

REPORT TO: Scrutiny and Overview Committee
Cabinet

21 June 2018
28 June 2018

LEAD OFFICER: Joint Director of Planning and Economic Development for Cambridge
and South Cambridgeshire

Cambridgeshire And Peterborough Minerals And Waste Local Plan - Preliminary Draft Consultation Response

Purpose

1. To seek agreement to submit a response to the Minerals and Waste Local Plan: *Preliminary Draft Consultation*, in accordance with the points discussed below.
2. This is not a key decision because the preparation of the Minerals and Waste Local Plan is at an early stage, and the effects on communities living or working in the area covered by the Greater Cambridge Shared Planning Service are not yet clear. The item was first published in the June 2018 Forward Plan.

Recommendations

3. It is recommended that Cabinet agree:
 - (i) the response to the Cambridgeshire and Peterborough Minerals and Waste Local Plan: *Preliminary Draft Consultation* that is consistent with the views set out in this report; and
 - (ii) that officers may submit the final response online via the County Council's website.

Reasons for Recommendations

4. This consultation period provides an opportunity for Cambridge City Council and South Cambridgeshire District Council to jointly shape the preparation of the next Minerals and Waste Local Plan.

Executive Summary

5. The Minerals and Waste Local Plan: Preliminary Draft is subject to consultation until 26 June 2018. The consultation document and its supporting papers set out the broad approach that Cambridgeshire County Council and Peterborough City Council wish to take in preparing the new Plan. This is the first of three stages of consultation.
6. Responses are proposed to specific policy areas, raising initial queries about the approach to adopting an appropriate strategy in the emerging Plan. It is clear that continued partnership working is necessary, and Cambridge and South Cambridgeshire Councils will seek to understand the mechanisms available for this partnership approach in more detail.

7. Key areas for response at this stage include continuing to work with the Minerals and Waste Authority to understand any submissions made via the Call for Sites for Minerals or Waste uses, and how any such submissions may influence the choice of strategy. In respect of waste uses, to be clear on the approach to provision of Household Recycling Centres and how the potential for new or extended Water Recycling Centres will be approached in adopted policy.

Background

8. Cambridgeshire County and Peterborough City Councils (“the County”) have prepared the Minerals and Waste Local Plan: Preliminary Draft (MWLP), and this is now subject to public consultation running from 16 May to 26 June 2018. This is the first of three rounds of consultation and puts forward various issues and options for mineral and waste development management up to 2036. The MWLP is prepared for the geographic area covered by the Cambridgeshire & Peterborough Combined Authority.
9. This proposed response is prepared by the Greater Cambridge Shared Planning Service as a joint response on behalf of both Cambridge City Council and South Cambridgeshire District Council (“the Councils”). Comments are provided on the basis that the preparation of the MWLP is in the early stages, and there is insufficient information available to provide more detailed comments. Comments are therefore restricted to matters of principle, and to highlight where further discussions will be required.
10. The County proposes the MWLP will be prepared in accordance with the following timescale:

Plan stages		Date
1	Consultation on Sustainability Appraisal Scoping Report	Dec 2017
2	Issues & Options Consultation (Reg 18)	May/June 2018
3	Preferred Options Consultation (Reg 18)	Mar/Apr 2019
4	Proposed Submission (Reg 19)	Nov/Dec 2019
5	Plan submitted (Reg 22)	Mar 2020
6	Independent Examination (hearings)	Jun 2020
7	Inspector’s Report	Aug 2020
8	Adoption of Plan	Nov 2020

11. All consultation and background papers are available on the County Council website as follows: www.cambridgeshire.gov.uk/mwlp

Considerations

Overall Approach

12. The Councils will seek to work closely with the County to ensure the adopted Plan meets the overall needs and aspirations of the area. The Councils wish to fully understand the approach to meeting the requirements of the Duty to Cooperate, and would encourage a constructive mechanism for ongoing and positive dialogue is formally established. The Councils are keen to fully engage in the further preparation of the MWLP.

13. Draft Policy 1 sets out a clear approach to achieve sustainable development in meeting objectives around minerals and waste provision. This is combined with detailed policy requirements on minimising greenhouse gases, requiring planning applications to demonstrate how schemes will achieve this. This policy approach to addressing the implications of climate change is largely bought forward from the adopted MWLP.
14. The MWLP proposes a set of objectives, including supporting sustainable economic growth and the delivery of employment opportunities. This is to be welcomed.

Spatial Strategy for Minerals

15. A key driver for the choice of strategy is the future of the Block Fen/Langwood Fen area in East Cambridgeshire/Fenland District Council areas. This allocation, subsequently supported by a Supplementary Planning Document, is due to provide significant sand and gravel resources for the period to 2050. This has not come forward at the rate anticipated (see paras 6.3-6.6 of the MWLP) although a number of areas have received consent and are actively being worked. If it is found this area cannot deliver resources to the full scale originally envisaged, there may be a need to identify extensions to existing sites or entirely new sites for other sand and gravel extraction across the Plan area. A Call for Sites has also been launched as part of the current consultation, and it is not yet known whether additional sites will be promoted and whether any such sites may be within the Greater Cambridge area. The Councils will need to work closely with the County to ensure the potential impacts of any sand and gravel extraction that may emerge in the area are considered carefully.
16. Views are invited on the most appropriate strategy approach, with a view to balancing certainty for land owners and communities whilst incorporating flexibility to ensure continued supply of minerals. The MWLP proposes that an “area of search” approach would provide the most flexibility, but recognises this may also cause significant uncertainty for communities. The MWLP asks whether any strategy approach should take into account the presence of existing infrastructure capacity. The Councils welcome this approach in principle, however this must be balanced against the sites that are promoted, any competing or conflicting land uses, and how any such proposals may align with wider planning considerations. Draft Policy 2 of the MWLP does not propose an approach at this stage, and the proposed strategy will be contained in further iterations of the MWLP. The Councils may wish to provide further comment on this matter in light of any submissions made during the aligned Call for Sites process that is currently open. Officers will continue to seek a positive working relationship with the County as part of the duty to cooperate on the overall approach that would be most appropriate.
17. Extraction of other mineral resources are of less direct relevance to the Councils. Supplies of limestone in the area are more limited, and are found in a small geographical area to the north west of Peterborough. Brickclay deposits are extensive but located close to Whittlesey. Small deposits of for example, high quality chalk, exist throughout the Plan area but these are small in nature and any application to work these deposits is considered on an ad-hoc basis.

Spatial Strategy for Waste

18. The MWLP presents an option for the waste strategy in future which makes allocations for strategic waste management sites, and a criteria-based approach for any other proposal which may come forward. This is in light of only 10 of 34 allocations having been granted planning permission, and a number of consents being granted on non-allocated sites. A full review of the existing allocations and permissions is necessary to understand the reasons for non-delivery, and the Councils would expect the County to prepare this information at an early stage. The Councils are broadly supportive of an approach to investigate the provision of permanent waste management facilities within new settlements or growth sites in principle, subject to achieving a suitable balance between competing land uses. The impact of waste uses on the delivery of those sites, and the suitability of the use taking account of how the sites are being planned, must be explored to understand their suitability on a case by case basis.
19. New policies must put in place appropriate mechanisms to ensure any waste management facilities are not brought into conflict with neighbouring land uses. The MWLP seeks views on the strategy that should be adopted for the delivery of waste management sites and particularly whether allocations should be made, or a criteria-based approach pursued. It is difficult to express a clear view on this at present, as it is not yet understood why the currently adopted set of allocations have not been delivered. The Councils will seek to work with the County in further exploring this matter prior to the publication of the Further Draft Plan in Spring 2019.
20. The MWLP raises the potential use of existing employment areas for the provision of waste management operations, arguing that these facilities are often under cover and indistinguishable from other employment uses. Further information is required on the specific types of use this may entail before a full view could be provided. It will be important to consider this proposal in a wider context that includes the Councils' support for continued economic growth and having regard to the aspirations expressed by the Mayor in achieving a significant uplift in GVA across the Combined Authority area, and the important role of Greater Cambridge in that objective. If employment land is given over to waste management facilities this will need to be balanced against the economic growth impetus desired, recognising that such facilities would not provide a high job density.
21. Policy 4: The Spatial Strategy for Waste is to be developed for the next iteration of the emerging Plan, and as such there is no draft to comment on. However, comments on the approach as set out above will help shape the draft Policy.
22. Policy 5: Providing for Waste Management identifies the existing and forecast capacity across a range of waste management methods. There is a small surplus in capacity for all types of waste management with the exception of "Treatment and energy recovery processes", where there will be a deficit from 2026. It is understood this is the position at present, but if the proposed energy from waste facility in Waterbeach is granted planning permission (by the County Council as Waste Management Authority) the shortfall will be removed. It should be noted that that when consulted on the application South Cambridgeshire District Council raised a number of concerns on the grounds that the proposal would have a significant and adverse visual impact on local character and the surrounding countryside, and the heritage assets at Denny Abbey.

23. There will be an overall challenge to the provision of waste management facilities, and particularly within the strategic sites where land is constrained and competing land uses will further increase land values. The policy approach will need to be clear in achieving a balance in such instances.
24. The approach to Water Recycling Allocation Areas and Water Recycling Consultation Areas is contained within draft Policy 12, and includes criteria that would be used to assess proposals to extend existing works or provide new works, along with a range of criteria based policies elsewhere in the plan in which address issues including design, amenity, biodiversity and heritage. The supporting text for draft Policy 12 references the aspiration to relocate the Cambridge Water Recycling Centre (WRC), in relation to the opportunities for regeneration of Cambridge Northern Fringe East, and that the adopted Cambridgeshire and Peterborough Minerals and Waste Development Plan provides the statutory local waste policy framework under which any proposals would be considered. It will be important that this policy continues to be supportive where new or replacement facilities are needed to support growth, but provide the right criteria to ensure sites for those facilities are appropriate to their location. The Draft MWLP does not allocate a potential site for a new WRC facility.
25. An overall approach of continued partnership working will be required in accordance with the Duty to Cooperate between the minerals and waste authorities, the local planning authorities and those involved in the wider growth agenda across Greater Cambridge, to enable future plan making.

Waste Needs Assessment

26. The Waste Needs Assessment identifies there are “no specific significant planned regeneration or major infrastructure projects identified within the plan area as per the National Infrastructure Delivery Plan 2016-2021 that would result in a significant increase in waste generation not accounted for through dwelling stock forecasts.” Whilst true, it is not clear that this fully takes account of the current proposed growth figures across the Greater Cambridge area (i.e. 33,500 new homes and 44,000 new jobs by 2031) or the significant transport schemes proposed by the Mayor/Combined Authority. Both would give rise to additional demand for household and other waste facilities, and cause further increases in construction waste. It is unclear to what extent the overall growth agenda has shaped the options now presented, and the forecasts of capacity and deficits.

Site Assessment Methodology

27. All sites submitted via the Call for Sites process will be assessed using the Site Assessment Methodology now proposed. The methodology is variable depending upon the potential use proposed, and the two Councils will continue to discuss the application of this methodology with the County.
28. There are several points to raise at this stage. The assessment criteria on Table 1 (page 4-5) and Table 2 (page 7-10) and Table 5 (page 13) refer to deliverability, but does not appear to include the issues in the Greater Cambridge area that have caused challenges in delivery of facilities i.e. high land values, congestion, lack of sites and competing land requirements. It is suggested that site assessments should consider this issue in more detail, recognising that some of these matters will be dealt with in detail at any planning application stage.

29. It is not clear if the zones for potentially significant dust effects in Table A2.9 on page 26 just relate to mineral extraction sites or to mineral and waste processing facilities as well, but would be a further site challenge in urban areas.

Next steps

30. Officers will collate a response on the basis of the discussion within this report to enable an online response to the consultation. This will specifically reflect the points made in respect of draft policies 1, 2, 4, 5 and 12.
31. Further discussions in connection with the County's fulfillment of the Duty to Cooperate will be necessary.

Options

- (i) To not agree that a response is made on the basis of the points in the report above.
- (ii) To agree to add or remove items to the response

Implications

32. In the writing of this report, taking into account financial, legal, staffing, risk management, equality and diversity, climate change, community safety and any other key issues, the following implications have been considered: -

There are no significant implications arising from this report.

Consultation responses

33. None

Effect on Strategic Aims

Aim 1 – Living Well

34. The preparation of a new Minerals and Waste Local Plan will enable the Council to work in partnership to continue to promote waste recycling initiatives, and increase the quality and quantity collected

Aim 2 – Homes for Our Future

35. By working in partnership with the Waste and Minerals authorities, the Council will be able to seek the supporting infrastructure required to deliver new homes

Aim 3 – Connected Communities

36. None relevant

Aim 4 - An Innovative and Dynamic Organisation

37. None relevant

Background Papers

Where [the Local Authorities \(Executive Arrangements\) \(Meetings and Access to Information\) \(England\) Regulations 2012](#) require documents to be open to inspection by members of the public, they must be available for inspection: -

- (a) at all reasonable hours at the offices of South Cambridgeshire District Council;
- (b) on the Council's website; and
- (c) in the case of documents to be available for inspection pursuant to regulation 15, on payment of a reasonable fee required by the Council by the person seeking to inspect the documents at the offices of South Cambridgeshire District Council.

(a) Cambridgeshire and Peterborough Minerals and Waste Local Plan: *Preliminary Draft Consultation* (May 2018)

(b) Sustainability Appraisal Scoping Report (May 2018)

(c) Waste Needs Assessment (May 2018)

(d) Mineral Safeguarding Areas Methodology (May 2018)

(e) Site Assessment Methodology (May 2018)

(f) Flood Risk Assessment Methodology (May 2018)

All papers above are available from www.cambridgeshire.gov.uk/mwlp

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