

Appendix 1: Assessment of the need to make representations to the Cambridgeshire and Peterborough Minerals and Waste Local Plan Proposed Submission (Publication) Draft, November 2019

Background

Cambridgeshire County Council and Peterborough District Council (the Minerals and Waste Authorities) are reviewing their joint Minerals and Waste Development Plan. They have previously consulted on a Preliminary Draft Local Plan in 2018 and more recently a Further Draft Local Plan between March and May 2019. The Greater Cambridge Shared Planning Service has previously provided representations to these consultations on behalf of Cambridge City Council and South Cambridgeshire District Council (the Councils).

The Minerals and Waste Authorities considered the comments made to these previous consultations and have now produced the Proposed Submission Plan, which they are consulting upon between 15th November and 9th January 2020. At this stage of consultation representations are restricted to matters of 'soundness' and legal compliance of the Plan and will be considered by the independent Planning Inspector at examination. The Councils have considered the Proposed Submission Plan and how the previous representations made in objection or support have been taken forward into the Submission Plan in order to decide whether we should make any further representations, as set out below.

Assessment of Previous Representations and Proposed Submission Plan

This section provides a summary of the main areas of concern that the Councils had in the previous consultation on the Preliminary Draft Plan and how they have been addressed in the Submission Plan.

Policy 2: Providing for Mineral Extraction

In the draft plan there was some uncertainty about whether the mineral allocation at Block Fen/Langwood Fen West Mepal would come forward, and the Councils objected because of this uncertainty, because it was not clear what the implications would be should alternative allocations be necessary.

The background document to Policy 2 now confirms that this uncertainty has been removed. As a result the Block Fen/Langwood Fen allocation remains within the Plan and no alternative allocations have had to be made. Therefore, it is considered that there is no need to make a further representation on this matter.

Impact of traffic from minerals operations

The plan includes some extensions to existing mineral operations at Mitchell Hill Farm South and Chear Fen in Cottenham, and the allocation at Bare Fen and West Fen, Willingham/Over is broadly similar to the allocation in the existing Plan. The Councils previously supported the principle of seeking extensions to existing sites over allocation of new sites, but sought reassurance that Heavy Commercial Vehicle (HCV) traffic should avoid routes through villages where possible and be minimised or mitigated if avoidance is not possible.

The policy now includes additional detail about each site, including their access route. Mitchell Hill Farm and Chear Fen are via the existing A10 roundabout, and Bare Fen and West Fen are through the existing Needingworth Quarry and through the agreed HCV routing.

Policy 23: Traffic, Highways and Rights of Way sets out that mineral and waste management development will only be permitted if (at criteria d) 'any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residential cumulative impacts on the road network'. This policy also states that proposals for the movement of mineral and/or waste must demonstrate that the latest identified HCV network should be utilised, where reasonable and practical to do so. There is a link to the HCV network in a footnote in the Plan <http://www.cambridgeshire.gov.uk/freight-map>.

In the background document to Policy 23, the minerals and waste authorities state that 'various comments relating to HCVs, and their impact off-site, are noted and understood, and the Councils, in principle, share the concerns raised. However, the Councils have a duty to provide suitable opportunities for the extraction of minerals and the processing of waste, and inevitably such operations generate HCV movements. The Councils are committed to making decisions (both via policy and subsequent planning applications) which minimise the harm of HCV movements, and where harm arises, mitigating for that harm. The Councils believe that the Policy strikes the right balance, by placing firm policy in respect of traffic related matters, but not so onerous as to make the delivery of mineral sites unviable or impossible to be achieved. The Councils also have to prepare such a policy in conformity with national policy, which limits what the Councils can reasonably seek developers to conform to.'

Policy 23 and in particular criterion b will be used in any future planning applications for extensions to minerals sites and the HCV routes set out aim to direct this traffic to the larger roads. Therefore, it is considered that there is no need to make a further representation on this matter.

Policy 4: Providing for Waste Management

The plan is not proposing any allocations for waste management development and instead Policy 4 sets out the strategy for any new waste management development. The justification for this given by the minerals and waste authorities is that there is a limited need for further capacity over the plan period and past experience has shown that allocated sites don't always come forward, and proposals have been approved on non-allocated sites.

Instead the strategy is to leave it to the market to bring forward suitable and viable sites based upon the direction and criteria set out in Policy 4. Policy 4 directs waste proposals to urban areas (within Greater Cambridge these are Cambridge, Cambourne, Northstowe and the Waterbeach New Town), with first consideration to be employment areas (B2 and/or B8) within these settlements and any 'strategic' employment areas over 10ha which might not necessarily be located in these urban areas. Where such sites are not available or suitable support may be given to facilities on other suitable sites in urban areas or on the edge of them (subject to certain factors which are set out). Priority will be given to the use of brownfield land within the urban areas.

The Councils previous comments on this policy showed some support to the flexibility of this approach, as land will not be unnecessarily sterilised from other uses by an allocation for waste management. However, there were concerns about whether this approach will deliver the facilities required as it relies on the market bringing forward proposals and for the minerals and waste authorities to engage at an early stage in the preparation of Local Plans. Other concerns previously raised were whether the use of employment sites could have an impact on the overall employment strategy for Greater Cambridge. Also, the draft plan did not make it clear whether the existing allocation for a waste management site at Northstowe is still required, either at all, or within its current location, as the uncertainty is hampering delivery of the Enterprise Zone and further clarification was sought.

The Proposed Submission Plan policy remains unchanged and the minerals and waste authority state that the justification for this approach is set out in the evidence reports 'Waste Needs Assessment'

<https://drive.google.com/drive/folders/16Ex6yhTEoNwKsNVWasVVyi-HXIDKfU7e>

and 'Developing a Spatial Strategy for Waste Management Provision 2019'

<https://drive.google.com/drive/folders/16Ex6yhTEoNwKsNVWasVVyi-HXIDKfU7e>.

Officers have given further consideration to the priority for industrial areas as first priority for such uses. Although within Greater Cambridge it is unlikely that there will be many suitable sites, waste management uses are quite similar to industrial B2 and B8 uses, and can be housed within a building to reduce impact. Therefore there is no objection to this in principle.

The document which relates to Policy 4, does not however address the situation with regards to whether the site at Northstowe is required for waste management. Therefore it is proposed to submit a representation to ask for further clarity on this. This will not be an objection to the soundness of the plan and so will be submitted as a support with a comment seeking clarification. The proposed representation can be found in Appendix 2.

North East Cambridge

The North East Cambridge Area Action plan will be looking comprehensively at this part of Cambridge to be developed for housing, employment and other supporting uses and facilities as a new city district of Cambridge. Currently there is a waste management area (Veolia on Cowley Road), a transport infrastructure area (North East Cambridge Aggregates Rail Head and access road) and a water recycling area (which covers the water recycling centre) within this area. At the draft Plan stage, the Councils sought reassurance that these uses could be potentially relocated in order that they would not hamper development of the AAP.

In the Proposed Submission Plan the minerals and waste authorities have added additional text to Policy 10: Waste Management Areas which would allow for the relocation of the waste management facility, which may be incompatible with the other proposed uses in the AAP. Policy 11: Water Recycling Areas supports the relocation of water recycling centres, and Policy 15 Transport Infrastructure Areas (TIAs) permits relocation to a suitable alternative elsewhere. It is therefore proposed that all of these policies are supported, and the proposed representations are in Appendix 2.