass handling); - ease of maintenance, including cleaning; - robust construction; - safety from fire risk and smoke; - lighting; - ventilation; - sound insulation; and - special requirements (e.g. separate storage and collection of healthcare waste and bulky waste)			
2.2 Waste Strategy	014	No mention of who has produced this strategy? Government department? Can a web link be placed in this document to direct the reader to the strategy?	Need to include mention of who has prepared this strategy and a web link to it if available. Suggest DEFRA Waste Strategy for England 2007 should be referred in subsequent sections as 'The 2007 Strategy' to differentiate it from other strategies e.g. waste management strategy. http://www.defra.gov.uk/environment/waste/strategy/strategy07/documents/waste07-strategy.pdf	Agree (in part) - Please see responses to MWRECAP13 and MWRECAP16. Agree – By referring to the '2007 strategy' this would provide greater clarity.	Please see responses to MWRECAP13 and MWRECAP16. Amend the existing wording in paragraph 2.4 as follows (text underlined): "The <u>2007</u> Strategy... objectives." Amend the existing wording in paragraph 2.5 as follows (text underlined): The main elements of the <u>2007</u> Strategy,....summarised as".	Welcome amendments.
2.4	015	Unclear what is meant by the reference to Part 3 in the brackets? It may be clearer to call the sections/ parts of the SPD chapters then it would clarify what is in SPD and what is in Tool kit.	Need for cross referencing of Part 3 – page number 15	Agree – the inclusion of additional wording in paragraph 2.4 would provide greater clarity.	Amend the existing wording in paragraph 2.4 as follows (text underlined): "The strategy sets a number of national targets for waste	Welcome that cross referencing will be added to paragraph 2.4

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					management <u>(which are outlined in Part 3 of the Guide (page x) and...</u>	
2.2 ; 2.6; 2.7; 2.11; 2.12	016	Again it would be useful to have a web link if possible to each document.	Need to include a web link if available	<p>Agree (in part) – the existing text refers to the Government and Defra being responsible for the preparation of PPS 10 and Designing Waste Facilities: A guide to Modern Design of Waste. It is considered that there would be merit in including references to the bodies which prepared the other documents referred to in Part 2 of the Design Guide as it would provide greater clarity.</p> <p>It is also accepted that the inclusion of web links to these documents in the Design Guide would be helpful</p> <p>Please see responses to MWRECAP13 and MWRECAP18.</p>	<p>Amend the existing wording in paragraph 2.2 as follows (text underlined): “The Waste Strategy <u>published by Government in 2007....2000.</u>”</p> <p>Amend the existing wording in paragraph 2.7 as follows (text underlined):</p> <p>Planning Policy Statement 1 (PPS1) <u>which sets out the Government’s objectives for the planning system</u> refers....infrastructure.</p> <p>Please see response to MWRECAP18.</p> <p>Web links will also be added to the Bibliography for Waste Strategy for England, PPS10: Sustainable Waste Management, PPS1: Planning for Sustainable Development, Designing Waste Facilities: a guide to modern design of waste. See response to MWRECAP13.</p>	Welcome clarification and the additions to the bibliography.
2.12	017	<p>Need to have an indication of who has produced the East of England Plan and a brief description of what this plan is. The plan not only includes policies about waste but also detailed policies about the Cambridge Sub-Region indicating housing numbers.</p> <p>Need reference to current review of East of England Plan.</p>	Need to mention that the East of England Plan is prepared by the East of England Regional Assembly (EERA), which is the regional planning body for the East of England and has a statutory duty to prepare and implement the Regional Spatial Strategy known in this region as the East of England Plan.	Please see response to MWRECAP16 and MWRECAP18.	Please see responses to MWRECAP16 and MWRECAP18.	This objection has been overtaken by events since the Government is to revoke regional plans the East of England Plan will no longer need to be included in the SPD.
2.14	018	It is confusing to have supporting text for the policies in the East of England Plan in bold type – the same as is done when quoting from the actual adopted policies.	Need to differentiate clearly between what is policy and what is supporting text in the East of England Plan.	Disagree - the text in paragraphs 2.12 – 2.15 makes it clear whether the quote is from a policy or supporting text.	Delete paragraphs 2.12 – 2.15. Please see responses to MWRECAP16 and	See comments above for Rep no 017

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				The Government announced on the 5 th July 2010 that with immediate effect the existing Regional Strategies including the East of England Plan would be revoked. It is therefore proposed to remove the text which appeared in the draft version of the Guide.	MWRECAP17. Plus the additional amendments section	
2.17	019	The detailed definitions of what is meant by Development Plan Documents etc should be included in an Appendix or glossary and does not appear to be relevant here.	Remove the definitions of DPDs; SPDs and SCI into a glossary or appendix.	Agree – this is a sensible suggestion as it would ensure that the Cambridgeshire and Peterborough Minerals and Waste Development Plan features more prominently in this part of the Design Guide.	Delete Para 2.17 with the exception of the 1 st sentence and move definitions in final sentence to glossary of the Design Guide.	Welcome amendments.
2.18	020	There should be a clearer definition of what the Minerals and Waste Development Plan is and the documents it will include. These are currently out for consultation so at a further stage than is implied in the last paragraph on page 18 ‘are drafting ...’	Include a clear description about the Minerals and Waste Development Plan and the stage in preparation it has now reached. – Proposed Submission.	Agree – there is a need for a greater clarity in relation to the content and status of the Cambridgeshire and Peterborough Minerals and Waste Development Plan. Please also see response to MWRECAP9.	Amend existing text in Para 2.18 as follows (text underlined): “Matters relating to minerals and waste for the area are the responsibility of Cambridgeshire County Council and Peterborough City Council.” Replace existing text in Para 2.19 as follows (text underlined): The <u>Cambridgeshire and Peterborough Minerals and Waste Development Plan</u> which forms part of the Framework <u>consists of two parts as follows:</u> <ul style="list-style-type: none"> • Core Strategy: which <u>sets out the vision for mineral and waste management development, the broad locations where it will take place, the amount that will be provided,</u> 	Welcome clarification. However in the suggested wording for paragraph 2.19 it implies that both the Core Strategy and the Site Specific Proposals Plan will both be adopted in 2011. This amended wording has now been revised in the final draft SPD and correctly indicates that the Site Specific Proposals Plan may be adopted in 2012. This is to be welcomed.

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					<p><u>and policies which will be used to determine planning applications. It also makes key allocations at Block Fen / Langwood Fen, Mepal and at Addenbrookes Hospital, Cambridge</u></p> <ul style="list-style-type: none"> • Site Specific Proposals Plan: which <u>makes all the other site specific allocations for mineral extraction and waste management development.</u> <p>Para 2.19 to be amended to include the following:</p> <p>It will be a comprehensive <u>Minerals and Waste Plan</u>, which when adopted in 2011, will supersede the Cambridgeshire (Aggregates) Minerals Local Plan and the Cambridgeshire and Peterborough Waste Local Plan. The Cambridgeshire and Peterborough Minerals and Waste Development Plan is the “parent” document to which the Design Guide is linked (please see part 1 of the Guide for further details).</p> <p>Please also see response to MWRECAP9.</p>	
2.21-2.24	021	Could a web link be included to each of these documents?	Include a web link for each document.	Agree (in part) – this is a sensible suggestion. However, it is considered that web links should appear in the Bibliography as opposed to the body of the Design Guide.	Web links will be added to the Bibliography. Please also see responses to MWRECAP13, MWRECAP14, and MWRECAP16.	Welcome inclusion of web link but could a footnote be added to say that such links are included in the bibliography. Proposed change Include an additional sentence at the end of the first

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						paragraph in this Part 2 of the SPD to say that web links are included in the bibliography for the documents listed in Part 2 of the SPD.
2.22 Cambridgeshire County Council Household Recycling Centre Strategy	022	It is not clear who it was who adopted this Strategy in December 2006 and what status does it has in planning terms.	Need to include who adopted this Strategy and its planning status.	Agree –This is a valid comment as it would provide greater clarity. This document was adopted as County Council policy at a Cabinet meeting on 5 th December 2006 and is therefore a material consideration in the determination of residential and commercial planning applications covered by the provisions of the RECAP Waste Management Design Guide.	Amend existing text in Para 2.22 as follows (text underlined): “This document <u>was adopted by the County Council</u> in December 2006, <u>which sets out...targets</u> ”.	Welcome clarification relating to this strategy and the amendment to para 2.22.
2.23 Cambridgeshire Design Guide for Streets and Public Realm	023	It is not clear what the planning status of this document is? Has it been adopted as a Supplementary Planning Document by the County Council?	Need to clarify planning status of this document.	Agree –This is a valid comment as it would provide greater clarity. The Cambridgeshire Design Guide for Streets and Public Realm was adopted as County Council policy at a Cabinet meeting on 16 th October 2007 and is therefore a material consideration in the determination of residential and commercial planning applications covered by the provisions of the RECAP Waste Management Design Guide.	Amend existing text in Para 2.23 as follows (text underlined): “The Design Guide <u>was adopted as County Council policy in October 2007,</u> <u>which..... Supplementary Planning Document</u> ”.	Welcome clarification relating to this strategy and the amendment to para 2.23.
2.25	024	If it is the intention for the SPD to be adopted in June 2011 why was it consulted on so early before the MWDP has been adopted?		The purpose of consulting upon the RECAP Waste Management Design Guide at the same time as the Core Strategy was to demonstrate how the relevant Core Strategy policies would be implemented and to avoid a potential “policy vacuum” following the adoption of the Core Strategy. However, It is accepted that any changes to the content of the Minerals and Waste Core Strategy policies CS16 and CS28 will need to be taken into account prior to adoption of the RECAP Waste Management Design Guide.	No amendments required.	This objection has been overtaken by events since the Minerals and Waste Core Strategy has now been adopted and amendments to the SPD have been made in this consultation.
3.1	025	There needs to be mention in this section of the fact that Cambridgeshire comes within the area identified by Central	Need to describe the step growth in housing that is planned for the Cambridge Sub Region in the East	Agree (in part): it is accepted that the recent growth in population within Cambridgeshire and Peterborough	Amend existing text in paragraph 3.1 as follows (text underlined):	Welcome this amendment.

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		Government as an area where there will be a step change in growth and that this is planned for in the East of England Plan up to 2021 and beyond. It is not just the 'popularity of the area' that has led to an increase in its population but it has been specifically identified as a growth area where there will be a planned step increase in house building.	of England Plan.	has come about through the Growth agenda and the planning process rather than attractiveness of the area.	"The <u>designation</u> of the Cambridgeshire and Peterborough area <u>as a Growth area</u> has led to a significant increase in population in recent years".	
Generation of municipal waste section Page15	026	Much of the information about waste at the local level and national targets is included in the MWDP and does not need to be repeated in detail in this SPD.	Amend section that is outlining waste at a local level and the national targets since this is repeating information contained within the MWDP.	Disagree – this information provides the context for the scale of waste arising from households, which is expected to be addressed by the Minerals and Waste Core Strategy and the SPDs particularly the RECAP Waste Management Design Guide.	No amendments required.	Disagree that the national targets and local information on waste needs to be repeated in the SPD when it is already included in the adopted Minerals and Waste Core Strategy. The SPD is providing guidance to this adopted plan so does not need to repeat its content. Proposed changes That the detailed information already included in the adopted Minerals and Waste Core Strategy should be removed from the SPD.
3.6	026	The first paragraph is confusing and in the wrong tense. It states that there will be an increase in waste in 2005 – surely we will know this now 2010?	Amend first paragraph.	Agree in part – Whilst it is agreed there is an issue with the tense and dates quoted within Paragraph 3.6, it focuses on the East of England Plan so it should now be deleted from the document.	Delete paragraph 3.6 to take account of the forthcoming repeal of the RSS (East of England Plan) as a result of the Localism Bill. Please see additional amendments section	This objection has been overtaken by events since it refers to the East of England Plan
External storage capacity 4.7	027	It states that as a minimum developers will be required to provide that appropriate amount of space... However if there is a proven need what penalties are there if a developer does not pay for additional waste capacity?	Need for clarification.	Agree – the expectation is that the space required for containers will form part of the design of residential and commercial developments as set out in the plans and supporting documents which form part of planning applications. The expectation is that the requirement to provide sufficient space for waste storage will be	Amend existing text in paragraph 4.7 as follows (text underlined): "As a guide to...Appendix A. <u>This requirement should be reflected in the design of developments and will be secured by Local Planning Authorities through the application of appropriate planning conditions.</u>	Welcome revised wording

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				secured through planning condition(s) to secure compliance with approved plans.	<p>Add additional text to Table 11.5 in a new row to appear in Waste Storage Container Section as follows (text underlined to be added):</p> <p><u>Sufficient space for waste containers as outlined in Part 4 of the RECAP Design Guide.</u></p> <p>Finance will be provided by the developer sufficient to allow for the provision of appropriate waste storage containers by the local authority.</p> <p>Provision of appropriate waste storage containers shall be made by the developer sufficient to meet the needs of the development.</p>	
Part 5 page 23	028	Need for paragraph numbers in this part/ chapter of the SPD.	Include paragraph numbers in this part of the SPD.	Agree – Paragraph numbers will be inserted, this is a typographical error.	Add paragraph numbering to Part 5 of the Guide.	Welcomed.
Part 5: Waste Storage Points	028	No reference to noise and odour associated with storage. The Design Standard checklist (which has been included as a supplement on the consultation version of the SPD to be inserted after paragraph 11.9) and assessment guidance sheet refers to protection of Environment –Nuisance and Amenity	Include paragraph to highlight these issues e.g. - The siting and design of bin storage areas and in particular communal and underground storage including screened hard-standings and enclosed stores, should also have regard to the impact of noise and odour nuisance etc on the occupiers of neighbouring properties, existing and proposed. Should have basic lighting and should have drainage facilities to assist cleaning.	<p>Agree –Design Standards Checklist to be included within the document, this is a typographical error.</p> <p>Disagree – there is existing guidance provided in Appendix D relating to the design of waste storage compounds which covers issues of noise and odour and the issues identified.</p>	Add Design Standards Checklist to the RECAP Waste Management Design Guide Toolkit.	Agree that this matter is covered in Appendix D.
Page 26 Collection frequency	028	It may be better to suggest at this point that to find out information on the frequency of collections that developers contact the relevant individual local authorities. By including an appendix with the latest information this may become out of date and could not easily be amended. It would take some time to review the SPD due to the procedures	<p>Amend the paragraph on Collection Frequency so that developers should contact the relevant waste collection authority to find out about the current collection frequencies.</p> <p>Delete 1st sentence ‘ Current collection frequencies...’</p>	Agree – this is a valid comment as waste collection frequencies within Cambridgeshire and Peterborough will be subject to further change in the future.	Delete first sentence of final Para in Part 5 of the Guide and amend as follows (text underlined): “As <u>collection frequencies</u> are subject to change <u>it is therefore recommended that applicants contact</u> the relevant Waste Collection Authority for the	Welcome amendments.

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		that are have to be followed as it is an official planning document.			<p>most up to date information.</p> <p>Then in the Glossary amend the second sentence of the definition of 'collection frequency' for clarity to state: <u>Further details relating to current collection frequencies are available from the Cambridgeshire and Peterborough Waste Collection Authorities.</u>"</p> <p>Remove Appendix C – Current Local Authority Waste Collection Frequencies</p>	
Part 6 Waste Storage Infrastructure	029	<p>This section should be restructured so that it deals clearly with above ground storage (design and construction) and underground storage (design and construction).</p> <p>No mention is made of Appendix D, which indicates the design specifications for a storage compound and should be mentioned near the beginning of this part of the SPD.</p> <p>An additional section must be included in this part about what should be considered in the design of a storage compound. At present the design specifications are included in Appendix D. A summary of this should be within the main body of the SPD</p>	<p>Restructure this section of the SPD so that the information relating to above-ground and underground storage is placed together.</p> <p>Mention should be made of Appendix D in paragraph 6.3</p> <p>A summary of Appendix D should be included in Part 6 of the SPD.</p>	<p>Agree – The restructuring of this section is a sensible suggestion which would provide greater clarity.</p> <p>Disagree – paragraph 6.3 is intended to set out the general principles which would apply to waste storage as opposed to the design of Waste Storage compounds which appears in Appendix D.</p> <p>Disagree – Para 6.3 should not summarise Appendix D as it relates to the requirements in addition to those in Appendix D. Please also see response to MWRECAP32.</p>	<p>Reorder existing text as follows:</p> <p>Para's 6.4, 6.5, 6.6, 6.12, 6.13 to be renamed as Para's 6.4 – 6.8.</p> <p>Para's 6.7, 6.9 and 6.14 to be renamed as Para's 6.9 to 6.12</p> <p>Para's 6.10 and 6.11 to be renamed as Para's 6.13 and 6.14.</p> <p>Please also see response to MWRECAP32.</p>	<p>Welcome the restructuring of this section however there needs to be more information about design specifications in this section rather than leaving it in an appendix. Whilst recognising that Appendix D only relates to above ground waste facilities the design of underground storage compounds also must be considered. It would appear the functional requirements of both above ground and underground waste storage are being given greater emphasis than the design elements. Both are equally important if new residential and commercial property developers are to better provide for waste management within new developments. Good design and well functioning waste areas are vital to improve recycling and reducing waste for collection.</p> <p>See main report for detailed comment.</p>

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Waste Storage Infrastructure (Questions 3 and 4)	030	Question 3 and 4 The SPD in considering the practical needs of how to assist a developer in planning for waste management in residential and commercial developments is welcomed by South Cambs. It will assist planners to recognise the need to consider waste within proposed developments. However the emphasis seems to be upon the technical/ functional specifications needed for waste facilities at the expense of considering the aesthetic design of such facilities to fit into their surroundings. This should be addressed in the SPD.		Agree – it is accepted that there is a need to give greater emphasis to urban design principles within the RECAP Waste Management Design Guide. Please see response to MWRECAP31.	Please see responses to MWRECAP31.	Welcome acceptance of need to include more urban design principles within SPD See main report for detailed comment
6.3	031	An additional general principle should be added. The design of waste storage compounds should consider the local character and should be designed to fit in with its surroundings. Whilst appreciating that such compounds must be functional consideration must be given to their appearance. 'The Location and Design of Waste Management Facilities SPD' uses the term 'local distinctiveness'.	An additional general principle should be added to consider the appearance of the waste storage compound and how it fits in with its surroundings. I.e. Sensitivities to Urban Design considerations/ Local Distinctiveness.	Agree – it is accepted that there is a need to give greater emphasis to urban design principles within the RECAP Waste Management Design Guide.	Amend existing text in paragraph 6.3 as follows (text underlined): "5. Environmental protection <u>6. Urban design principles, including the local character, place making and local distinctiveness of an area</u> " Please see response to MWRECAP75.	Welcome inclusion of additional principle.
6.12 Specific requirements for above ground storage compounds.	032	This should be reworded to highlight the construction outcomes to be achieved e.g. easily cleanable, accessible, proof against rodents, easily ventilated etc	This should be reworded to highlight the construction outcomes to be achieved e.g. easily cleanable, accessible, proof against rodents, easily ventilated etc	Disagree – it is considered that there is sufficient guidance in relation to these issues in the RECAP Waste Management Design Guide (Assessment Criteria) and Appendix D.	No amendments required. Please see response to MWRECAP29.	Disagree and reaffirm that this needs to be included in the SPD. Proposed change Amend paragraph 6.6 in revised SPD to include additional construction outcomes – easily cleanable; accessible; proof against rodents; easily ventilated.
7.3 Key aspects of highway design	033	Whilst agreeing that highway design is a key to vehicles collecting waste in a new development there are a number of other considerations that sometimes may conflict with this, such as street design and local character. Although mention is made in the introduction paragraphs 7.2 to the Cambridgeshire Design Guide for Streets and Public Realm this section	Include consideration of street design and local character and specific reference to Cambridgeshire Design Guide for Streets and Public Realm with web link	Agree – this is a valid comment as reference is made to the need to take account of the character of the area as part of highway layouts set out in the Cambridgeshire Design Guide for Streets and Public Realm.	Amend paragraph 7.3 (text underlined): <ul style="list-style-type: none"> • Offer convenience to users • <u>Take account of local character and distinctiveness of an area.</u> 	Welcome this amendment.

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		should include reference to the need to consider local character in highway design.				
Part 8 Household Recycling Centre 8.7- 8.11	034	The future planning of this is contained within the MWDP and therefore this section should be re-written to reflect what is included in the current MWDP.	The future planning of this is contained within the MWDP and therefore this section must reflect what is included in the current MWDP.	Disagree – the text in paragraph 8.7 is consistent with policy CS16 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy in relation to the provision of Household Recycling Centres.	No changes proposed.	In the current consultation draft of the SPD Policy CS16 has now been added to the paragraph, which is to be welcomed.
8.8	035	It would be clearer if the actual policy relating to HRC were included in this paragraph since it relates directly to this section.	Include Policy CS16 in this paragraph.	Agree – this is a sensible suggestion. The text in paragraph 8.8 is a summary of Policy CS16 of the Minerals and Waste Core Strategy. However, it is accepted that the inclusion of the full text would provide greater clarity and make it clear that this section of the RECAP Design Guide is directly related to the content of policy CS16.	Remove existing text in paragraph 8.8 and replace with the following wording (text underlined): <p><u>“CS16 – Household Recycling Centres</u></p> <p><u>A network of household recycling facilities easily accessible to local communities will be developed through the Site Specific Proposals Plan. New household recycling centres will be in the following broad locations as shown on the Waste Management Key Diagram:</u></p> <ul style="list-style-type: none"> • <u>Cambridge East</u> • <u>Cambridge North</u> • <u>Cambridge South</u> • <u>March</u> • <u>Northstowe</u> • <u>Peterborough</u> <p><u>New development will contribute to the provision of household recycling centres. Contributions will be consistent with the RECAP Waste Management Design Guide and additionally the Planning Obligations Implementation Scheme or through the Community Infrastructure Levy</u></p>	Welcome inclusion of policy wording.

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<u>in the event that this mechanism supersedes this provision.</u>	
8.9	036	Is there a threshold of number of houses in a development when a developer will have to contribute to a HRC? Or will this depend on where the housing is to be and what the existing provision of recycling there is. At present this does not give any idea of what contribution may be expected. Has the County Council produced any guidelines that may assist in negotiations? This information should be included in the SPD.	Need for clarity in what size of development would attract contributions to a HRC. The SPD should include further information on when contributions may be asked for.	<p>Agree (in part) – To ensure that developer contributions for additional Cambridgeshire Household Recycling Centres and/or improvements that will be sought are directly related to proposed developments further revisions to the RECAP Waste Management Design Guide are required.</p> <p>Further work has been undertaken by the County Council's Waste Management Service to determine the scale and nature of the developer contributions, which will be sought for the upgrading of existing Recycling Centres (Alconbury, Wisbech, Whittlesey and Thriplow) and additional capacity/ Recycling Centres (March, St Neots, Witchford and Cambridge area.)</p> <p>Based upon current assumptions relating to the level of expected housing growth it is not considered that developer contributions will be required for the other Recycling Centres within the County.</p> <p>The basis for developer contributions including waste management infrastructure in the Peterborough City administrative area is set out in the Planning Obligations Implementation Scheme SPD which was adopted by Peterborough City Council in February 2010. However, this will need to be amended to take account of CIL in Para 8.10.</p>	<p>Add new sub titles above paragraphs 8.7, 8.10 and 8.11, amend existing text in paragraphs 8.7, 8.9 and 8.10 and add additional paragraphs following 8.7 and 8.10 as follows (text underlined to be added and text with strikethrough to be removed):</p> <p>(Add new sub title above paragraph 8.7 and below the 'Future Provision of Household Recycling Centres' title as follows) <u>Cambridgeshire</u></p> <p>(Amendments to Paragraph 8.7) To adequately serve the growing population of the area, the current network of centres is to be upgraded by improving sites, relocating sites and constructing additional sites between now and 2026. <u>New sites in Cambridgeshire will typically be on 1.2 hectares of land, allowing enough flexibility to manage traffic flows of the site, by accommodating split-level easy access for unimpeded traffic movement through the site. This site size will also allow for effective landscaping, as well as the ability, where appropriate, to provide further environmental mitigation in more populated areas by putting the operations under a roofed area, or in a building. Upgrades to existing sites on the other hand will increase the site capacity by:</u></p> <ul style="list-style-type: none"> • <u>Extending the site size</u> 	<p>Whilst welcoming the revisions and additional paragraphs within the SPD there is still insufficient information available.</p> <p>See main report for further details.</p>

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p><u>to improve both skip capacity and traffic circulation</u></p> <ul style="list-style-type: none"> • <u>Where possible make the site split level</u> • <u>Improving the existing provision and contract arrangements</u> <p>(New paragraph to be inserted after 8.7) <u>In Cambridgeshire a county wide network of Household Recycling Centres (HRC) is being developed to meet the pressures of growth, and stringent targets for diversion of waste from landfill. There is a need for:</u></p> <ul style="list-style-type: none"> • <u>New HRCs to replace those which have temporary planning permissions</u> • <u>Upgrades giving increased capacity at existing HRCs</u> <p><u>The network of HRCs to serve Cambridgeshire will comprise:</u></p> <ul style="list-style-type: none"> • <u>Witchford – a permanent replacement for existing temporary site at Grunty Fen</u> • <u>March – a permanent replacement for an existing temporary site</u> • <u>Thriplow – upgrade of existing site giving increased capacity</u> • <u>Whittlesey – upgrade of existing site giving increased capacity</u> • <u>Wisbech – upgrade of existing site giving increased capacity</u> • <u>St Neots – a permanent</u> 	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p><u>replacement for original temporary site</u></p> <ul style="list-style-type: none"> • <u>Cambridge – four new sites giving increased capacity as permanent replacements for existing temporary site at Milton</u> • <u>Alconbury – minor changes in capacity required at this site</u> • <u>Bluntisham – no change in capacity required at this site</u> <p><u>Table 8.1 and Map 1 at the end of this schedule show the Recycling Centre Catchments which indicates both the locations of sites and the catchment covered. The catchments are grouped by political ward, and allocate the existing and projected population to each site.</u></p> <p>(Amendments to Paragraph 8.9) Although developers will not be expected to construct Household Recycling Centres, they will be expected to contribute finances in accordance with <u>Planning Obligations Circular 05/05 or through the Community Infrastructure Levy (CIL) in the event that this mechanism supersedes this provision,</u> proportionate to their development, or as required as part of the Community Infrastructure Levy (where waste management infrastructure is included). At strategic locations developers will be required to provide land and/or provide:</p>	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<ul style="list-style-type: none"> • Finance for upgrading existing Household Recycling Centres; • Finance for new Household Recycling Centres <p><u>New sites will be constructed and other improvements made to existing sites in a timely manner, to enable both the existing and new populations to benefit from the service. The timetable for new waste infrastructure development is linked to both planned growth and funding.</u></p> <p>(Amendments to Paragraph 8.10) In Peterborough financial contributions will be consistent with the Planning Obligations Implementation Scheme. In Cambridgeshire financial contributions will be calculated on a per dwelling basis. Within Cambridgeshire the type of contribution which will be sought within a particular locality will relate to the need for new or improved Household Recycling Centres within the service areas identified above. Financial contributions will be calculated on a per dwelling basis.</p> <p>(New paragraph to be inserted after 8.10): <u>Outline costs for a covered facility in Cambridgeshire on 1.2 hectares are based on an independent assessment of site costs. As at 2010, a new site will cost £5.5 million taking into account location and layout. Outline costs for</u></p>	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p><u>upgraded facilities will be based on an independent assessment of site costs, and on real costs incurred. Outline costs include all reasonable activities associated with the development of a site including site investigations, indicative land costs, legal fees, landscaping, environmental mitigation, design, construction and planning costs. The requirement for developer contributions within these service areas is set out in Table 8.1[please see table at end of the schedule]. The delivery of new dwellings in the County will increase the demand for recycling facilities. Therefore developers will be required to contribute towards the delivery of the new network of recycling facilities by providing a financial contribution on a per dwelling basis in relation to the HRC network. Developer contributions established in principle in this document will be subject to suitable indexation and inflation applied as appropriate. The methodology used for determining the financial contributions can be seen in Table 8.2 [please see table at end of the schedule]. However, it should be noted that if when CIL is adopted by the District Councils it includes the County's Waste requirements this table will be superseded.</u></p> <p>(Add new sub title above paragraph 8.10 as follows) <u>Peterborough</u></p>	

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<p>In Peterborough financial contributions will be consistent with the <u>requirements of the adopted Planning Obligations Implementation Scheme or through CIL in the event that this mechanism supersedes this provision.</u></p> <p>(Add new sub title above paragraph 8.11 as follows) <u>Planning Conditions and Legal Agreements</u></p>	
Household Recycling Centres (paragraph 8.11)	037	<p>The Council is concerned at the lack of information within the Design Guide to justify the request for contributions to household recycling centres. Planning obligations cannot be used to ask developers to simply provide contributions to extra sites. There are five tests that have to be satisfied to allow obligations to be sought.</p> <ol style="list-style-type: none"> 1. Relevant to planning; 2. Necessary to make the proposed development acceptable in planning terms; 3. Directly related to the proposed development; 4. Fairly and reasonably related in scale and kind to the proposed development; and 5. Reasonable in all other respects. <p>In the MWDP Core Strategy in Policy CS16 it states that '... New housing development will contribute to the provision of household recycling centres. Contributions will be consistent with RECAP Waste Guide...'. South Cambs is concerned that the DPD cannot require such contributions from planning obligations and as drafted the SPD does not contain sufficient information about this matter to provide guidance to developers.</p>	Proposed change to SPD – Need to contain more information / guidance relating to how contributions to HRC will be calculated in order that Policy CS 16 can be implemented successfully.	<p>Agree – To ensure that developer contributions for additional Cambridgeshire Household Recycling Centres and/or improvements that will be sought are directly related to proposed developments further revisions to the RECAP Waste Management Design Guide are required.</p> <p>The basis for developer contributions including waste management infrastructure in the Peterborough City administrative area is set out in the Planning Obligations Implementation Scheme SPD which was adopted by Peterborough City Council in February 2010.</p> <p>However, this will need to be amended to take account of CIL in Para 8.10.</p>	<p>Please also see proposed amendments to paragraphs 8.7, 8.9 and 8.10; two new paragraphs inserted after paragraphs 8.7 and 8.10; and new sub titles above paragraphs 8.7, 8.10 and 8.11 (MWRECAP36) and the Basis for Conditions and/or agreements.</p> <p>Amend existing text in paragraph 8.11 as follows (text underlined):</p> <p>Section 106 agreements or other suitable legal agreements <u>such as CIL</u>, will be used to secure contributions and ensure adequate infrastructure exists. Reference should also be made to the Basis for Conditions and/or Agreements which form part of the RECAP Waste Management Design Guide Toolkit which details potential conditions and agreements that a developer may, in discussion with the Local Planning Authority, be legally obliged to satisfy.</p>	<p>Although additional information has been included in the latest draft it is still not clear what a developer may be expected to contribute to HRCs.</p> <p>See main report for details.</p>

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<u>Prior to the submission of residential planning applications developers are advised to agree these requirements with the County Council as Waste Disposal Authority.</u>	
Part 9	038	It must be clearly stated that Bring sites are the responsibility of District Councils.		Agree (in part) – this is a sensible suggestion however Peterborough City Council and the Cambridgeshire Districts are both responsible for the provision of Bring sites. It is therefore proposed to include reference to Waste Collection Authorities.	Amend existing text in paragraph 9.1 as follows (text underlined): “Bring Sites <u>which are provided by the Waste Collection Authorities</u> are an essential element of the RECAP Waste Strategy”.	Welcome clarification but it could be added that the Waste Collection Authorities in Cambridgeshire are all the District Councils. Proposed Change Amend paragraph 9.1 as follows (text underlined): “Bring Sites are an essential element of the RECAP Waste Strategy <u>and are provided by the Waste Collection Authorities which in Cambridgeshire are all the District Councils.</u> ”.
9.2	039	What is the definition of ‘1 Bring site ‘ – i.e. how many containers etc? Is it the same across all Local Authorities? Are there any accessibility standards to consider regarding the location of Bring sites (i.e. all residents should live within ‘x’ metres of a Bring site etc)?	Need for clear definition of a Bring Site and where this is the same for every Local Authority. Should include any accessibility standards especially as this may help a developer consider these sites in the waste audit for a new development.	Agree – it is accepted that there is a need clarify what is meant by the term ‘Bring Site’ to provide greater clarity. Disagree – locational guidance relating to the location of Bring sites is provided in paragraph 9.9 of the Design Guide. Please also see response to MWRECAP41.	Amend existing text in paragraph 9.2 as follows (text underlined): “ <u>Bring sites are places where members of the public can bring their waste and separate it into large containers (e.g. bottle and paper banks at local supermarkets)</u> which are generally located within publicly accessible areas such as supermarket or public car parks. Please also see response to MWRECAP41.	Welcome inclusion of definition.
9.6	040	Mention is made that the location of Bring Sites should be included by a developer in a waste audit. – How are developers to understand the capacity contained within existing bring site provision? Should there be a statement explaining how District Council	There will need to be further information available about bring sites and where developers can find out about the existing provisions within a district if this is to be included in a waste audit.	Agree – there is a need for greater clarity in relation to the preparation of documents to be prepared by developers and the information relating to Bring Sites held by the Waste Collection Authorities. Please see response to	Amend paragraph 9.6 as follows (text underlined): “This should be done through <u>the preparation of a waste audit and strategy having sought the advice of the relevant Waste Collection Authority relating to the current capacity of existing</u>	Welcome the amendment. Early discussions with the Waste Collection Authority (WCA) will enable developers to understand what to include in the waste audit and for the WCA to let them know whether the scale of development

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		<p>will publish this information?</p> <p>Should there be sufficient capacity to incorporate new residents (ie existing bring sites are under used) then presumably no contribution would be sought?</p> <p>What occurs in the scenario where there is insufficient bring site space to cope with existing demand ? The applicant is not required to alleviate existing issues therefore what is the calculation for the section 106 contributions?</p>	<p>There needs to be clarity in the SPD as to how section 106 contributions will be calculated.</p>	<p>MWRECAP41.</p>	<p><u>Bring Sites</u>".</p> <p>Please see response to MWRECAP41.</p>	<p>proposed and the quantities of waste it may generate would result in the need for an additional Bring site.</p>
9.7	041	<p>Need for clearer guidance for developers where possible as to thresholds and location criteria as to where a bring site should be located. Otherwise there will be lots of negotiations on a site-by-site basis and need for continuity.</p>	<p>Suggest making it clear that these will vary according to the nature and scale of the proposed development and associated supporting infrastructure and will be based on any additional costs likely to be incurred by the local authority arising out of the proposed development. Each development will have to be individually assessed. Early pre-application consultation with the Local Planning Authority is therefore essential.</p>	<p>Agree – there is a need for greater clarity in relation to how developer contributions for Bring Sites will be identified and sought by the relevant local authority. This ideally forms part of the pre-application discussions together with the other issues identified in the RECAP Design Guide.</p> <p>Please see response to MWRECAP40.</p>	<p>Amend paragraph 9.7 as follows (text underlined): “Developers will be required....upgrade. <u>The nature and scale of the contributions which will be sought will be based on the additional costs arising from the proposed development.</u> Developers should discuss these issues with the Local Planning Authority and Waste Collection Authority <u>as part of pre-application discussions</u> prior to submitting their planning application. Reference should also be made....agreements”.</p> <p>Please see response MWRECAP5 which takes account of CIL within Para 9.7.</p>	<p>Welcome the amended wording to the SPD.</p>
9.8	042	<p>The requirement for one Bring site facility per 800 households should be more clearly highlighted in the text. Also the requirement for a temporary site on the occupation of the 50th property At present this is all lost in the paragraph and yet it is an important requirement.</p>	<p>Highlight the requirement for one Bring Site facility per 800 households as a separate paragraph in bold text.</p> <p>Highlight the requirements for a temporary site.</p>	<p>Agree – this is a sensible suggestion as it would emphasis some of the key messages within the RECAP Waste Management Design Guide.</p>	<p>Amend paragraph 9.8 to form two separate paragraphs as follows (text underlined):</p> <p><u>Standards for the provision of Bring Sites for residential developments</u></p> <ul style="list-style-type: none"> • <u>A</u> maximum density of one Bring site per 800 households will be sought. 	<p>Welcome amendments to SPD</p>

Relevant section of SPD (2010)	Rep no. (MWRE CAP)	Comments by South Cambs in Pre Submission consultation (March 2010)	Proposed change to SPD asked for by South Cambs (March 2010)	Response by Cambridgeshire County and Peterborough City Councils (April 2011)	Proposed amendment to SPD (April 2011)	South Cambs response to amendment and proposed change (Sept 2011)
					<ul style="list-style-type: none"> Where on site provision... agreement). Temporary facilities....operational. <p>However, ... adequately met".</p>	
Part 10	043	South Cambs welcomes the consideration of education schemes to encourage recycling and waste reduction. However this information could be placed in an appendix rather than in the main body of the SPD.	Put Part 10 as an appendix of the SPD.	Agree – this is a sensible suggestion as these are complementary waste management measures which are open to developers rather than requirements. It is therefore agreed that Part 10 of the Guide should become an appendix to the Guide.	Part 10 of the Guide to be moved so that it appears after Appendix B: Compactor Use, descriptions and specifications and renamed as Appendix C: Education Schemes and additional options. This will replace current Appendix C (see response to MWRECAP28)	Welcome the amendment.
Toolkit	044	There needs to be clarification of whether it is expected that all scales of both residential and commercial development would be expected to use the toolkit... This is a requirement of Policy CS28 and it may be clearer to have this stated at the beginning of this section of the SPD..	<p>Make clear that all developments will require submission of the Toolkit with supporting information proportionate to the nature and scale of the development.</p> <p>Clarify how Toolkit will be used and that it must be submitted with each planning application. Stress again importance of early pre-application consultation with LPA</p>	<p>Agree (in part) – it is accepted that there is a need to clarify the applicability of the RECAP Waste Management Design Toolkit. In doing so it is important to emphasise that it only applies to residential and commercial developments.</p> <p>Please also see responses to MWRECAP45, MWRECAP46, MWRECAP85 and MWRECAP89.</p>	<p>Add the following text to paragraph 11.1: “The <u>purpose of the RECAP Waste Management Design Toolkit (referred to as the Toolkit)</u> is to allow the effective evaluation of the waste management requirements for <u>residential and commercial</u> developments.</p> <p>For all such developments a completed version of the RECAP Waste Management Design Guide Toolkit should be submitted with the planning application as set out in policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy”.</p> <p>Please also see responses to MWRECAP45, MWRECAP46, MWRECAP85 and MWRECAP89.</p>	<p>Welcome amendments but suggest that in order to emphasis that it is all scales of both residential and commercial developments that will have to use the toolkit that paragraph 11.1 states this.</p> <p>Paragraph 11.1 to be reworded as follows -: “The <u>purpose of the RECAP Waste Management Design Toolkit (referred to as the Toolkit)</u> is to allow the effective evaluation of the waste management requirements for <u>all scales of both residential and commercial</u> developments</p>
11.1 How to use the guide.	044	If the Toolkit is to be an extractible easy to use element of the SPD there would need to be additional wording included in the introduction to the toolkit so that it can stand alone	Add information as to what toolkit is and where it is applicable so that if it becomes a stand-alone document there is sufficient information within it to explain what it is and how to use it.	See above		

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Toolkit	045	<p>If it is expected that a toolkit be completed by every developer submitting a planning application consideration needs to be given to the format of the SPD so that it is easy to find and use. Currently it is difficult to identify the section, which is the Toolkit.</p> <p>Consideration should be given to putting the Toolkit section at the end of the SPD so that it is easier to find and it could have a different coloured font or background so that it is differentiated from the rest of the SPD. A pocket could be included in a page version of the SPD and the Toolkit placed within it as an easy to find and use item of the SPD. On an electronic version it could be identified separately to the main SPD and be possible to interactively fill in the information. It is important that it can be easily extracted and completed as required.</p> <p>The checklist is referred to early in the SPD, therefore could be a 'user-friendly' extracted document as an appendix, especially important for the electronic version to be able to</p> <p>It is not obvious the toolkit CHECKLIST is ultimately being introduced because of the emphasis on the toolkit components. It is not immediately apparent that the breakdown will follow.</p>	<p>There needs to be consideration of how the Toolkit section fits into the SPD.</p> <ul style="list-style-type: none"> - The Toolkit section could be placed at the end of the SPD - Consider using a different coloured background or font - A paper version of the SPD could include a pocket to contain a Toolkit as a separate document. - An electronic version of the SPD could have the Toolkit as a separate document and make it easy to interactively complete the forms and submit them. 	<p>Agree – this is a sensible suggestion given the importance of the RECAP Waste Management Design Toolkit.</p> <p>Please also see responses to MWRECAP44, MWRECAP46, MWRECAP85 and MWRECAP89.</p>	<p>The RECAP Waste Management Design Toolkit will be presented as a pullout sheet which will sit at the front of the guide and cross refer to the relevant parts of the RECAP Waste Management Design Guide.</p> <p>Please also see responses to MWRECAP44, MWRECAP46, MWRECAP85 and MWRECAP89.</p>	<p>Welcome this amendment.</p> <p>However no mention is made of the suggestion for the electronic version of the SPD and that the Toolkit could be a separate document so as to make it easy to interactively complete the forms and submit them.</p> <p>Proposed Change The electronic version of the SPD should have the Toolkit as a separate document.</p>
Part 12 An integrated approach to waste management in flats and apartments	046	<p>It is a good section as it considers future development and encourages exemplar projects but is disjointed from the rest of the SPD. It does not sit well in this section of the SPD.</p> <p>Suggestion that it could be best put in as an appendix or it could be introduced as a separate section earlier in the document, e.g. previous to section 10.</p>	<p>This section should be placed either as an appendix to the SPD or before section 10.</p>	<p>Agree –It is proposed to make the RECAP Waste Management Design Toolkit more prominent and to make Part 10 an appendix to the Design Guide. Therefore as a consequence of these changes this section will come before Part 10 of the Guide.</p>	<p>Please see responses to MWRECAP28, MWRECAP43, MWRECAP44 and MWRECAP85.</p>	<p>Welcome amendment to SPD.</p> <p>The use of practical examples within the SPD is good and more would be welcomed by South Cambs to show developers how waste facilities can be planned into a new development. Further examples should be added to the section on case studies – section 12 of the draft SPD</p>

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						<p>Could an example be added of how within a new residential development waste bin areas have been successfully included within the overall design? And a photograph and /or a design layout of the scheme would be beneficial.</p> <p>Proposed change Increase the number of best practice examples with illustrations of waste facilities being planned for within new developments especially residential success stories in section 12 Case Studies.</p>

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Household Recycling Centre information from draft SPD.

Table 8.1 - Developer contributions for the provision of Cambridgeshire Household Recycling Centres by Service area (Edited to show those for South Cambs)

Service area	HRC Catchment area (District electoral wards)
Bluntisham HRC	<p>Within Huntingdonshire District: Earith, Fenstanton, Somersham, St Ives (East, South, West), The Hemingfords, Warboys and Bury</p> <p>Within South Cambridgeshire District: Papworth and Elsworth</p>
Cambridge and Northstowe HRCs	<p>Cambridge City administrative area</p> <p>Within East Cambridgeshire District: Bottisham, Burwell, Cheveley, Dullingham villages, The Swaffhams</p> <p>Within South Cambridgeshire District: Balsham, Bar Hill, Barton, Caldecote, Comberton, Cottenham, Fulbourn, Girton, Hardwick, Harston and Hauxton, Histon and Impington, Longstanton, Milton, Northstowe, Swavesey, Teversham, The Shelfords and Stapleford, The Wilbrahams, Waterbeach, Willingham and Over.</p>
St Neots HRC	<p>Within Huntingdonshire District: Buckden, Gransden and the Offords, Kimbolton and Staughford, Little Paxford, St Neots (Eaton Ford, Eaton Socon, Eynesbury, Priory Park)</p> <p>Within South Cambridgeshire District Bourn and Gamlingay</p>
Thriplow HRC	<p>Within South Cambridgeshire District: Bassingbourn, Duxford, Fowlmere and Foxton, Haslingfield and the Eversdens, Linton, Melbourn, Meldreth, Orwell and Barrington, Sawston, The Abingtons, The Mordens, Whittlesford.</p>

There is also detailed information about how to calculate the financial contributions expected

Table 8.2 Methodology for determining financial contributions

Any Site		Source
1 sites or site improvement x £x million	= £x million infrastructure costs	Cost per site sourced from independent assessment of site costs.
total catchment	= y households (all	WMT Recycling Centre

households	households in catchment e.g. existing and new)	Catchment Tables Latest CCC Dwelling Figures
new households	= z new households within catchment	Latest Cambridgeshire Housing trajectory figures
<p>Total developer contribution towards Recycling Centre Infrastructure =</p> <p style="text-align: center;">Infrastructure costs X New households in catchment</p> <p>Total No. households in catchment (e.g. existing and new)</p> <p style="text-align: center;">$\frac{\pounds x}{y} \quad \times \quad z \quad = \quad \pounds a$</p> <p>Total developer contribution per household = $\frac{\pounds a}{z}$</p>		

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Northstowe and New Communities Portfolio Holder 20 September 2011
AUTHOR/S: Executive Director (Operational Services) / Corporate Manager (Planning and New Communities)

**RESPONSE TO CONSULTATION ON THE
DRAFT NATIONAL PLANNING POLICY FRAMEWORK****Purpose**

1. To agree the Council's response to the Government's consultation on the draft National Planning Policy Framework.
2. This is not a key decision because it is responding to a consultation. It has not been published in the Forward Plan.

Recommendations

3. That the Portfolio Holder agrees the response to the Government's consultation on the draft national Planning Policy Statement as set out in Appendix A.

Reasons for Recommendations

4. To set out the Council's views on the draft National Planning Policy Framework as it affects South Cambridgeshire and seek revisions to the draft Framework to reflect those concerns before it is published.

Background

5. The National Planning Policy Framework is a key part of the Government's reforms of the planning system. Currently Government planning policy takes the form of Planning Policy Statements, Planning Policy Guidance notes, and planning circulars, which amount to over 1000 pages. The Government has stated its intention to make the planning system less complex and more accessible, and to promote sustainable growth. They propose to replace the existing guidance with a single document.
6. The National Planning Policy Framework will have the same status as the current Government Policy documents. The provisions of the Planning and Compulsory Purchase Act 2004 already cover the status of national planning policy in plan preparation and decision-making. That is to say that local plans, which need to be in conformity with national planning policy, are the main consideration in determining planning applications unless superseded by a more up to date national planning policy document.
7. The draft National Planning Policy Framework, along with an Impact Assessment, was published on 25 July 2011, for a 12 week consultation ending on 17 October 2011. A brief summary of the approach contained in the draft Framework is as follows.

Presumption in Favour of Sustainable Development

8. The Draft NPPF proposes a strong presumption in favour of sustainable development. Local planning authorities should plan positively for new development, and significant weight should be placed on the need to support economic growth through the planning system. Where local plans are not up to date or are not clear on a particular issue, development should be allowed unless adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the draft framework.

Plan Making

9. The planning system remains 'plan led', with succinct local plans setting out a positive long-term vision for the area, which should be kept up to date. Each Local Planning Authority should produce a local plan for its area. Any additional development plan documents should only be produced where clearly justified, and supplementary planning documents should only be necessary where they help bring forward sustainable development at an accelerated rate.
10. Local plans should plan positively for the development and infrastructure required in the area. They should meet objectively assessed development needs, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
11. Local Plans must be based on adequate, up-to-date, relevant and proportionate evidence, addressing the range of economic, environmental and social issues to be addressed by the plan. They will also be required to demonstrate they have considered cross boundary issues as part of the duty to cooperate. As part of the examination of local plans, Inspectors will be required to assess whether the plan has been prepared in accordance with the duty to cooperate, legal and procedural requirements, and whether it can be considered to be 'sound'. Four tests of soundness are proposed, which reflect the existing three tests but include a new first test. Plans must be:
 - Positively prepared;
 - Justified;
 - Effective;
 - Consistent with national policy.
12. When a Neighbourhood Plan is made, they must be in general conformity with the strategic policies of the Local Plan. Neighbourhoods will have the power to promote more development than is set out in the strategic policies of the Local Plan.

Development Management

13. In order to deliver sustainable development local planning authorities need to:
 - approach development management decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so;
 - attach significant weight to the benefits of economic and housing growth;

- influence development proposals to achieve quality outcomes; and
 - enable the delivery of sustainable development proposals.
14. The document also includes a succinct framework for the following land uses and planning issues structured around the three strands of sustainability. Much of the policy framework draws on the approach and content of existing Planning Policy Statements. However, there are some significant differences. Some of these are set out in the considerations section below. Others are addressed in the proposed response in Appendix A:
- Planning for prosperity
 - Business and economic development
 - Transport
 - Communications infrastructure
 - Minerals
 - Planning for people
 - Housing
 - Design
 - Sustainable communities
 - Green Belt
 - Planning for places
 - Climate change, flooding and coastal change
 - Natural environment
 - Historic environment

Considerations

15. The draft Framework represents a significant change in the approach to national planning policy and will have implications for the Council in performing its planning functions. The Government has sought views on its proposed Framework in the form of a series of questions in a questionnaire. Recommended responses to the consultation are set out in Appendix A. The key issues arising from the draft Framework for this Council are summarised below:

Presumption in favour of sustainable development

16. The general principle of streamlining national planning policy is understood and endorsed as a positive objective. It is important, however, that the resulting document provides an appropriate and sufficiently clear framework for planning. The principle of sustainable development as a cornerstone for planning is well established and is supported, as is the identification of the three aspects of sustainable development as needing to be pursued in an integrated way. However, there is a concern about the balance struck in the draft Framework between the economic role of planning and the social and environmental roles in the proposed presumption in favour of sustainable development.
17. The principle of supporting economic growth is endorsed. However, it is important that this should not be at any cost. The long term success and attractiveness of an area will be affected by the quality of the places created and the quality of the environment within and around them. South Cambridgeshire frequently performs well in quality of life surveys and business surveys and the quality of the built and natural environment are quoted as key reasons why people and businesses come to the area and to undermine that quality would also undermine the economic success.

18. It is disappointing that throughout the draft framework, the planning system is seen as an impediment to growth and its role as enabler and promoter is not properly recognised. The benefits of a plan led system are not fully recognised, and the pro-active role it can have in creating a vision and framework for positive future development to support local needs alongside the value attached locally by communities to their local environment.

Certificate of conformity for existing plans

19. The purpose and status of the proposed certificate of conformity is not clear and depending on the Government's intention, could be significant for this Council, in view of our suite of recently adopted Development Plan Documents. If there is any intention that weight should not be given to these plans if they are not consistent with the National Planning Policy Framework in any way, then this would be of significant concern and could create a policy void while new plans are prepared that accord with the Framework. DPDs have statutory status and are prepared under primary legislation, and the normal approach when new national guidance is published is for a balanced judgement to be made in the context of each planning application taking account of the adopted policy, any more recent national guidance and other material planning considerations. That usual approach is considered appropriate in the context of the Framework. If the certificate of conformity is to be pursued, its function and purpose should be clarified in the Framework in a way that does not undermine recently adopted plans and it should also be made clear that it is a certificate of 'general' conformity as has been the case in its previous use in plan making to demonstrate that a plan is consistent with the regional plan.

Level of detail and implications for Local Plans

20. The Government's approach in streamlining national planning policy is to give greater flexibility at the local level. This may have some benefits. However, many aspects of planning policy are based in sound professional principles that apply equally across the country and the approach to cover those points in national policy was to avoid each Council including very similar policies in their local plans and helping to streamline those. There is a risk that reducing detail in national policy to quite the extent in the draft NPPF will mean that some of the key detail lost from the national framework will need to be included in local plans in order to provide a clear and consistent framework for determining planning applications and give certainty to those seeking planning permission.

Allocate land for additional 20% housing provision

21. The requirement to provide at least 20% extra deliverable sites is not clear and is of concern. Whilst the aim to ensure delivery of housing is understood, it is not clear quite what is being proposed and whether the approach will achieve that objective. It is not clear whether it is intended that an additional allowance of 20% is for the first five year period, which is the bullet it is under, or intended to apply to the full housing target. If it is intended to apply to a rolling 5-year target, how does that take effect after the first 5-year period from the adoption of the plan? Even if the principle was accepted, there is no evidence that increases of 10% or 15% would not be sufficient to meet the objective. It seems to be an arbitrary figure that is likely to be resented by local communities, particularly in the context of the localism agenda. If the allowance is retained, clarification is needed.

22. This approach could result in the same amount of housing being built, but potentially not in the most sustainable locations, particularly at times of weak market conditions when there can often be a significant number of sites with planning permission where developers decide not to build, or to build at a slower rate. An arbitrary increase in the supply of land could also weaken the spatial aspect of Local Plans as developers will be able to concentrate house building on easier sites, which may not be the most sustainable. For example, delivery of large scale strategic sites, including urban extensions and new settlements, tend to have significant infrastructure requirements to allow development to commence, whilst smaller greenfield village sites could come forward more easily and may take up much of market demand at the expense of bringing forward strategic sites. An increase in local land supply will not necessarily lead to increased numbers of housing units being constructed unless the market can support them and housebuilders release them.

Protection of the natural environment

23. The NPPF includes the objective to minimise adverse effects on the local and natural environment in preparing plans to meet development requirements and to allocate land with least environmental or amenity value 'where practical'. The emphasis here, as in a number of places in the Framework, appears to go too far in the direction of supporting development, which could be to the detriment of environmental quality and therefore would not meet the three strands of sustainable development and could ultimately harm the quality of the District which in turn could undermine its economic success.
24. Of particular concern is that there is no reference in the draft Framework to landscape character. The only reference to protecting landscape is for the national designations of National Parks and Areas of Outstanding Natural Beauty. The only reference to enhancing landscapes is in coastal areas. The framework does not address the protection of the countryside for its own sake. Landscape, its character and qualities, and what it can bring to sustainable development, is not mentioned at all. There is also a focus on protected and designated sites. This is a significant concern in a predominantly rural district where the local community lays great store by the environmental quality of the area, for which landscape plays a crucial part.

Relationship with draft Travellers PPS

25. The Council has responded to the consultation on the draft Planning for Travellers PPS, which is of a very different style and includes a greater level of detail than the draft Framework. It is not clear how Government intends that it be incorporated into the Framework. To reflect the style of the NPPF, the planning for travellers policies would require significant shortening. The preference would be for national policy on travellers to be included in the NPPF and not be adopted as a PPS, and for there to be an additional focused consultation on the proposed wording for inclusion in the NPPF. Reflecting SCDC comments, any NPPF policies regarding planning for travellers should include greater flexibility to take account of the difficulties identifying deliverable sites, particularly in areas which have a high level of need, the difficulties in establishing robustly the longer-term need for travellers sites, and the need for cooperation to address need strategically over a wider than district area.

Options

26. This consultation has generated a significant level of interest and many other organisations and bodies will be responding to the consultation. The Council could decide not to respond to the consultation. However, this is a very important document that will have significant implications to the Council in the operation of its planning functions and a response is recommended, particularly focusing on the issues with potentially greatest impact on the Council in its planning function.

Implications

27.	Financial	No direct effects. The emphasis on preparing single local plans is consistent with the Council's planned approach to its LDF review which will have considerable savings.
	Legal	No direct effects, subject to clear national policy for local planning decisions.
	Staffing	None.
	Risk Management	None.
	Equality and Diversity	The Council will undertake Assessments of the plans required to be prepared.
	Equality Impact Assessment completed	No
	Climate Change	The draft Framework includes policy on climate change that will guide local policies and decisions.

Consultations

28. There has been consultation with officers across the service and the Council covering the issues raised in the draft Framework.

Consultation with Children and Young People

29. As a Council response to a Government consultation on a technical and strategic document, it is not appropriate to consult directly with children and young people.

Effect on Strategic Aims

30. The draft Framework has the following effects on the Council's Strategic Aims:
- AIM A - We are committed to being a listening council, providing first class services accessible to all – the draft NPPF provides a broad framework within which the Council can prepared its local plan in consultation with local communities
 - AIM B - we are committed to ensuring that South Cambridgeshire continues to be a safe and healthy place for you and your family – the draft NPPF aims to secure sustainable development that plans for the needs of people and places
 - AIM C - we are committed to making South Cambridgeshire a place in which residents can feel proud to live – as Aim A
 - AIM D - We are committed to assisting provision for local jobs for you and your family – the draft NPPF has economic prosperity at its heart
 - AIM E - We are committed to providing a voice for rural life – as Aim A.

Conclusions / Summary

31. The draft National Planning Policy Framework will have implications for the Council in its planning functions. Whilst the principle of a streamlined approach to national policy is welcomed, there are concerns at the level of detail in some areas and the approach taken on some aspects of planning policy. A proposed response to Government is contained in Appendix A.

Background Papers: the following background papers were used in preparing this report:

Draft National Planning Policy Framework: Department for Communities and Local Government (July 2011)

<http://www.communities.gov.uk/publications/planningandbuilding/draftframework>

Contact Officer: Caroline Hunt – Local Development Framework Team Leader
Telephone: (01954) 713196

Appendix A

National Planning Policy Framework

Consultation questions

We are seeking your views on the following questions on the Government's proposal for a new National Planning Policy Framework.

Email responses to: planningframework@communities.gsi.gov.uk

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

Zone 1/H6, Eland House,

Bressenden Place

London

SW1E 5DU

(a) About you

(i) Your details

Name:	Keith Miles
Position:	Planning Policy Manager
Name of organisation (if applicable):	South Cambridgeshire District Council
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Email Address:	keith.miles@scambs.gov.uk
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(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response

Personal views

¹ (see: <http://www.communities.gov.uk/publications/planningandbuilding/draftframeworkconsultation>)

(iii) Are your views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group.

Yes

No

Name of group:

(iv) Please tick the *one* box which best describes you or your organisation:

Private developer or house builder

Housing association or RSL

Land owner

Voluntary sector or charitable organisation

Business, consultant, professional advisor

National representative body

Professional body

Parish council

Local government (i.e. district, borough, county, unitary,etc.)

Other public body (please state)

Other (please state)

(v) Would you be happy for us to contact you again in relation to this consultation?

Yes

No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

(b) Consultation questions

Delivering Sustainable Development

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

1(a) – Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

1(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 11: The general principle of streamlining national planning policy is understood and endorsed as a positive objective. It is important, however, that the resulting document provides an appropriate and sufficiently clear framework for planning.

The principle of sustainable development as a cornerstone for planning is well established and is supported, as is the identification of the three aspects of sustainable development as needing to be pursued in an integrated way. However, there is a concern about the balance struck between the economic role of planning and the social and environmental roles.

It is disappointing that throughout the draft framework, the planning system is seen as an impediment to growth and its role as enabler and promoter is not properly recognised. The benefits of a plan led system are not fully recognised and the pro-active role it can have in creating a vision and framework for positive future development to support local needs alongside the value attached locally by communities to their local environment.

Paragraph 13: The principle of supporting economic growth is endorsed. However, this must not be at any cost. The long term success and attractiveness of an area will be affected by the quality of the places created and the quality of the environment within and around them. South Cambridgeshire frequently performs well in quality of life surveys and business surveys and the quality of the built and natural environment are quoted as key reasons why people and businesses come to the area and to undermine that quality would also undermine the

economic success.

Paragraph 14: The draft framework says that new development should be planned for positively and all individual proposals approved wherever possible “unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits” (repeated at paragraph 20).

Whilst the principle of planning positively for development is supported, it is important to realise that planning has always been about balancing the benefits and adverse impacts of development. The weight to be given to the adverse impacts of development seems to now be reduced, potentially to the point that unsuitable development could be approved that would have detrimental impacts on the environment and communities over the long term. Whilst the Framework says that local plans should include policies that will guide how the presumption will be applied locally, there is concern that local planning authorities’ ability to refuse such development would be reduced or that refusal could be overturned on appeal. This would not be in keeping with the ideals of the localism agenda.

The statement that permission should be granted where “the plan is absent, silent, indeterminate or where relevant policies are out of date” is of particular concern, especially when read with paragraph 26 relating to the definition of up-to-date plans and the need for a certificate of conformity. There is a concern that a policy vacuum could be created, even in areas with relatively up to date plans. This issue is addressed in full in response to Question 2 on plan making.

Paragraph 19: The 5th bullet says that ‘where practical and consistent with other objectives, allocations of land for development should prefer land of lesser environmental value’. It is accepted that there can occasionally be exceptional circumstances where land of environmental value may be identified for development for wider benefits, however, the emphasis here appears to go too far in the other direction which could be to the detriment of environmental quality.

The core planning principles make no reference to the role of planning for the built environment in relation to adapting to climate change, and indeed the only reference to climate change relates to the encouragement of renewable energy. This does not reflect the significant role that planning has to play in responding to the challenges of climate change and helping to meet national targets for carbon reduction. The Council suggests that an additional bullet point be included as follows:

- “planning policies and decisions should take account of

the need for new development to be planned to adapt to the opportunities and impacts arising from changes in the climate.”

Plan-making

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

2(a) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

2(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 20: The Framework repeats the statement from the previous section that development needs should be met unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This emphasis is of concern. See comments under question 1 on sustainable development.

Paragraph 21: The guidance to prepare a single Local Plan for an area is welcomed, along with the clarification that additional DPDs can be prepared but that they should only be used where clearly justified.

The draft NPPF states that Supplementary Planning Documents (SPD) should not be used “to add to the financial burden on development”. SPDs can speed up development by clarifying how the Council will apply development plan policies, providing greater certainty to developers, and a level of detail that would not be appropriate in a local plan. It is not clear how this would add to the financial burden.

Paragraph 26: Whilst the continuation of the plan led system is noted and supported, the lack of clarity in the wording of the Framework in respect of a proposed new certificate of conformity for adopted plans is a cause for concern.

The paragraph states, ‘In the absence of an up-to-date and consistent plan, planning applications should be determined in accord with this Framework, including its presumption in favour of sustainable development. It will be open to local planning authorities to seek a certificate of conformity with the Framework’?

Adopted plans have statutory weight under legislation and it is assumed that will continue to be the case until they are superseded. It is not clear what the purpose of a certificate of conformity is intended to be or how the Government expects it to be used. Is it intended to be a form of ‘quality assurance’ to confirm that existing adopted plans are up to date and broadly consistent with the Framework (maybe highlighting is there are specific areas where it is not), or is it intended to imply that existing plans should have no weight if they are not in conformity with the new Framework.

This is a new use of a certificate of conformity. Their usual function is at the time a new local plan is being prepared to provide evidence for the examination Inspector that a draft plan is in ‘general conformity’ with higher order policies, before a new statutory plan is adopted. The proposed new ‘conformity’ is to identify whether a statutory plan is consistent with new national policy. It is not clear to what extent a plan would need to be in conformity with the Framework to secure such a

statement and what status a statement of conformity is anticipated to have in the planning process compared with a statutory plan. As the draft Framework includes new requirements, eg. an additional 20% housing provision above identified needs, it seems high unlikely that many plans will be able to secure a statement of conformity, even if adopted very recently. This seems at odds with the Government's desire for local planning authorities to have pressed ahead with plan making.

It would be highly undesirable for this approach to render otherwise up to date plans unusable for development management purposes. The issue of more up to date national policy is normally addressed by making an assessment on a case by case basis of a proposal against the statutory plan and any more recent material considerations, including national policy, and a balanced view reached on whether planning permission should be granted. Continuing with this approach would have the advantage of not undermining the status of current statutory plans and the policies contained in them, unless they conflict in a particular respect with the new national framework. Even under circumstances where there is a significant conflict with a particular aspect of national policy, eg. a local planning authority is not able to demonstrate a 5-year supply of housing land, if there is a current adopted LDF that sets a clear development strategy and a sound set of policies for considering development proposals, it would be counter productive to say the LDF was out of date and that relevant policies should not be given full weight in planning decisions. There is also a question of how Government intends to resource assessing existing plans and issuing certificates of conformity and the delay and uncertainty that could build into the process. Depending on the process envisaged, this could in itself have resource implications whilst LPAs should be focusing on creating new Local Plans.

South Cambridgeshire District Council has taken its plan making responsibilities seriously and has a suite of Local Development Framework Documents, all adopted within the last four years. This created a development strategy designed to facilitate significant growth reflecting a strategy developed with partners across the sub region for the period to 2016 and beyond. The Council has already embarked on a review of the plans to role together separate DPDs into a single Local Plan to take the strategy forward to 2031. However, even with an ambitious programme for completing the plan, it is not anticipated that it will be adopted until the end of 2014. It is of significant concern to the Council that the Government's approach could mean the carefully developed growth strategy is undermined, or even lost, creating a policy vacuum.

If the certificate of conformity is to be pursued, its function and purpose should be clarified in the Framework in a way that does not undermine recently adopted plans and it should also be made clear that it is a certificate of 'general' conformity (which is the phrase used at paragraph 50 for neighbourhood plans).

Paragraphs 28 and 30: Whilst the principle of identifying and planning to meet the needs identified for housing and economic development (including retail and leisure) is supported, the draft NPPF makes no recognition that there may be cases where that need cannot appropriately be met where it arises due to significant constraints and in these cases a balance may need to be struck. That could include working through the duty to cooperate to explore provision of part of the need outside the district, or it could mean that need is not fully met, because to do so would threaten the success of existing areas.

It is noted that paragraph 28 refers to local planning authorities catering for 'housing demand and the scale of housing supply necessary to meet this demand'. It is agreed that it is generally appropriate to plan to meet the needs identified in a Strategic Housing Market Assessment, subject to the point made above. It is not clear whether the reference to housing demand is intended to refer to the need identified in the SHMA or whether it is some other assessment. It would be of concern if it were the latter.

Paragraph 39: The emphasis on ensuring that the scale of obligations and policy burdens on development is not such that the ability for sites to be developed viably is threatened is understood. However, this should be balanced with a requirement that all development provides appropriately for its needs. There may be policy areas and aspirations where there can be more flexibility, particularly in times of economic difficulty, but it is important that all development meets all its needs in order to be successful developments over the long term. It would be helpful if this was made clear.

Paragraph 48: The new soundness test that plans have been 'positively prepared' is agreed in principle and is consistent with this Council's approach to planning positively to support the success of the Cambridge economy and to accommodating significant levels of growth, including needs that could not be fully met in adjoining districts, or where the development strategy for the sub region supported a particular spatial approach. Notwithstanding that positive approach in the past, the inclusion of the statement that objectively assessed requirements would include 'unmet requirements from neighbouring authorities where it is practical to do so', is of concern as written. There is no obligation made on the district within which the need is identified to demonstrate that it has

taken all reasonable steps to meet its own needs. This puts an unreasonable emphasis on an authority to have to accommodate unmet needs from an adjoining Council's area even if that Council has not taken all reasonable steps to meet its own needs, and could lead to conflict between Councils, rather than an even handed duty to cooperate engaged in positively by all parties.

The existing soundness test that a plan must be 'Justified' in PPS12 referred to the need for robust and credible evidence base for core strategies (Paragraph 4.36 of PPS12) whilst the second bullet point of the Framework only refers to proportionate evidence (paragraph 48). Whilst the inclusion of proportionate evidence is welcomed in the interests of efficiency and best use of public sector resources, it remains important that the evidence base is also robust and credible if, for example, objectively assessed needs are to be relied on to support particular levels of development.

The final soundness test, requiring consistency with national policy, states that delivery of sustainable development should be in accordance with the 'policies' in the Framework. The draft Framework does not clearly indicate what the policies are in the document and which areas of text are merely supporting text. PPS4 and PPS5 and draft PPS on Planning for traveller sites are examples of recent national guidance produced in this style. If the term 'policies' is to be used in the soundness test, it needs to be clear which parts of the Framework are policies.

Paragraph 50: Neighbourhood plans are required to be in 'general conformity with the strategic policies of the Local Plan'. There is a lack of clarity as to what are the strategic policies that a neighbourhood plan must be in conformity with. For example, if strategic policies set a settlement hierarchy and a scale of development appropriate in different categories of settlement, would it be in general conformity to propose a materially/significantly greater level of development in a neighbourhood plan? Could that development extend into open countryside outside settlement frameworks? What about being in the Green Belt or proposing a change to a Green Belt boundary?

Note: Comments on individual land uses are given under the relevant questions.

The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

2(c) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

2(d) Do you have comments? (please begin with relevant paragraph number)

Paragraph 44: The Council supports the principle of cross boundary cooperation, and has demonstrated this successfully through strategic planning and joint plan making.

However, it may not always be possible to reach agreement or consensus on cross boundary issues. It is not clear what approach will be taken where this is the case, for example how it would be addressed through examination of the development plan, particularly where plans may be at different stages of preparation.

Paragraph 48: See also response to question 2 on plan making.

Decision taking

In the policies on development management, the level of detail is appropriate.

3(a) Do you agree

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

3(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 62: The Government's approach in streamlining national planning policy is to give greater flexibility at the local level. This may have some benefits, however, many aspects of planning policy are based in sound professional principles that

apply equally across the country and the approach to cover those points in national policy was to avoid each Council including very similar policies in their local plans and helping to streamline those. There is a risk that reducing detail in the Framework to quite the extent in the draft will mean that some of the key detail lost from the national framework will need to be included in local plans in order to provide a clear and consistent framework for determining planning applications and give certainty to those seeking planning permission.

Whilst the system remains plan led, the NPPF refers only to Local Plans and Neighbourhood plans. There is no specific mention of existing Local Development Framework Documents. As there are no major changes proposed to the Local Development Framework system, albeit a new emphasis on preparing single plans unless there are good reasons to have separate plans, all existing adopted plans will and should remain in place whilst new Local Plans are prepared that respond to the national Framework. South Cambridgeshire District Council has a set of Local Development Framework Documents, all adopted with the last four years. It should therefore be made explicit that the term Local Plans includes existing adopted Development Plan Documents. See also response to question 2, paragraph 26 on certificate of conformity.

Paragraph 70: The draft NPPF states that LPAs should avoid unnecessary conditions or obligations, particularly where this would undermine the viability of development proposals. This could have the unfortunate consequence of valuing development over environmental and social issues that should be addressed through mitigation. The tests for conditions outlined in paragraph 69 already requires that 'they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.'

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

4(a) Do you agree

- Strongly agree
- Agree
- Neither agree or Disagree

- Disagree
- Strongly Disagree

4(b) What should any separate guidance cover and who is best placed to provide it?

Whilst simplifying and streamlining national policy guidance is supported, there is a danger that issues for which there is a common approach that is generally accepted across the planning profession that are not addressed at the national level, will need to be addressed at the local level in Local Plans resulting in longer plans.

Local Development Frameworks aim to avoid repeating national guidance in PPS/PPG and have been advised to take this approach. Whilst key issues are now generally addressed at a headline level in the draft Framework, there may be a need for further detail on how policies will be operated and more specific guidance for determining planning applications. As well as requiring each local planning authority to address such issues individually and thereby adding to workloads, this could also create inconsistency between LPA's which actually makes the development process more complex for developers operating across many locations. Some policy areas would therefore benefit from being addressed in further detail.

If guidance is produced by organisations outside government, its status and the weight that should be attached to it would need to be made clear.

Business and economic development

The 'planning for business policies' will encourage economic activity and give business the certainty and confidence to invest.

5(a) Do you agree?

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

5(b) Do you have comments? (please begin with relevant paragraph number)

The Council strongly supports the role of planning in meeting

the development needs of businesses, and also supporting the rural economy.

Paragraph 75 of the draft framework states that “Planning policies should avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses.’

The Council has raised its concerns regarding proposed amendments to the General Permitted Development Order to allow change of use from employment to residential in response to the recent consultation. The local plan may need to identify areas which should be retained for employment use, for the benefit of achieving the development strategy of the plan, achieving sustainable development and providing certainty to employers and developers. Without it, the ability to identify employment land to deliver jobs in appropriate locations could be undermined, threatening the whole strategy.

Local Plans will be subject to regular review, and this provides an opportunity to consider whether policies or land allocations remain appropriate.

5(c) What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?

Planning can be informed by market signals but they should be considered alongside other evidence. Planning needs to consider wider issues than the market in order to achieve sustainable development to meet local needs over the long term. For example, matters such as demographics and housing need, and the value attached by local communities to factors such as open space, local amenity and the countryside are also relevant. Some market signals can change too quickly to be relevant to plan making, and plans need to address the whole economic cycle.

The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.

6(a) Do you agree?

Strongly agree

- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

6(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 76: The continuation of a sequential approach to retail development is supported.

Paragraph 76 also states that, 'It is important that retail and leisure needs are met in full and are not compromised by limited site availability.' As highlighted in our response to question 2, the requirement to plan to meet the needs identified for housing and economic development (including retail and leisure) makes no recognition that there may be cases where that need cannot appropriately be met where it arises due to significant constraints and in these cases a balance may need to be struck.

There is no guidance about how the sequential test or testing will be applied, reducing certainty to LPAs and developers (see question 4)

Transport

The policy on planning for transport takes the right approach.

7(a) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

7(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 83: The emphasis on sustainable transport is supported. However, the NPPF seeks to “where practical, encourage” and “where reasonable to do so” which are not considered strong enough phrases to ensure meaningful reductions in greenhouse gas emissions from transport. There

may be circumstances where achieving high levels of transport use in modes other than the car is not possible, such as for small scale development in rural areas, including development that may come forward under neighbourhood plans, but for larger scale development, which would significantly impact on sustainability, the aim must be to achieve sustainable patterns of development and sustainable transport modes and the caveats will make it more difficult to secure this.

Paragraph 85: The requirement for Transport Statements or Assessments to support all developments that generate significant amounts of movement remains sound. However, it also states that “development should not be prevented or refused on transport grounds unless the residual impacts of development are severe”. The term ‘severe’ is not defined. Does this also consider the potential for cumulative impacts?

Paragraph 89: It is disappointing that the list of issues regarding site design does not include cycle parking.

Communications infrastructure

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

8(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

8(b) Do you have comments? (please begin with relevant paragraph number)

Policies regarding Telecommunications continue to seek to keep the number of masts to a minimum, including seeking use of exiting masts and buildings before a new mast could be justified.

PPG8 referred directly to new masts being inappropriate development in the Green Belt, requiring special circumstances, including a lack of alternatives, to outweigh the

harm. That point should be included in the Framework.

Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

9(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 101: The draft framework should make reference to the role of Minerals and Waste Planning Authorities, who in many cases carry out this function; not the local planning authority.

Paragraph 102: The 6th bullet point of this paragraph refers to environmental criteria being applied to minerals planning applications to avoid adverse effects on the natural and historic environment and human health. These impacts should also be considered through plan making.

Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

10(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

10(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 109 - 1st bullet: The statement that local planning authorities should ensure that their Local Plan 'meets the full requirements for market and affordable housing in the housing market area' is understood and a sound aspiration. In terms of market housing provision, there may be circumstances where it is not possible or appropriate to meet needs in full within a district due to other factors (see response to question 2, paragraphs 28 and 30). In terms of affordable housing, in areas of high house prices and considerable housing need, it is simply not possible to ensure that affordable housing needs are met in full with a reasonable and deliverable affordable housing target. It is not reasonable for the Framework to expect that affordable housing needs can be fully met under the existing system in all parts of the country through the planning system.

Paragraph 109 - 2nd bullet: The requirement to provide at least 20% extra deliverable sites is not clear and is of concern. Whilst the aim to ensure delivery of housing is understood, it is not clear quite what is being proposed and whether the approach will achieve that objective. It is not clear whether it is intended that an additional allowance of 20% is for the first five year period, which is the bullet it is under, or intended to apply to the full housing target. If it is intended to apply to a rolling 5-year target, how does that take effect after the first 5-year period from the adoption of the plan? Even if the principle was accepted, there is no evidence that increases of 10% or 15% would not be sufficient to meet the objective. It seems to be an arbitrary figure that is likely to be resented by local communities, particularly in the context of the localism agenda. If the allowance is retained, clarification is needed.

This approach could result in the same amount of housing being built, but potentially not in the most sustainable locations, particularly at times of weak market conditions when there can often be a significant number of sites with planning permission where developers decide not to build, or to build at a slower rate. An arbitrary increase in the supply of land could also weaken the spatial aspect of Local Plans as developers will be able to concentrate house building on easier sites, which may not be the most sustainable. For example, delivery of large scale strategic sites, including urban extensions and new settlements, tend to have significant infrastructure requirements to allow development to commence, whilst smaller greenfield village sites could come forward more easily and may take up much of market demand at the expense of bringing forward strategic sites. An increase in local land supply will not necessarily lead to increased numbers of housing units being constructed unless the market can support them and housebuilders release them.

An arbitrary increase in the supply of land could also weaken the spatial aspect of Local Plans as developers will be able to concentrate house building on easier sites, which may not be the most sustainable. For example, delivery of large scale strategic sites, including urban extensions and new settlements, tend to have significant infrastructure requirements to allow development to commence, whilst smaller greenfield village sites could come forward more easily and may take up much of market demand at the expense of bringing forward strategic sites. An increase in local land supply will not necessarily lead to increased numbers of housing units being constructed unless the market can support them and housebuilders release them.

Paragraph 109 – 7th bullet: The Council supports the policy of bringing back into use empty homes. However, this is a role for Councils in a broader sense, including its housing functions, than specifically in their role as local planning authority as indicated at the beginning of the paragraph, particularly in terms of compulsory purchase of empty homes.

Paragraph 111 – 3rd bullet: There is no specific reference to including a target for affordable housing in plans. It is assumed that setting policies to meet identified need for affordable housing includes the setting of a target, but clarification would be helpful.

Paragraph 112: There is no reference to exceptions sites for affordable housing, which appears to be replaced by a policy to allow some market housing to facilitate the provision of significant affordable housing to meet local needs. This is assumed to be a replacement for rural exceptions sites. If the intention is that a small amount of market housing could be permitted on sites where housing would not otherwise be permitted to cross fund the maximum amount of affordable housing possible, this should be made clear. This is an approach that Councils have firmly resisted over many years. It is assumed this is being proposed as a means of funding and delivering more affordable housing in rural areas. If pursued, great care will need to be taken that it does not become a means of securing market housing on inappropriate sites with a token amount of affordable housing, or even the normal district target. It is also noted that the definition of local need contained in PPS3 has been lost, that rural exceptions sites 'should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection' (paragraph 30). One of the reasons for the success of the exceptions site policy locally has been that local communities have confidence that development is specifically to provide housing for people

living in that local community. This may affect the support for this type of provision. There is no indication that this might be an acceptable exception to inappropriate development in the Green Belt, which has been an important means of providing affordable housing to address local needs for communities lying in the Green Belt.

The statement that housing in rural areas should not be located in places distant from local services is an important principle in the interests of sustainable development and is welcomed, although it does not get the emphasis it deserves and seems rather an afterthought.

Paragraph 113 – 4th bullet: The inclusion as a special circumstance for isolated homes in the countryside as being where it is of exceptional quality or innovative design would be an extremely difficult policy to apply and could potentially result in a spate of sporadic development in the open countryside

Glossary – Affordable Housing, (page 53): It states that "Eligibility is determined with regard to local incomes and local house prices". This statement is misleading and can be open to interpretation. It is not clear whether it is referring to 'eligibility' of affordable housing or 'eligibility' of households for affordable housing. PPS3 says "Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices." This wording should remain.

Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

11(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 127: The NPPF should clarify what it means by school in this context. Presumably it is referring to state funded schools, as highlighted by the Secretary of State's policy statement of June 2011, rather than any form of school.

Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

12(b) Do you have comments? (please begin with relevant paragraph number)

The Design section seems to effectively capture the essence of good design and the prominence given to 'function' of places is welcome. It seems that much greater emphasis is being placed on ensuring that policies at the local level are robust and comprehensive. 'By Design', along with other 'good practice guidance' is mentioned specifically in PPS1 at Paragraph 37 and similar reference should be made in the Framework.

Paragraph 114: The importance of adaptable places,

previously included in PPS1 has been omitted from Paragraph 114 of the draft framework. The adaptability of buildings is an important consideration to ensure sustainable development can be delivered in the future and accordingly reference should be made to it in the guidance. In addition, specific statements in relation to disabled access previously stated in PPS1 have been removed. Reference to 'inclusive design' needs to be made. Reference needs to be made to the importance of high quality public realm somewhere in the draft guidance, as referred to in PPS3 at Paragraph 16.

Paragraph 116: This paragraph is crucial to the overall design guidance and covers, albeit at a high level, the key areas for design consideration. 3rd bullet should be amended to read: "respond to local context and character to understand the identity of local surroundings." Understanding context is absolutely crucial to effective and appropriate planning and is often an area that proposals fail to understand. Reference should also be made to 'context' and 'public realm' within these bullet points.

Overall, if good 'local' policies are in place then the design guidance provided by this draft framework will complement them well and certainly cuts down the overlap between PPS1 and PPS3. However, authorities without strong policies may well struggle to counter poorly designed schemes. With this in mind, the Council have made a series of suggested text changes to tighten the wording and accordingly the focus of the overall design guidance.

Paragraph 117: The Council notes that the use of design codes is favoured to "deliver high quality outcomes." Design coding is supported. It is not clear whether the draft framework is advocating that the Local Planning Authority produces design codes or the developer. If it is to be the Local Planning Authority, this will be another layer of guidance within the planning process and will impact on resources.

Paragraph 119: The Council proposes the first sentence refers to "architecture of individual and groups of buildings'. This would capture more complex schemes, the need to fit development into wider contexts and to highlight the importance of the complexities and interactions between buildings to hopefully capture the spaces between them.

Paragraph 121: Whilst the emphasis on securing high quality designs is welcome, the phrasing of the 2nd sentence suggests that permission should be given for development which is anything other than 'obviously poor design', which would be a low threshold that could allow mediocre projects to be

permitted and is not supported.

Green Belt

The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.

13(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

13(b) Do you have comments? (please begin with relevant paragraph number)

The continuation of Green Belt policy is welcomed.

Paragraph 145: The criteria contained in paragraph 3.8 of PPG2 setting out the circumstances under which the re-use of buildings inside a Green Belt is not inappropriate development would be a useful inclusion.

Paragraph 146: It is not clear what 'wider environmental benefits' will be needed to demonstrate very special circumstances. All renewable energy projects are likely to claim that they have wider environmental benefits.

Paragraph 147: Reference is made to "Community Forest" The term should be defined in the glossary.

Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

14(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |

Strongly Disagree

14(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 148: The approach to tackling climate change as outlined is welcomed. In order to secure the 'radical reductions in greenhouse gas emissions' sought it will be important that significant weight is given in plan policies and planning decisions to securing necessary measures in developments, particularly when balanced with other issues and in discussions over development viability.

Paragraph 150: It would be helpful to have clarity over what are considered "nationally described standards". It is assumed that this refers to the likes of the Code for Sustainable Homes and Building Research Establishment Environmental Assessment Method. It should be noted that no such comprehensive and focused delivery standards yet exist for climate change adaptation measures.

Paragraph 151: The direction of this approach would benefit from being broadened to include retrofit of energy efficiency and renewable energy technologies in relation to designated heritage assets. At present this is an area of considerable debate and one to which the NPPF could provide helpful clarity to achieve an environmentally sustainable balance.

Paragraph 154: The reference to avoiding "increased vulnerability to impacts arising from climate change" is helpful but this is a significantly underdeveloped area in which more specific policy, guidance and standards are urgently required. The NPPF is an opportunity to very firmly place climate change adaptation measures in the land-use planning portfolio. Additional content should be included that specifically references matters such as the avoidance of air conditioning, temperature tolerances, the importance of thermal mass, natural ventilation, shading, cool/reflective surfaces, fenestration, water conservation, subsidence and sustainable drainage systems.

The policy on renewable energy will support the delivery of renewable and low carbon energy.

14(c) Do you agree?

Strongly Agree

Agree

- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(d) Do you have comments? (please begin with relevant paragraph number)

The policy will help deliver renewable or low carbon energy.

Paragraph 152: It is not clear why 'deep geothermal energy' has been specifically referenced. Renewable Energy Strategies should seek to consider all technologies that would be suitable within each Local Planning Authority's area, and should evaluate each on their own merits.

Consideration should also be given to the addition of a bullet point related to the need for safeguarding of renewable and low carbon energy supplies and the avoidance of development that would have a detrimental impact on existing or planned renewable and low carbon energy infrastructure.

The helpful policy position outlined here would benefit from a strong reference to the very positive role that local planning processes can play in engaging communities with the benefits and advantages of renewable and low-carbon energy. Active engagement through these formal and consultative channels is an opportunity that should not be passed over.

The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities.

14(e) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input checked="" type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

14(f) Do you have comments? (please begin with relevant paragraph number)

No further comment.

The policy on flooding and coastal change provides the right level of protection.

14(g) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

14(h) Do you have comments? (please begin with relevant paragraph number)

Minimise vulnerability to climate change

Paragraph 154: The draft NPPF implies that the only potential impact of climate change, and therefore the only form of mitigation required, is flooding. Other issues are also relevant, including changing temperatures, increased pressure on water supply, and impacts on biodiversity, which all have the potential to be addressed by development proposals. Policy LCF5 of the draft Planning for a Low Carbon Future PPS could provide a useful starting point for this section.

Managing the risk of flooding and coastal change

Paragraphs 154 – 158: The NPPF addresses the key elements of planning and flood risk addressed by PPS25, and the key principles of applying the sequential and exception test. However PPS25 includes a much greater level of detail on how these tests should be applied, differences in their application to different types of development within different flood zones. This guidance is vital in order that a consistent approach managing flood risk is established, and to avoid the need for repetition in local guidance.

Paragraph 157: the wording, 'gives priority to sustainable drainage systems' is particularly disappointing given the requirements of the Flood and Water Management Act for their delivery, and the opportunities they present not only manage flood risk but to also create quality environments that will support and encourage economic development and contribute to improving the health and wellbeing.

Paragraph 157: The paragraph should refer to the role of the Environment Agency as a consultee on planning applications.

Natural and local Environment

Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.

15(a) Do you agree?

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

15(b) Do you have comments? (please begin with relevant paragraph number)

Paragraph 128: It is noted that the Framework reflects the general requirement of PPG17 to set local standards for open space based on assessments of need. The third sentence of this paragraph refers to planning policies identifying specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreation facilities. However, this will form part of the supporting evidence base for setting local standards, rather than the policy itself.

Paragraphs 130 to 132: The criteria for designation of a 'Local Green Space' (para 131) are unclear e.g. 'reasonably close' to population, 'demonstrably special' to the community, 'local' in character and 'not extensive'. There is also no guidance on what the very special circumstances would be to allow development on a site (para 130). There is reference in paragraph 132 to applying Green Belt policies, but they are very different designations, ie. Green Belts are a strategic designation with a specific spatial function including to prevent urban sprawl and coalescence of settlements, whilst Local Green Space is by definition a local policy and could presumably be within a settlement, adjoining it or detached from it and be an area valued by the local community which could be for a variety of reasons. It is also not clear how the designation would relate to other local designations such as local wildlife sites. It would benefit from further clarification.

Paragraph 165: The NPPF includes the objective to minimise adverse effects on the local and natural environment in preparing plans to meet development requirements and to allocate land with least environmental or amenity value 'where practical'. As set out in response to question 1 in respect of paragraph 19, the emphasis in a number of places in the Framework appears to go too far in the direction of

development, which could be to the detriment of environmental quality and therefore would not meet the three strands of sustainable development.

Paragraph 166: Further guidance on the criteria for judging proposals affecting protected wildlife sites or landscape areas would be helpful, to avoid the need for repetition at the local level, particularly in respect of international and national sites.

Paragraph 167: There is no reference in the NPPF to landscape character. The only reference to protecting landscape is for the national designations of National Parks and Areas of Outstanding Natural Beauty. The only reference to enhancing landscapes is in coastal areas. The framework does not address the protection of the countryside for its own sake. Landscape, its character and qualities and what it can bring to sustainable development, is not mentioned at all. There is also a focus on protected and designated sites. This is significant concern in a predominantly rural district where the local community lays great store by the environmental quality of the area, for which landscape plays a crucial part. There is also nothing in the draft NPPF about restricting development in the countryside outside settlements. The following paragraph from PPS7 key principle (iv) should be included in the Framework:

“New building development in the open countryside away from existing settlements, or outside areas allocated for development in development plans, should be strictly controlled; the Government’s overall aim is to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all.”

Paragraphs 168: This does not reflect the current approach in PPS 9, which at key principle 5vi states, ‘The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests’. The first approach to biodiversity conservation should be to avoid harm. Greater reference should also be made to the opportunity that planning provides to “restore” and “add” to biodiversity. There is no specific mention of the protection of species, which is addressed in paragraph 16 of PPS 9. It is welcomed that policies should identify and map local ecological networks.

Paragraph 169: The Framework should ensure that planning decisions are based on sound information, such as that provided by Local Environmental Records Centres.

Paragraphs 171, 172, 173, 174 and 175: The sections regarding pollution and instability provide a summary of the

existing approach provided by PPS23 and PPG24. However these also include well established practice guidance, providing consistency and certainty regarding how proposals will be tested and judged. Without additional guidance at the national level it will be necessary to provide additional guidance at the local level, which would be inefficient and deliver less certainty.

Historic Environment

This policy provides the right level of protection for heritage assets.

16(a) Do you agree?

- | | |
|---------------------------|-------------------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |
| Neither Agree or Disagree | <input type="checkbox"/> |
| Disagree | <input checked="" type="checkbox"/> |
| Strongly Disagree | <input type="checkbox"/> |

16(b) Do you have comments? (please begin with relevant paragraph number)

The Framework includes key passages from the recently adopted PPS 5 and there are benefits in the succinct format used. However, much of the structure/rationale of PPS 5 has been lost, along with criteria and tests, guidance such as how historic environment policy objectives should be weighed against other policy objectives, and helpful concepts such as optimum viable use. These issues would need to be addressed in supporting guidance.

Paragraph 178: It is not clear whether the strategy referred to is intended to form part of the Local Plan. This paragraph appears to have lost some of the strength of purpose of HE3.1 of PPS5.

Paragraph 179: It is recognised that conversation areas are designated under other legislation. However, the only paragraph about designation of conservation areas appears a negative statement about ensuring they are justified, rather than a positive statement regarding their role. There is nothing about designations of other heritage assets of local importance.

Paragraph 180: is largely based on HE6.1 of PPS 5, but the important requirement for an applicant to submit an impact assessment with the application given in HE6.2 has been lost.

Paragraph 183: does not contain a presumption in favour of preserving or conserving undesignated or designated heritage assets (as indicated in HE9.1 of PPS5) and should include the importance given to enhancement as well as conservation.

Paragraph 183: Although the draft framework deals with substantial harm being caused to a heritage asset, it fails to address harm to designated heritage assets which is less than substantial (as PPS 5 HE9.4).

Impact assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

No comment.

Planning for Travellers

18 Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

The Council's response to the 'Planning for Travellers' consultation should be considered when considering how the issues is addressed in the NPPF.

The style and nature of the draft Planning for Travellers PPS differs greatly from that of the draft NPPF. As an illustration, the NPPF addresses planning for housing in little under 1000 words, over three pages. The Planning for Travellers draft PPS includes over 2000 words, over eight pages. It included eight detailed criteria based policies. This is in complete contrast to the style of the NPPF, which sets objectives, and then a series of short policy statements.

The Council considers that the NPPF should address planning for travellers, but there is an opportunity to deliver the 'light touch guidance' that was originally promised. To reflect the style of the NPPF, the planning for travellers policies would require significant shortening.

The preference would be for national policy on travellers to be included in the NPPF and not be adopted as a PPS, and for there to be an additional focused consultation on the proposed wording for inclusion in the NPPF.

The Planning for Travellers PPS includes many detailed issues that could be addressed by local planning policies, and do not sit comfortably with the high level nature of the NPPF. In addition many principles that apply to all types of development are included in the NPPF, but repeated in the Planning for Travellers

PPS, such as achieving community involvement, developing a robust evidence base, protecting the environment, and green belt principles.

The Planning for Travellers PPS was designed to reflect wider housing policy, and the same principles are included in the housing and plan making sections of the NPPF. It could be made clear that, as another form of housing, many of the principles apply to Gypsy and Traveller and Travelling Showpeople sites. However, reflecting SCDC comments, any NPPF policies regarding planning for travellers should include greater flexibility to take account of the difficulties identifying deliverable sites, particularly in areas which have a high level of need, the difficulties in establishing robustly the longer-term need for travellers sites, and the need for cooperation to address need strategically over a wider than district area.

Specific questions on the impact assessment

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

QA5: What behavioural impact do you expect on the number of applications and appeals?

QA6: What do you think the impact will be on the above costs to applicants?

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

QB1.1: What impact do you think the presumption will have on:

- (i) the number of planning applications;
- (ii) the approval rate; and
- (iii) the speed of decision-making?

QB1.2: What impact, if any, do you think the presumption will have on:
(i) the overall costs of plan production incurred by local planning authorities?
(ii) engagement by business?
(iii) the number and type of neighbourhood plans produced?

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

QB2.2: Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

QB3.2: Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

QB4.1: What are the resource implications of the new approach to green infrastructure?

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

QB4.5 Will your approach to renewable energy change as a result of this policy?

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Northstowe and New Communities Portfolio Holder 20 September 2011
AUTHOR/S: Executive Director (Operational Services) / Corporate Manager (Planning and New Communities)

**PHASE 2 DETAILED WATER CYCLE STRATEGY TO 2031
MAJOR GROWTH AREAS IN AND AROUND CAMBRIDGE****Purpose**

1. The purpose of this report is to highlight the completion of the Phase 2 Water Cycle Strategy for the major growth areas in and around Cambridge, and its availability for use as an evidence base.

This is not a key decision, because it is reporting the findings of a study. It was first published in the April 2011 Forward Plan.

Recommendations

2. That the Portfolio Holder notes the completion of the Phase 2 Water Cycle Strategy for the major growth areas in and around Cambridge, and its availability as an evidence base to support planning decisions.

Reasons for Recommendations

3. The study provides information on water infrastructure, sustainable drainage, and water efficiency that can be utilised when planning for the existing major developments, and can be used as an evidence base for the South Cambridgeshire Development Plan.

Background

4. Water Cycle Strategies (WCS) are examinations of water supply capacity, wastewater infrastructure, surface water drainage and flood risk management. They are undertaken to ensure that new development can be supplied with water services infrastructure in a sustainable way.
5. Cambridgeshire Horizons commissioned the Water Cycle Strategy for the major growth areas around Cambridge. They also brought together a stakeholder steering group to guide the WCS. This comprises representatives from Cambridge City Council, South Cambridgeshire District Council, Cambridgeshire County Council, the Environment Agency, Anglian Water, Cambridge Water, Natural England and the Swavesey, Old West and Swaffham Internal Drainage Boards.
6. The WCS was developed over two phases: Scoping, Outline (Phase 1) and Detailed (Phase 2). The Phase 1 WCS for the Major Growth Sites in and around Cambridge was completed in September 2008 and identified the baseline infrastructure required to serve the proposed new development without detriment to the environment, in accordance with legislation at that time. This fulfilled the requirements of East of England Plan policy WAT2 which requires the timely provision of infrastructure for

water supply and waste water treatment through partnership working between key stakeholders. The Phase 1 WCS identified no insurmountable technical constraints to the proposed level of growth proposed in the East of England Plan and South Cambridgeshire LDF. The Phase 1 study can be found on Horizon's website.

7. The Phase 2 WCS was produced by consultants Halcrow Group Ltd. The Phase 2 WCS goes further than the Phase 1 study, by providing evidence in support of a more aspirational vision for water management. It aims to:
 - Aspire to water neutrality (the concept that the total water used after a new development is no more than the total water used before the development in a given wider area. This requires meeting the new demand through improving the efficiency of use of the existing water resources. This can be through making new development as water efficient as possible and retrofitting measures in existing development);
 - Improve biodiversity by protecting environmental water quality, and;
 - Protect and enhance the environment through sustainable surface water management.
8. The Phase 2 WCS sets out a long-term vision to:
 - Achieve the highest levels of water efficiency in all new homes – reducing current water consumption of 125 litres per head per day (l/h/d) to 80 l/h/d
 - Aim for water neutrality through the introduction of enhanced metering, variable tariffs and the introduction of water efficiency measures in the existing building stock
 - Aim for all surface water in new development to be managed above ground where feasible through Sustainable Drainage Systems (SuDS)
 - Improve water quality in surface water runoff from new developments
9. The strategy recognises that these are ambitious aims and barriers are identified as well as possible ways to overcome the difficulties. The strategy highlights that achieving the long-term vision will require continued collaborative working between partners on the steering group and full engagement with the local community.
10. It must be recognised that the Phase 2 WCS will have limited influence over the major development sites that have already progressed significantly through the planning system, such as the sites in the Southern Fringe, NIAB1 and Cambourne where planning permission has already been granted. However, that is not to say that these sites have not already made achievements in sustainable water infrastructure and there will also be further opportunities when determining reserved matters applications. The North West Cambridge Area Action Plan, which covers the University site, already has a progressive policy on water conservation, requiring that homes meet Code for Sustainable Homes Level 5. The greatest potential is at the strategic sites in the earlier stages of planning.
11. In addition to the policy recommendations a pathway to sustainable water management has been identified up to 2031. The Strategy has identified opportunities and barriers that need further consideration by a broad set of stakeholders including local authorities, government, water companies and government agencies (Environment Agency and Natural England) to help deliver a sustainable water environment suitable for our future.
12. Implementation of much of the Strategy will depend upon the plan making process, with principles to be tested through consultation before being adopted in development

plans. The Water Cycle Strategy provides a detailed evidence base regarding issues that will need to be explored through the review of the Local Development Framework.

13. It should be noted that the study was largely completed in 2010 and the Housing Trajectory and policy background reflect the situation as it was at that time. However, the evidence base created is available to use to assist the consideration of development proposals. It will also assist the development of policy regarding water infrastructure in the new South Cambridgeshire Local Plan.

Implications

14. Financial	There are no direct financial implications. The Study was commissioned by Cambridgeshire Horizons. To implement some of the aspirational objectives explored in the study could have cost implications, depending on how they were implemented.
Legal	None.
Staffing	There are no direct staffing implications arising from this report.
Risk Management	None.
Equality and Diversity	There are no direct equal opportunities arising from this report.
Equality Impact Assessment completed	No.
Climate Change	The WCS will provide an evidence base which will inform the development of policies towards more sustainable water services infrastructure.

Consultations

15. The Study was reported to the Cambridgeshire Horizons Board on 8th December 2010, and the Board agreed that the study was complete subject to outstanding stakeholder comments.
16. A draft of the Phase 2 study was reported to the New Communities Portfolio Holder Meeting on 14th December 2010. It was determined to advise Cambridgeshire Horizons that a number of issues should be addressed further in the document. These are repeated below, together with an update of how they have been addressed in the final report:
- Clarification regarding the timescales of implementing water efficiency standards and the impact on water neutrality and wastewater calculations. *Update: Clarification has been added to the study, highlighting where assumptions represent the maximum achievable efficiency, and actual additional water demand will depend upon the water efficiency achieved in the houses built.*
 - Provide more details and examples of water efficiency measures such as greywater and rainwater recycling, and explore practicalities, in particular in small development schemes. *Update: A number of examples are included in the study. New examples of highly water efficient developments are emerging all the time. There may be further opportunities to explore examples through future evidence to support implementation of high standards.*

- Provide more details and examples regarding the relationship between 100% above ground drainage SUDS and housing density. *Update: Due to the site specific nature of proposals, it has not been possible to explore generalities, but examples are included of where developments including extensive SUDS schemes have been implemented.*
- It would also be helpful for the WCS to explore examples of where high water efficiency policies or water neutrality have been achieved or explored elsewhere, and lessons learnt. *Update: A review of policy examples implemented elsewhere in the UK has been included as an appendix to the main report.*

Consultation with Children and Young People

17. None.

Effect on Strategic Aims

18. We are committed to making South Cambridgeshire a place in which residents can feel proud to live – The evidence base will support the Council in pursuing policies towards sustainable development and combating climate change.

Conclusions / Summary

19. The Phase 2 Water Cycle Strategy for the major growth areas in and around Cambridge has now been published by Cambridgeshire Horizons. The study provides information on water infrastructure, sustainable drainage, and water efficiency that can be utilised when planning for the existing major developments, and can be used an evidence base for the South Cambridgeshire Development Plan.

Background Papers: the following background papers were used in the preparation of this report:

The phase 2 Water Cycle Strategy can be viewed here:

http://www.cambridgeshirehorizons.co.uk/our_challenge/environment_sustainability/water_cycle_strategy.aspx

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Key Findings and Recommendations of the Water Cycle Strategy Phase 2 (as reported to the New Communities Portfolio Holder Meeting December 2010)

Water Resources (Chapter 3 of WCS)

1. The WCS suggests that under a business as usual scenario the new housing development across Cambridge Water's Water Resource Zone could increase the demand for water by 33% on 2006 levels by 2031 (based on Regional Spatial Strategy rates). The WCS highlights that Cambridge Water Company's Water Resources Management Plan, 2010 (WRMP10) forecasts a positive supply-demand balance to 2035. However, there are significant arguments for ensuring that new development minimises the increase in demand for water, particularly as Cambridgeshire is in an area of serious water stress (as defined by the Environment Agency) and future supply could be affected by climate change and changes to abstraction licences. Therefore to minimise increases in demand, an approach is needed which both ensures that new developments are built to the highest standards of water efficiency and implements measures in the existing housing stock to offset additional demand.
2. The WCS finds that there have been significant advances in improving water efficiency for those growth sites which have already progressed through the planning system. For example, the sites in the Southern Fringe and NIAB 1 will be built to Code 3 for market homes and Code 4 for affordable homes (both at 105 litres/head/day). Homes at the University site will be built to Code level 5 (80 l/h/d). By contrast water consumption in a typical existing home without any water efficiency measures is approximately 150 l/h/d and Building Regulations currently require 125 l/h/d. In looking forward to future developments, such as Northstowe and Cambridge East (if it comes forward), the strategy explores a number of measures to build on these achievements.
3. The WCS sets out a vision of achieving the highest levels of water efficiency in all new homes through implementation of Code for Sustainable Homes (CSH) Level 5/6 for water which is a consumption of 80 l/h/d. To achieve these higher levels, measures such as further efficiency in household taps, installation of smaller capacity baths and use of greywater recycling (GWR) or rainwater harvesting (RWH) will need to be implemented. GWR involves treating and re-using water from the shower, bath and sinks for uses such as flushing toilets. RWH involves capturing rain water that lands on the roof and storing it for later use. RWH has the added advantage of reducing the volume of water leaving a site and therefore reducing flood risk. The WCS looks at the costs of implementing these measures, the savings on water bills, the pros and cons of household versus community GWR/RWH and other implications such as the increase in energy and therefore carbon costs involved in pumping the water above mains water.
4. The WCS also considers how to achieve high levels of water efficiency in non-domestic buildings, measured by the BREEAM method (Building Research Establishment Environmental Assessment Method) using similar methods to those described above for housing.

5. The WCS has an aspiration to water neutrality, and considers measures in the existing housing stock such as metering, variable tariff structures depending upon levels of water consumption and retrofitting of water efficient measures. The costs and potential barriers to these methods are highlighted. The WCS finds that water neutrality may be achievable, but would be highly dependent on behavioural change among existing residents.
6. The WCS provides recommendations on potential planning policies and other strategies to work towards achieving the vision set out. These are obviously only recommendations and the Council will develop policies in the LDF following the plan making process and with principles to be tested through consultation before being adopted in development plans. The WCS will be an evidence base to be used in this process.

Sustainable Surface Water Management (Chapter 4 of WCS)

7. The WCS recognises the benefits of well designed surface water management infrastructure in the form of sustainable drainage systems (SuDS) over conventional piped below ground drainage systems. Above ground drainage has benefits in managing flood risk, reduced capital and operational costs, reduced carbon emissions (embodied and operational), enhanced water quality treatment and opportunities to integrate SuDS into amenity areas and enhance biodiversity.
8. The vision set out in the WCS is for 100% above ground drainage for all future developments where feasible, and that above ground drainage should include environmental enhancement and should provide amenity, social and recreational value.
9. The WCS finds that progress is being made with many of the strategic development sites providing balancing ponds and swales to manage surface water and improve biodiversity. In particular NIAB 1 allows for 100% above ground drainage through a network of 'green finger' swales. Uncertainty over adoption and long-term maintenance of these systems is highlighted as a concern. National Sustainable Drainage Standards will help address this.
10. The type of SuDS that can be successfully used in a development is dependent upon ground conditions at a particular site. Similarly an important factor in determining the feasibility of 100% above ground drainage will be the additional land take required. SuDS can either be integrated into public open space where possible or may result in an increase in housing densities. The WCS recognises that 100% above ground drainage would be difficult in planned high density developments or on constrained windfall development sites. However, developers should look at low land take drainage measures such as green roofs, permeable surfaces and water butts.
11. The WCS sets out policy recommendations for surface water management.

Environmental Water Quality (Chapter 5 of WCS)

12. The WCS sets out a vision to ensure that development does not cause deterioration of water quality and seeks opportunities to meet 'good' status (set out by the Water Framework Directive) where feasible. The main way in which to protect water quality in receiving watercourses and groundwater from surface water runoff is through a treatment train using SuDS. The WCS

follows the CIRIA SuDS Manual in recommending 1 treatment stage for roof runoff, 2 stages for residential roads, parking areas and commercial zones and 3 stages for refuse collection/industrial areas/loading bays/lorry parks/highways. It provides details of the types of SuDS that would be suitable in the treatment stages.

Wastewater (Chapter 6 of WCS)

13. With regards to wastewater the Phase 2 WCS provides a summary of the preferred wastewater strategy and an assessment of the impact of additional wastewater treatment discharges on water quality and flood risk. Anglian Water's preferred strategy is for all development in and around Cambridge to drain to Cambridge (Milton) waste water treatment works (WWTW), and for development at Northstowe and Cambourne to drain to Utton's Drove WWTW. An assessment of the implications of growth for water quality is provided; this shows that water quality should not be a constraint to growth at Cambridge WWTW or Utton's Drove WWTW.

Ecological Assessment (Chapter 7 of WCS)

14. The WCS provides an assessment of the consequences for the water environment of proposed development within and around Cambridge. This is intended to inform future Habitats Regulations Assessments for reviews of Local Development Frameworks for the area. This assessment identifies European sites of importance which could be affected at Wicken Fen, Breckland and the Ouse Washes. However, these are screened out and it concludes that there will be no significant effect resulting from implementing the proposals identified in the WCS.

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SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Northstowe and New Communities Portfolio Holder 20 September 2011
AUTHOR/S: Executive Director (Operational Services) / Corporate Manager (Planning and New Communities)

**SERVICE IMPROVEMENTS & FINANCIAL PERFORMANCE REPORT
END OF FIRST QUARTER 2011/12**

Purpose

1. This report outlines the progress made by the New Communities and Policy teams for the first quarter (April – June), and compares the actual and committed revenue and capital expenditure for the Northstowe & New Communities Portfolio with the working budget for 2011-12. It is not a key decision.

Recommendations and Reasons

2. This is the first monitoring report reported to the Portfolio Holder this year to ensure that good progress is being made against the Service plan and Council actions and remedial action taken, if necessary.
3. It is recommended that the Portfolio Holder notes progress made in this first quarter.

Background and Considerations.

Council Actions.

4. Six council actions lie within this Portfolio. Good progress has been made during Quarter 1 in respect of the six Council actions assigned to the Northstowe and New Communities Portfolio. A summary is provided in Appendix A.

Planning Policy.

5. The Team's prime focus is currently on preparing the Gypsy and Traveller Development Plan Document and the South Cambridgeshire Local Plan (as a review of the adopted Core Strategy, Development Control Policies and Site Specific Policies Development Plan Documents).
6. Progress on the Gypsy and Traveller DPD is behind the programme set out in the Council's Local Development Scheme. It had been intended to hold an Issues and Options 3 consultation in September/October 2011. Unfortunately, this has not yet taken place due to significant delays in the completion of the Cambridge Sub Region Travellers Needs Assessment Review, which will form part of the evidence base for that consultation. It is now anticipated that consultation will take place in early 2012. It is hoped that we may still be able to achieve the next milestone of Draft Submission Plan consultation in June/July 2012, depending on the scale and nature of responses received.
7. Work is under way on the evidence base for the South Cambridgeshire Local Plan, and it is anticipated that the milestone of Issues and Options Consultation in June/July 2012 can be achieved.

Growth sites.

8. Activity across all growth sites has increased in this quarter:

Northstowe

9. Discussions have now recommenced with Gallaghers and HCA, as joint promoters for Northstowe, with a view to submitting a revised planning application to the following provisional timetable:
- Submission for Phase 1 Outline Planning Application and site wide masterplan - January 2012
 - Determination of Phase 1 Planning Application - Autumn 2012
 - Issue of decision notice - June 2013
 - Amendments to existing outline planning application for whole site – 2014
10. During this first quarter period a number of workshops were held with the Joint Promoters including Northstowe Parish Forum to review and refresh the masterplan. Work is underway on various work streams including review of the master plan, the outline planning application for Phase 1 of the development, viability and affordability including public service provision and transport. It is anticipated that Phase 1 will deliver around 1,500 homes and significant employment.
11. The Rampton Drift Retro-fit project is running on time and within the budget set. This will see thirteen properties in the community of Rampton Drift (located within the perimeter of the proposed Northstowe new settlement) retro-fitted with essential energy saving and renewable energy measures and technologies. This is one of the very first projects in the country to be carrying out this work on owner-occupied dwellings with the owners in residence. The installations are averaging approximately £18k/property, include full monitoring and is being financed through the Government's Housing Growth Fund. The project is of both local and national importance as it will provide crucial evidence and experience in the run up to the launching of the Green Deal by the Government at the end of 2012.

North West Cambridge (University site)

12. There has been significant tri-partite work with the County and City Councils to progress pre-application discussions with the University. The project programme was revised following cancellation of the proposed A14 upgrade in October 2010 with a view to submitting the application in Autumn 2011. Recent work has focussed on the draft Transport Assessment working closely with the Highways Agency and County Highways.
13. The two applications (one to SCDC and the other to Cambridge City Council) are scheduled for submission on 19th September 2011. The proposals will comprise up to 3,000 dwellings; up to 2,000 student bedspaces; 100,000 sq.m. employment floorspace, local centre including supermarket, community facilities, hotel and associated open space and infrastructure. A member briefing by the applicant is being scheduled for early October.

'Cambourne 950'

14. During this first quarter, officers were working closely with the developers and parish council to resolve a list of items that need to be addressed before the the outline planning permission can be issued, aiming for the end of September 2011. These included: (a) resolution of drainage issues relating to Cambourne and a programme to upgrade Uttons Drive; (b) finalisation of planning conditions; (c) completion of Section 106 Agreement; and (d) resolution of renewable energy strategy. On-going

pre-application work also focussed on the application for the Secondary School (expected mid September 2011) and next phase of the High Street.

Orchard Park

15. Pre-applications commenced on two of the remaining undeveloped sites (Corner site on the junction of Kings Hedges road and Histon Road and Local Centre). A project plan has been agreed with applicant to ensure the submission of a hybrid planning application in October 2011 (part outline, part full, for 140 dwellings with 840sqm retail floor space). Parallel discussions have been held in relation to the expected S106 obligations and the last outstanding area of open space (POS 2).
16. Permission has recently been granted for a further 36 dwellings (H1) and detailed discussion began in relation to K1 (Self-Build site) and the issuing of tenders took place in May for appointment later in the year.

'NIAB1'

19. In this quarter, NIAB 1 detailed discussion took place to discuss (a) alterations to the parameter plans to allow more flexibility in the development process (b) transport modelling to explore whether the limit on numbers of dwellings that could be built prior to improvements to A14 should remain.
20. An amended scheme has since been considered and approved by the Fringes Joint Development Control Committee.

Sustainable Communities: Community & wellbeing

21. Much of the work programme in these area falls within the Council's action, progress for which is summarised in appendix A. Other areas to highlight include:

Children and Young People

22. In March Cabinet endorsed Young Person's Plan and accompanying action plan. Progress made in respect of those actions is summarised in Appendix C. One or two of the actions have been delayed during the first part of the year but it is expected that all actions, with one exception, will be met by the end March 2012: An extended framework agreement was proposed with the Village Colleges, but at the present time the Heads of the colleges have indicated they do not wish to proceed with this. They do however wish retain the service agreements for the Arts Development Managers, which add significantly to the 'community offer' that jointly SCDC & the colleges make to our local communities and children and young people in particular.
23. Actions over and above those contained in the Action Plan include the addition of a 'Young Voice' page in the South Cambs Magazine, which has been very much welcomed. We have received more responses (articles, information, recipes) than we are able to print at the present time.
24. The Rampton Drift Retrofit Project was used at Swavesey Village College for this year's Design Days. Over 200 young people had the opportunity to hear about the project and then design their own retrofitting schemes; the design days included a visit to Rampton Drift to meet the contractors working on the houses, presentations from the Design Team and South Cambs Officers and was very much welcomed by students and teachers.

25. Since the Young Person's Plan was agreed, the Council has also agreed to the establishment of a Youth Council, which demonstrates the Council's commitment to effective involvement of children and young people living in our District.

Older people's activities

26. Officers attended the Natural England walking leaders course in order to start our own network of walks in the district. The first ones started in July at Bar hill and Sawston to complement those already supported at Milton Country Park and Wandlebury Country Park.
27. Discussions started with Cambridge City Council about the possibility of SCDC joining the Forever Active (activities for the over 50;s) Scheme. In this quarter a six-month Service Level Agreement was put in place with the dual use sports centres supporting Fitness4Health, (GP Referral Scheme). This was to allow time to tender for the Health and Exercise Coordinator to oversee the scheme. Since June we have been out to tender and a new three year contract is now in place.
28. We continue to support Cambridgeshire Celebrates Age and attend the steering group meetings. This year it is planning to produce ongoing activities for the over 50's as well as the one off events in October. For SCDC this will bring to the attention of many residents the activities taking place in their village.

Sports and arts

29. The final £200,000 dual use capital grant for Gamlingay Village College was agreed and work began on improvements to the fitness suite and has since begun on the Multi-Use games Area (MUGA).
30. Annual agreements 2011-12 with seven Village College for community arts development services completed and signed. During this first quarter, the Council was involved directly in six public art projects (at Impington, Landbeach, Milton, Orchard Park, Teversham and Waterbeach). Ten other developer-led public art initiatives at Cambourne, Fulbourn, Girton, Great Shelford, Impington, Linton and Orchard Park were monitored by the Council.
31. The team has also been involved in providing training sessions for staff across the planning and New Communities Department (Economic Development, Arts and Sustainable Construction).

Financial performance.

32. Appendix B summarises financial expenditure for Q1 which for direct revenue expenditure shows £45,401 spent or committed against a profiled budget of £77,865 (58%), with £32, 464 in hand. The main areas of variance relate to timing difference in payment against how the budgets were profiled.
33. Community Development: £5,240 in hand generally due to timing differences in relation to the approval of expenditure against the profiled budget account for the variance of £5,240 in Quarter 1, however a Community Development Grant of £750 was paid out in Quarter 1, a further grant of £500 has been committed and two applications totalling a possible £3,200 are awaiting decision. A payment of £10,000 representing 50% of the annual budget for community development projects was

made to Cambridgeshire County Council in July 2011 for this authority's contribution towards the Area Partnership Agreement - this payment will bring the profiled budget in Quarter 2 back in line.

34. Sports Development: £3,828 in hand This variance is the result of similar timing differences in relation to the approval of grants toward funding elite athletes. Within the profiled budget in Quarter 1 there was an allocation of £5,000; however, commitments of £4,600 that would have been offset against this were not approved until July 2011. Officers have every confidence at this stage that the full budget will be spent.
35. Arts Development: £2,788 in hand. This variance is again due to commitments being out of step with the pre-determined profiled budget. The profiled budget for Arts Partnership support funding (£5,000) has not been spent yet. The annual budget in the 2011/12 original estimate was £10,000; this has been reduced to £6,000, pending a virement (if required) – officers hope to commit the whole of this in September 2011. The £4,000 has been reallocated to Arts Dual Use initiatives, along with a further £1,000 from Arts Development projects. Of the reallocated Arts Dual Use budget of £70,000, £15,550 has been spent or committed in Quarter 1, an over commitment of £2,550 compared to the profiled budget. £1,550 of this relates to an approved rollover request from the 2010/11 budget in connection with arts development projects in the Melbourn area; however, the rollover will only be released once all other budgets have been committed within the portfolio. A further £42,000 of the remaining reallocated budget is shown as commitments on the financial management system in Quarter 2.
36. Growth Agenda: £7,683 in hand. There has been less use of consultants than anticipated so far this year.
37. Planning Policy: £12,925 in hand. Less use has been made of consultants than expected so far this year, partly because the focus has been on preparing for the new Local Plan and conformity to the National Planning Policy Framework once that formally replaces planning policy statements. The budget may need to be adapted later in the year to fit new policy requirements.
38. Capital Grant Expenditure: £59,970 in hand. No capital grants were allocated in the first quarter of 2011/12 pending the grants review. The first tranche of Community Capital grants are due to be considered by the Leader's Portfolio in October 2011.
39. Other Capital Expenditure
 - a. Growth Areas (River Cam Project): £2,060 in hand – no expenditure was incurred or committed in Quarter 1.
 - b. Rampton Drift Demonstrator Project: £0 in hand – expenditure and commitments are in line with the project plan.

Implications

40. Financial	The need to ensure appropriate profiling of budgets at the start of each year has been identified as a future action.
Legal	None.
Staffing	None.
Risk Management	Risks associated with poor performance are included in and managed through the Planning and New Communities Risk Register which is reviewed quarterly by the service's management team and EMT.

Equality and Diversity	None arising directly from this report and recommendation
Equality Impact Assessment completed	No Equality Impact Assessments are completed for specific actions prior to implementation
Climate Change	

Consultations

41. Managers across New Communities and Planning and Finance have been consulted in the preparation of this report.

Consultation with Children and Young People

42. None in relation to this report, which is for monitoring purposes.

Effect on Strategic Aims

43. Ensuring that the service performs well and its programmes remain on target will help to ensure that the Council meets its strategic aims.

Conclusions / Summary

44. With one or two exceptions, all programmes of work are on schedule and good progress was made in the first quarter, and the team are working hard to ensure momentum is maintained.

Background Papers: the following background papers were used in the preparation of this report:

- Planning and New Communities Service Plan 2011-2012.
- Young Persons Plan and accompanying action plan.
- Financial reports relating to Q1 (Appendix B).

Contact Officer: Jane Green – Head of New Communities
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Appendix A - Progress on Council Actions Q1 2011/12

ACTION A2 – Engage proactively with PC's & local communities .

We will engage proactively with parish councils and local communities through the promotion of a more open section 106 system and explore the opportunities for local people to influence community priorities for funding by developers in light of forthcoming government policy.

Progress

- Heads of terms' templates and guidance notes for applicants are being drafted for discussion the agents forum prior to implementation
- First of a series presentations of section 106 related topics (planning policy, viability, monitoring, CIL) given to Members.
- Website has been reviewed and updated (achieving between 50-70 'hits' per month)
- Monthly reports are now available advertised on the weekly bulletin.
- Plans to update the recreation study and consult with Parish Councils and local interest groups and clubs as to the current demand and shortfall in each settlement under discussion.
- Continue to work with parish councils to identify community requirements

ACTION B1/4 - Plan for growing older population

We will take an inclusive approach to enhancing the quality of life for older people in our community through actions: with our partners, to enable more older people to live actively and independently within their communities - as a first step, to organise a workshop to bring together the needs of local voluntary groups and older people to plan for the growing older population.

Progress

- The workshop was held on 1st July and a number of actions have be agreed including establish a small working group with membership from the local authorities, health, and the voluntary sector, along with older people's representative organisations to translate our discussions into action (from September), to carry out the 'Ageing Well' audit in South Cambridgeshire to check against national standards how we're doing and identify areas for improvement across all services, and develop an Older People's strategy for South Cambridgeshire (with an action plan) – based on local evidence such as the Joint Strategic Needs Assessment and prioritising actions to improve the quality of life for local older people with an 'Ageing Well' workshop every year to report progress
- The GP referral scheme has been let with the new contract starting in September 2011. The current scheme will continue until then, running in eight sports centres with the possibility of a ninth from 2012.
- We have joined forces with Cambridge City Council and from September we will be promoting 7 activity classes for the over 50's within South Cambs through the Forever Active scheme with the intention to increase this over the year.
- We continue to support and are part of the Cambridgeshire Celebrates Age steering group, promoting the value older people bring to our communities. All activities for over 50's in S.Cambs (over 24 villages listed for the October edition).
- a number of walking groups have been established within the villages and will be extending this network, along with other exercise classes for the older adult throughout 2012 (2 more are currently being planned for September).

ACTION B2/1 - Developer contributions to new sporting facilities

We will encourage the development of existing, and the creation of new, sporting opportunities for all age groups: Maximising developer contributions towards new sporting facilities to serve developments of over 10 dwellings.

Progress

- In Quarter 1 of 2011/12 the District Council transferred the sum of £57,577.99.
- Continue to work with parish councils to identify community requirements in major developments
-

ACTION B2/2 - Dual-use sports centres, local clubs & partners

We will encourage the development of existing, and the creation of new, sporting opportunities for all age groups: Working with dual-use sports centres, local clubs and partners to increase participation and signpost opportunities for funding.

Progress

- Review of the dual use centres currently underway given the end of the capital-funding programme.
- We continue to promote activities within the sports centres and financially support the establishment of new classes/courses and to offer advice in relation to grants and funding for sports clubs, parish councils and other voluntary organisations.. 10 projects currently under development (capital grants, S106 and planning apps) in Barton, Cambourne, Cottenham, Duxford, Fulbourn, Gamlingay, Linton, Stapleford, Swavesey and Willingham.

ACTION B2/3 - London 2012 & Olympic legacy

We will encourage the development of existing, and the creation of new, sporting opportunities for all age groups: Working with partners to run specific events as part of the build-up to London 2012 and prepare to take advantage of the Olympic legacy for participation and economic development

Progress

Our Olympic and Paralympic programme includes:

- Support for indoor and outdoor athletics competitions for the special schools in South Cambs (February and April with over 150 participants),
- The Youth Games Plus event for children with special needs across Cambridgeshire (in June with over 500 participants).
- The annual School Sports partnership Mini Olympics event (in June, 1400 participants)
- Annual Park Life event (24:07:11) which was the biggest yet this year with over 3000 visitors.
- Support for Cambourne Bloco to support the cultural Olympiad.
- The Elite Athlete scheme is now in its final year and at its first meeting in 2011/12 supported 12 children at a cost of £4600 (£15400 remaining).
- Support a number of series of running events e.g. Cambourne 10K (April – 991 runners, 112 in fun run) the Bonfire burn 10K at Histon and Impington to helping us to create a legacy of competitions long after the Olympics have ended.

ACTION B2/4 - Increase participation in sport & recreation –

We will encourage the development of existing, and the creation of new, sporting opportunities for all age groups: Continuing to work with statutory and voluntary health and community partners to increase participation in sport and recreation.

Progress:

- We support an ever expanding list of activities for all age groups and abilities. By funding these for an initial few weeks we have managed to make most of them sustainable in the longer term by recruiting volunteer leaders and offering support as and when required. These include:

Children:

- Disability Trampolining (8children/session) and Disability Golf
- Netball holiday camps (Summer Camp :110 participants),
- Street Football at Bar Hill, Cambourne, Fulbourn, Orchard Park & Sawston.
- Athletics,
- High 5's. Netball, and more (1st qtr: 272 primary school children took part)

Adults

- Run for Fun and Walk for Fun. Two new Run4Fun courses started at Comberton (20 parents) and Bourn (47parents) for an initial 10 week programme.
- Adult Netball league.

Appendix B

Northstowe and New Communities Portfolio

Recharges removed below

Actuals 2010/11 £	To 30/06/11 2011-12 MONTH 3										Variance vs Profilled Budget £	Paragraph reference in report
	Original Estimates 2011/12 £	Central & Dept Overheads in Budget £	Budgeted Net Direct Expenditure £	Profilled Budget £	Net Expenditure to date £	Commitments £	Other Adjustments £	Adjusted Net Direct Expenditure £				
	REVENUE EXPENDITURE											
98,167	107,590	(77,590)	30,000	6,990	1,750		1,750	1,750		5,240		
164,264	170,450	(65,250)	105,200	15,300	12,077	75	(680)	11,472		3,828		
126,921	134,390	(54,390)	80,000	20,950	(4,459)	5,900	16,721	18,162		2,788		see report
586,576	1,226,630	(1,239,580)	(12,950)	14,125	6,442			6,442		7,683		
519,794	631,160	(545,460)	85,700	20,500	7,575			7,575		12,925		
<u>1,495,722</u>	<u>2,270,220</u>	<u>(1,982,270)</u>	<u>287,950</u>	<u>77,865</u>	<u>23,385</u>	<u>5,975</u>	<u>16,041</u>	<u>45,401</u>		<u>32,464</u>		IN HAND
	CAPITAL EXPENDITURE											
99,981	100,000		100,000	24,990	12,141		(12,141)	0		24,990		
99,978	100,000		100,000	24,990	7,850		(7,850)	0		24,990		see report
35,310	40,000		40,000	9,990	9,000		(9,000)	0		9,990		
<u>235,269</u>	<u>240,000</u>	<u>0</u>	<u>240,000</u>	<u>59,970</u>	<u>28,991</u>	<u>0</u>	<u>(28,991)</u>	<u>0</u>		<u>59,970</u>		IN HAND
5,250	8,240		8,240	2,060	0			0		2,060		
18,950	275,000		275,000	68,700	8,000	60,700		68,700		0		see report
<u>259,469</u>	<u>523,240</u>	<u>0</u>	<u>523,240</u>	<u>130,730</u>	<u>36,991</u>	<u>60,700</u>	<u>(28,991)</u>	<u>68,700</u>		<u>62,030</u>		IN HAND

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Appendix C Approved Action Plan – March 2011 – March 2012

Objective	Action	Date	Progress as at September 2011.
1. To set up a Facebook page to inform and engage children and young people across the District	Work with IT and Comms to ensure a consistent approach with the Council's Social Media pilot, whilst ensuring the page is attractive and usable for young people.	March 2011	Facebook and blogging are now well established throughout the Council - these mechanisms will be utilised when seeking the views of children and young people on a range of issues (planning consultations, Gypsy & Traveller Consultations, Youth Council).
2. To set up blogging mechanism (Twitter? Word Press?)	Work with IT and Comms to ensure a consistent approach with the Council's Social Media pilot, whilst ensuring the mechanism is attractive and usable for young people	March 2011	As above
3. Ensure all Council Report Templates include a line to indicate whether or not children and young people have been consulted or involved.	Work with Democratic Services to ensure line is added in all Council Report templates.	March 2011	All Council Report Templates now include a line to indicate consultations with children and young people
4. Put together corporate 'toolkit' for use by all Departments to ensure the views of children and young people have been sought and considered, where appropriate and necessary.	Toolkit to include: <ul style="list-style-type: none"> • Signpost to Facebook and Blogging • Contacts for Connections Youth Bus and Village Colleges • Tips and training where necessary to support Members and Officers working with young people (ie, dejargonised documents, facilitating workshops, recording views and opinions, feeding back to young people, etc.) 	March 2011	Toolkit to be finalised now that SCDC has agreed to establish a Youth Council.
5. Disseminate toolkit across Council	Insite, lunchtime seminar(s), attend team meetings as and when necessary.	March 11 – March 12	As above

<p>6. Promote Facebook, Blogging, Youth Bus, Village College involvement, etc to children and young people</p>	<p>Facilitated workshops in relation to formal and informal consultations maximising existing Village Colleges Visits with Youth Bus as and when necessary for both formal and informal consultations Spread info via social media mechanisms</p>	<p>March 11 – March 12</p>	<p>Continued promotion of the ways in which children and young people can be involved (via visits with Youth Bus, through the South Cambs and City Area Partnership for Children & Young People's Service, Locality Partnerships, through schools, through South Cambs magazine)</p>
<p>7. Working with Village Colleges to secure a framework agreement to establish a more co-ordinated approach between council services, Members and children and young people.</p>	<ul style="list-style-type: none"> • Promote and develop activities to encourage citizenship, sports, arts, and other positive activities to involve children and young people. • Review service level agreements involving Arts Development Managers • Review Dual Use Agreements • Encourage Members to take part in citizenship sessions in local Village Colleges 	<p>Dec 2012</p>	<p>Village Colleges Heads have indicated that at present they do to progress a wider framework agreement; but do wish to renew the service level agreements for Arts Development Managers (ADM)</p> <p>Annual agreements for 2011-12 have been completed and signed with seven Village colleges for ADMs.</p>
<p>8. Ensure engagement and involvement of priority groups as identified and targeted by Children's Trust and City & South Cambs Area Partnership</p>	<p>Continued involvement in Children's Trust, Area Partnership and Implementation Group to ensure partnership working continues and opportunities to exploit funding and resources benefits children and young people within the City and South Cambs Area Partnership boundaries.</p> <ul style="list-style-type: none"> • Youth Bus to carry over project from Willingham to Meldreth • Work at Fen Road, Chesterton to facilitate provision of recreation area (currently no SCDC Officers working at Fen Road Site) • Youth Bus to return to Smithy Fen in Cottenham to engage children, young people and adults in wider community issues • Pilot Street Football sessions at Smithy Fen with a view to eventually 	<p>March 11 – March 12</p>	<p>Youth Bus project at Willingham is now being carried out at Meldreth; the youth bus is also working at Fen Road Chesterton in partnership with Cambs City Council; the Youth Bus visits to Smithy Fen are about to begin in October.</p> <p>Street Football Sessions are to begin in October/November once the Youth Bus visits begin.</p> <p>Good progress being made on the Rock & Pop Network: Roctober event organised with 4/5 bands taking part, Rock Summer school at Swavesey Village College involving over 20 11-16 yr olds, Rock Concert held in Swavsey attended by over 200 people.</p> <p>Successful Carnival Project culminating in Park Life in July 11 attended by approx 3000 people.</p> <p>Work underway to help disabled children and young people to identify and provide the services and activities</p>

	<p>run sesions at Cottenham Village College with Gypsy and Traveller children attending at the VC</p> <ul style="list-style-type: none"> • In partnership with City, County and Village Colleges across SC, establish a Rock & Pop Network across the District for 14 – 19 yr olds – led by national and local djs – targeted work to engage hard to reach groups as well as those in mainstream education • Working in partnership as above, the Carnival Project aims to bring together children, young people and adults by working together around the Olympic 2012 themes culminating in a joint event at Parklife in July 2011. • Changes in funding for disabled children, young people and adults mean that they will be able to ‘buy’ the services and activities they want for themselves, therefore many funding streams and services have been cut while the new funds are put into place. The project to kick start a programme of activities aimed at helping disabled children and young people to identify and provide the services and activities they want, will become self-funding within a year and will be run in the northern part of the District, based in Milton for the first year and then be taken across to Cambourne and other areas across the District later in the year. 		<p>they want following changes to the way that funding is now given.</p>
<p>9. Encourage and promote the</p>	<ul style="list-style-type: none"> • Promote, via consultation, email, website, facebook and existing 	<p>March 11 – March 12</p>	<p>All parish councils have received a copy of the Young People's Plan with offers to attend Parish Council</p>

involvement of children and young people at Local Parish Council level	<p>communications channels (Democratic Services Bulletins, Planning Policy Bulletins, etc) the engagement of children and young people in local parishes. To include making the toolkit available to Parish Councils.</p> <ul style="list-style-type: none"> Facilitated workshops with Parishes (by request) to support involvement and engagement with children and young people. 		meetings to explain how South Cambs DC is involving children and young people - uptake has been mixed but some of our parishes already actively involve young people through the locality partnerships in their local communities (Cottenham & Swavesey Locality), while others such as Longstanton are making good progress to ensure involvement in progressed.
10. Monitoring and Evaluation	<p>To make quarterly monitoring reports to the Customer Service Excellence Steering Group to ensure maximum uptake and commitment across the Council</p> <p>To ensure a 'children & young people's' line is added into all Council Report Templates under 'consultations', to ensure children and young people are consulted at appropriate and relevant times</p> <p>Identify any problem areas (decrease of involvement, no involvement) and resolve as appropriate</p>	June 2011	<p>The CSE steering group is to be replaced with alternative arrangements, which have yet to be finalised.</p> <p>In the meanwhile, monitoring is carried out within the team progress reported to the Northstowe and New communities PFH</p>
11. Continued support for Children and Young People's South Cambs and City Strategic Area Partnership	<p>Continue to work with and actively contribute to Children's Trust, South Cambs and City Strategic Area Partnership to identify priority areas and groups with partner organisations. This work includes joint commissioning of services to work across South Cambridgeshire and Cambridge City within agreed priorities.</p>	April 2011 – March 2012	As 8 above, as well as continued work with Area Partnership to ensure funding is focused to areas of identified priorities across South Cambridgeshire (Gypsy, Traveller and Eastern European communities, mental health, areas of demographic change)

Forward Plan – Northstowe and New Communities Portfolio as at 12 September 2011

Portfolio Holder Meeting	Agenda Title	Key Purpose	Corporate Manager(s)	Responsible Officer(s)
15 Nov 11	Papworth West Central SPD	Decision	Jo Mills	Caroline Hunt
	Residential Travel Plan SPD (Cambridgeshire County Council's)	Decision	Jo Mills	Claire Spencer
	Service Improvements & Financial Performance 2011/12 – Q2	Monitoring	Jo Mills	Jo Mills / John Garnham
	Service Plan Priorities 2012/13	Decision	Jo Mills	Jo Mills
25 Jan 12	LDF Annual Monitoring Report 2010/11	Y For decision	Jo Mills	Jenny Nuttycombe
	Capital and Revenue Estimates 2012/13	Recommendation to Cabinet/Council	Alex Colyer	John Garnham
21 Feb 12	Service Improvements & Financial Performance 2011/12 – Q3	Monitoring	Jo Mills	Jo Mills / John Garnham
17 Apr 12				

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