

## APPENDIX 3

### Minerals and Waste Development Plan Core Strategy

Policy / Paragraph	Object/ Support	Comment	Suggested change
1.3.3  Page 3	O	Does not mention Natura 2000 sites – These should be included given they need to be Appropriately Assessed under new Habitat Directive.	Include mention of Natura 2000 sites.
2.4.15 –2.4.20 London apportionment  Page 23		<p>The East of England is required through the Government Planning Policy Statement 10 (PPS 10) to apportion between the waste planning authorities the amount of London’s commercial / industrial and municipal waste being exported to the Region from London.</p> <p>The apportionment exercise carried out on the total volume of imported waste from London to the East of England region results in Cambridgeshire and Peterborough being required to accommodate 26.3% of that total – this amounts to around 5.7 million tonnes of waste between 2006 to 2021.</p> <p>In assessing how much waste Cambridgeshire and Peterborough will have to deal with during the plan period an allowance for around 3 million tonnes of non-hazardous waste to be imported has been allowed for. There is a surplus of non-hazardous landfill once the locally generated waste of the plan area is considered and therefore Cambridgeshire has capacity for this imported waste.</p>	Note that the apportionment will be confirmed when the Government Office publishes the changes to the Regional Spatial Strategy for the East of England.

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Preferred option MW1 - objective and vision for minerals Page 27	○	2 <sup>nd</sup> bullet point says <i>where possible</i> biodiversity benefits. Why is this limited? This is contrary to PPS9 Biodiversity, which has a commitment to maintaining and enhancing biodiversity.	Remove the limiting words “where possible”.
Preferred option MW1 – Objective and vision for minerals Page 27	○	There is no mention of air quality in relation to minerals. The Region has a high level of fine particles and the LDF should therefore seek to minimise the contribution of fine particles from minerals and waste processes. A sustainable soil strategy as part of the LDF suite of documents would help to stabilise soils and reduce emissions of dust.	Include protection of air quality as a strategic objective in MW1.
Preferred option MW2 – Vision and objective for waste Page 30	○	There is no mention of air quality in relation to waste. The Region has a high level of fine particles and the LDF should therefore seek to minimise the contribution of fine particles from minerals and waste processes. A sustainable soil strategy as part of the LDF suite of documents would help to stabilise soils and reduce emissions of dust.	Include protection of air quality as a strategic objective in MW2.
Preferred option MW 3 - Sand and gravel extraction Page 35	○	Mineral extraction should be on less environmentally sensitive areas than river valleys. However it is recognised there is an opportunity for the after use to enhance recreation and biodiversity.	Mineral extraction should be on less environmentally sensitive areas than river valleys.

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Preferred option MW 3 –sand and gravel extraction Page 35	S	Support the policy that seeks to have balance between continuing extraction at existing sites and Greenfield sites.	
Preferred option MW 7-) recycled and secondary aggregates Page 44	S	<p>Support the principle of reuse and recycling of material on sites where development is taking place. The South Cambridgeshire LDF documents propose that planning applications for developments should recycle construction waste, including reuse of materials currently on the site, such as redundant buildings or infrastructure. This will be particularly relevant in the major developments, e.g. Northstowe and Cambridge East, where temporary on-site recycling facilities <i>may</i> be appropriate.</p> <p>Support policy where it says that suitable locations for permanent recycling facilities include general industrial land and waste transfer stations.</p>	Replace “must” with “may”. It will be a matter for the masterplanning process for each strategic development to determine appropriateness.
Page 53 Existing allocations	O	Object to the policy where it states that all strategic development schemes <i>must</i> now make provision for a temporary waste facility for recycling aggregates rather than <i>may</i> have to make provision.	
	O	The preferred option is that existing allocations will be subject to the same site selection procedure as ‘new’ sites. Areas of search allocated in existing Local Plan will be re-visited, as will the allocations in new development areas.	The Plan has not carried out a comprehensive search for potential sites for waste facilities.

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		<p>However S Cambs at the last consultation stated that the site search should focus on existing waste operations and brownfield sites, and should only consider greenfield sites where this is crucial for delivering the strategy and no more appropriate sites are available. Since the issues and options consultation the search for sites appears not to have been carried out considering existing and brownfield sites in a comprehensive way. Sites have now been allocated at the preferred option stage.</p>	
<p>Preferred option MW 15 Relocation of Milton Waste Water Treatment Works Page 58</p>	<p>○</p>	<p>A site-specific allocation is to be made in the SSP DPD. New criteria for choosing a site are listed as a result of the consultation exercise at issues and options. S Cambs asked for additional criteria to be included - visual impact, impact on Green Belt, the natural and built environment, including biodiversity, conservation and archaeology.</p> <p>Some of the additional criteria requested have been included. However, there is no reference to visual impact, impact on the built environment, including conservation. There is reference to nationally protected biodiversity but not other designated sites. These are important criteria, consistent with national planning policy guidance and should be included.</p>	<p>Include reference to visual impact, impact on the built environment, including biodiversity and conservation.</p>

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Preferred option MW 16 Waste management proposals outside of the allocated areas Page 59	O	In the absence of a clear strategy in the Core Strategy there is a danger that this policy will allow for additional facilities and thereby undermine the waste facility hierarchy.  Clarification needs to be given as to bullet (g) of the policy as to which strategic locations there are that are additional to the Structure Plan.	Once a clear strategy is in existence this policy could be used but without a strategy it could be a loophole to allow uncertainty in waste planning.
Preferred option MW 24 Borrowpits Page 82	S	Priority is to be given to maximising the use of secondary and recycled aggregate in the first instance before borrowpits are considered. The consideration of allocations for mineral working has had regard to the location of the growth areas. Therefore if borrowpits are used they will come from the allocations within the SSP DPD. This is to be welcomed.	Support this policy.
Preferred option MW 28 Safeguarding mineral resources Page 88	S	This policy seeks to safeguard against sterilisation of mineral reserves through the designation of Safeguarding Areas. Also Minerals Consultation Areas will be defined within which the Minerals Planning Authority will have to be consulted on any planning proposals. These will both be defined in the SSP DPD.	Support this policy.
Preferred option MW 29 Restoration and after-use of minerals working Page 91	S	Support the policy requiring restoration on a site-by-site basis.	Support this policy.

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Preferred option MW 31 Movement of waste Page 94	S	Support the continuation of the current policy intended to minimise the long distance transport of waste.	Support this policy.
Preferred option MW 33 Safeguarding Waste Management Facilities Page 100	O	Existing and proposed waste management facilities should continue to be safeguarded, but subject to a review of their continued suitability and that they are well located to serve the catchment area.	Existing and proposed waste management sites should only be safeguarded if their continued suitability is reviewed
	S	Agree that waste consultation areas should be established, where the waste planning authority would be consulted on significant planning applications which if approved may permit development that would adversely affect a waste management facility.	Support waste Consultation areas
Preferred option MW 34 Sustainable construction Page 103	O	Temporary waste recycling facilities will be required in strategic development areas including Northstowe. Clarification is needed as to what is meant by these areas. Is this the same as strategic growth areas as identified in SSP DPD figures 2 and 3?	Clarification is needed as to what is meant by strategic development areas.
Preferred option MW 34 Sustainable	S	Also a Waste audit is to be required on all proposals that are likely to generate significant volume of waste. The South Cambridgeshire LFD documents propose that planning	S Cambs supports the requirement for a Waste Audit, but clarification is needed as to

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construction Page 103		applications for developments should recycle construction waste, including reuse of materials currently on the site, such as redundant buildings or infrastructure. However, clarification is needed as to how the Waste Audit is calculated.	how this is calculated.
Preferred option MW 39 Protecting surrounding area - Routing agreements Page 118	○	<p>Routing agreements are seen as a good thing as a result of the consultation. However because these are usually done as legal agreements then no specific policy is to be included in the plan.</p> <p>Routing agreements will be a major issue, particularly for minerals traffic to development sites in the Cambridge Sub-Region. It is therefore of key importance to ensure that minerals and waste traffic does not cause harm to amenity in existing or proposed communities. This should apply to any temporary facilities during the construction of developments, e.g. facilities to handle construction waste, as well as for permanent facilities.</p>	Include a reference in the policy to the need for routing agreements to reduce the impact of traffic movements on the local community.
Preferred option MW 39 Protecting surrounding area Buffer zones Page 118	○	<p>Buffer zones are to be used but supported by guidance on indicative depths of buffer zones for different types of development in supporting text to any policy. To be called separation zones since buffer zone implies it is a no-go area whereas in fact certain activities are restricted or prohibited.</p> <p>It is unclear where this guidance will appear and against which policies since it does not appear to be part of either the Core Strategy or Site Specific Proposals DPDs as they are currently drafted. The guidance must be included within the Core</p>	<p>Details about buffer zones or separation zones as they are to be called, should be included in the preferred plan.</p> <p>The detailed guidance should appear in the Core Strategy.</p>

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		<p>Strategy DPD.</p> <p>Even if they are contained in a building, waste management operations are more akin to B2 than B1. Will noise / dust etc. escape when doors open to let lorries in? Lorry access is unsuitable for a facility, which is embedded within sensitive areas (e.g. new development areas).</p> <p>Buffer / separation zones will be needed wherever these facilities are provided to ensure that the impact of the site arising from such factors as transport, traffic and access, dust, odours, vermin and birds, noise, litter, and visual intrusion will be contained within acceptable levels.</p> <p>The guidance in the plan should set out the function of buffer / separation zones in particular circumstances which will vary depending on the nature of adjacent land uses, and potentially the type and size of the waste facility. This may include specific targets to be achieved e.g. X dba noise limit, and address the appropriate design and character of buffer zones in particular circumstances.</p> <p>This level of detailed guidance has not been incorporated into the plan as requested during the issues and options consultation.</p> <p>It would be for the applicant to demonstrate in the context of a</p>	

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		particular proposal, what width and design of buffer zone will meet the policy requirements.	
Preferred option MW 39 Protecting surrounding area Cumulative impact on communities Page 118	O	It is recognised that this is important but since this cumulative impact is addressed through Environmental Impact Assessment a policy has not been included in the Plan.	Include a reference in the policy to the cumulative impact of proposals being assessed through the EIA process.
Preferred option MW 53 Planning obligations Page 133	S	Mention is made in paragraph 6.19.3 of the possibility of working jointly with district and city councils to produce SPD as regards planning obligations guidance for minerals and waste developments.	Support joint working.
Paragraph 6.20.2 List of information needing to accompany planning application for waste or mineral development	O	Consideration for waste facilities should also consider how they fit into the waste hierarchy of policies - i.e. the waste strategy.	Add to list of considerations how a site fits into the waste strategy.

## Minerals and Waste Site Specific Proposals DPD

<b>Policy /Paragraph</b>	<b>Object/ Support</b>	<b>Comment</b>	<b>Suggested change</b>
1.6.3	O	Does not mention Natura 2000 sites – These should be included given they need to be Appropriately Assessed under new Habitat Directive.	Include mention of Natura 2000 sites.
2.3.2	O	In this paragraph there is a list of the policies set out in the Core Strategy. The 2 <sup>nd</sup> bullet point indicates that a spatial strategy indicating general locations for mineral and waste is included. A strategy for waste is not in this document.  Also 4 <sup>th</sup> bullet implies that the level of future provision for waste management is set out in the Core Strategy, which it is not clearly done. The Core Strategy has allowed for flexibility and by so doing has not provided a clear strategy for waste management.	Need for a clear waste management strategy to be included in plan.
Section 3.11 Page 30 – 35	O	There is no clear explanation as to the purpose of each of the waste facilities. Instead a reference is made to the Supplementary Planning Document (SPD) 'The Location and Design of Major Waste Management Facilities' adopted in April 2006. This provides detail on types of waste management facilities and their characteristics, including site requirements. Such basic information should be presented in the Core Strategy.	Details on each of the different waste facilities should be included in the Core Strategy.

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Section 3.11 Page 30 - 35		The site requirement information that appears in the SPD is especially important since this could give guidance on the best location for the facility in a particular area. For example where an area of search has been included as an allocation such as in North-West Cambridge these criteria could be used to assess the best location in the masterplanning process.	A policy needs to be incorporated into the Core Strategy to identify the criteria that will be used to assess the best location for a waste facility.
Preferred option SSP14 Waste safeguarding areas  Page 38	O	Preferred option SSP14 creates waste safeguarding areas, which will protect allocated waste sites. However in many of the growth areas around Cambridge no specific sites have been allocated and it would appear from the Proposals Map that these broad areas of search have not been safeguarded under this policy – rather the whole site is allocated under Preferred Option SSP10.	Clarify which waste sites are subject to SSP14.