

Minerals and Waste Development Plan Core Strategy DPD

Policy / Paragraph in Preferred Option 1 – December 2006	Comment made by S Cambs to Preferred Options 1 consultation - December 2006	Suggested change in December 2006	Whether amendment has been made in Preferred Option 2 documents 2008
1.3.3  Page 3	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.	No change made  (Page 9)
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</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.	<p>The amount required for Cambridgeshire and Peterborough to accommodate is now 22%. – This amounts to 5.1 million tonnes of waste between 2006 to 2026. After making an allowance for this 5.1 million tonnes and the indigenous needs of Cambridgeshire and Peterborough there is a deficit of non-hazardous landfill of between 647,000 tonnes and 4.9 million tonnes depending on whether scenario 2 or 3 is pursued.</p> <p>(Page 35) The MWCS has therefore allocated a site for non-hazardous landfill – however this site only has a capacity of 3 million cubic metres, which will not cover the existing shortfall. In paragraph 6.80 it states</p>

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	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.		that additional opportunities for landfill will come from the extraction of engineering clay. The MWCS should be identifying landfill sites to cover the shortfall rather than leave uncertainty.
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”.	Where possible has now been removed. Welcome this amendment. (Page 39)
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.	An additional objective has been added that states – To ensure that potential emissions are minimised as part of minerals development. This amendment is to be welcomed. (Page 39)
Preferred option MW2 – Vision and objective for	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	Include protection of air quality as a strategic objective in MW2.	There would appear to be no direct mention of air quality in the objectives although additional objectives have been added

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waste Page 30	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.		(Page 81)
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.	This policy does not appear in the new document. New policy CS2 indicates the total supply of sand and gravel that will be made in the Plan period and allocates three zones- Northern; Central/Southern and Earith/ Mepal. Strategic allocations are made which includes Cottenham/ Landbeach (Site CS2 B)  (Page 51)
Preferred option MW 3 –sand and gravel extraction Page 35	Support the policy that seeks to have balance between continuing extraction at existing sites and Greenfield sites.		This policy has been amalgamated into new Preferred option CS2
Preferred option MW 7-) recycled and secondary aggregates Page 44	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		The policy has been amended and now includes a list of strategic allocations for recycling which includes Waterbeach Waste Management Park, Waterbeach (Site CS5 C)

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	<p>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> <p>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.</p>	<p>Replace “must” with “may”. It will be a matter for the masterplanning process for each strategic development to determine appropriateness.</p>	<p>(Page 63)</p> <p>The sentence referring to all strategic development schemes ‘must’ make provision for a temporary waste facility has been removed. Temporary facilities are referred to in paragraph 4.74.</p>
Page 53 Existing allocations	<p>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.</p>	<p>The Plan has not carried out a comprehensive search for potential sites for waste facilities.</p>	<p>For recycling centres the locations of the preferred sites has been determined through the Waste Management Strategies. (Page 85)</p> <p>The County Council has carried out a</p>

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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>study of all the brownfield and industrial land in the Cambridge Area and assessed its suitability for a range of waste facilities including household waste facilities. The study concluded that no additional sites other than those already considered by the Minerals and Waste Plan were potentially suitable for waste facilities.</p> <p>Jacobs have been commissioned to assess the number of sites needed to meet demand in the future for other types of waste recovery sites and to determine their best location. The selection has looked at catchment areas. Travel times and distance has been a deciding factor.</p>
<p>Preferred option MW 15 Relocation of Milton Waste Water Treatment Works Page 58</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>Include reference to visual impact, impact on the built environment, including biodiversity and conservation.</p>	<p>Cambridgeshire Horizons have carried out a feasibility study on the redevelopment of the Cambridge Northern Fringe East and this concluded that comprehensive redevelopment on the entire site will not be viable in the foreseeable future. The draft Core Strategy DPD states in</p>

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	<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>paragraph 6.18 (page 88) “ ....the relocation of the Cambridge Waste Water Treatment Works is not deliverable and the works will therefore be retained on the current site. “</p> <p>However if a new waste water treatment works is needed in the future Preferred Option CS15 provides a criteria based policy to consider it. (Page 101). The first criteria mentions ‘suitable water course to discharge treated water’ but does not then include consideration of the likelihood of flooding resulting from this addition to the water course.- although consideration of the risk of flooding is considered in paragraph 6.57 . This concern should be included in the policy. (Page 100)</p>
Preferred option MW 16 Waste management proposals outside	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	Once a clear strategy is in existence this policy could be used but without a strategy it could be a	The County Council has carried out a study of all the brownfield and industrial land in the Cambridge Area and assessed its suitability for a range

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of the allocated areas Page 59	<p>hierarchy.</p> <p>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.</p>	<p>loophole to allow uncertainty in waste planning.</p>	<p>of waste facilities including household waste facilities. The study concluded that no additional sites other than those already considered by the Minerals and Waste Plan were potentially suitable for waste facilities.</p> <p>The network of household recycling centres has been considered by the Waste Management Strategy and is included in the adopted Household Recycling Strategy adopted by the County.</p> <p>Jacobs have carried out work to assess sites for inclusion in a network for different waste facilities</p> <p>.</p>
Preferred option MW 24 Borrowpits Page 82	<p>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.</p>	<p>Support this policy.</p>	<p>Priority should be given to use of secondary and recycled aggregates before the use of borrowpits – this is included in paragraph 4.84 (Page 70). This is to be welcomed. There is a strict list of acceptable conditions allowing for borrowpits in the Preferred option CS9.</p>

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			<p>Some borrow pits have also been allocated to serve specific road schemes notably the A 14. This will reduce the need for transporting of sand and gravel around the county. This is to be welcomed. However in the policy it states that the final lists of borrow pits relating to the A14 is to be confirmed with the Highway Authority (Page72 CS). If further sites are to be included that affect S Cambs then there should be further opportunity to comment on these.</p>
<p>Preferred option MW 28 Safeguarding mineral resources Page 88</p>	<p>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.</p>	<p>Support this policy.</p>	<p>The Mineral Safeguarding Areas are now much more extensive and their extent in defined in PPS1.</p> <p>MSA's are required to identify what are considered to be economic deposits of minerals –although there is no presumption that resources defined in MSA's will be worked. It is only for major developments that the MPA will have to be consulted. (definition of major included in plan – page 45)</p>

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			<p>For Mineral Consultation Areas it is all planning applications made that will be consulted with MPA except householder and adverts. Preferred option CS23 (page 135)</p> <p>This Preferred option does not include the exceptions that are included in the Site Specific Proposals DPD – it would be clearer if these were added rather than implying all applications will have to be consulted on.</p>
Preferred option MW 29 Restoration and after-use of minerals working Page 91	Support the policy requiring restoration on a site-by-site basis.	Support this policy.	No change - Support
Preferred option MW 31 Movement of waste Page 94	Support the continuation of the current policy intended to minimise the long distance transport of waste.	Support this policy.	No change – Support.
Preferred option	Existing and proposed waste management	Existing and proposed	Work has been carried out by Jacobs

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<p>MW 33 Safeguarding Waste Management Facilities Page 100</p>	<p>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.</p> <p>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.</p>	<p>waste management sites should only be safeguarded if their continued suitability is reviewed</p> <p>Support waste Consultation areas</p>	<p>to assess the best locations for waste facilities.</p> <p>The WPA must be consulted on <b>all</b> planning applications made in waste consultation areas not just on significant applications.</p> <p>The policy for waste consultation areas has been expanded to now include Waste Water Treatment Works Safeguarding Areas although it does not state in the policy that the WPA must be consulted for these additional areas- it is just implied. Wording in the policy should clarify this –Preferred option CS27 (Page 147). However in the Site Specific Proposals DPD Preferred Option SSP15 states that the WPA must be consulted on any planning proposal within a safeguarded area except householder applications or advertisements.</p>

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			A safeguarding area will be identified around existing and allocated WWTplants to prevent the encroachment of sensitive development.
Preferred option MW 34 Sustainable construction Page 103 Preferred option MW 34 Sustainable construction Page 103	<p>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?</p> <p>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 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.</p>	<p>Clarification is needed as to what is meant by strategic development areas.</p> <p>S Cambs supports the requirement for a Waste Audit, but clarification is needed as to how this is calculated.</p>	<p>Strategic development sites are now referred to as major development sites – no further definition is given.</p> <p>A waste audit and strategy is now required for <b>all</b> development proposals and a more general policy devised for waste minimisation.- Preferred option CS25 (page 142) No further advice is provided as to how the audit must be calculated. Reference is made to the recent requirement for Site Waste Management Plans for development over the value of £300,000 should be assist.</p>

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<p>Preferred option MW 39 Protecting surrounding area - Routing agreements Page 118</p>	<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>	<p>Include a reference in the policy to the need for routing agreements to reduce the impact of traffic movements on the local community.</p>	<p>Matters referring to traffic and highways are now included in a separate Preferred option CS28-Traffic and Highways-. This policy remains the same as was consulted on in December 2006. No mention is made of routing agreements in either the supporting text to this policy or CS31 – Protecting Surrounding Uses. (Page 155)</p> <p>The Council is now requesting a specific policy to be included in the MWCS on routing agreements .</p>
<p>Preferred option MW 39 Protecting surrounding area Buffer zones Page 118</p>	<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>Details about buffer zones or separation zones as they are to be called, should be included in the preferred plan.</p>	<p>The term separation zone has been replaced by buffer zone. Such zones will only be required where appropriate.</p> <p>Advice on appropriate depths for the buffer zone is still not included in the</p>

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	<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 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</p>	<p>The detailed guidance should appear in the Core Strategy.</p>	<p>DPD but refers to 'various sources including government guidance and research and the Council's SPD on the Location and Design of Waste Management Facilities.</p> <p>No further guidance is provided over buffer zones.</p> <p>Page 155</p>

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	<p>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 particular proposal, what width and design of buffer zone will meet the policy requirements.</p>		
Preferred option MW 39 Protecting surrounding area Cumulative impact on	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.	No change has been made in the policy. However paragraph 11.15 refers to assessing the likely impact of the proposals including those arising from the intensification of an existing development.

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communities Page 118			Page 154
Preferred option MW 53 Planning obligations Page 133	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.	No change – Support  (Page 180)
Paragraph 6.20.2 List of information needing to accompany planning application for waste or mineral development	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.	This consideration has not been included in the list. (Page 182)

## Minerals and Waste Site Specific Proposals DPD

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1.6.3	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.	This section has been amended in the Preferred options 2 draft and no paragraph remains referring to conservation sites. However paragraph 2.10 –2.15 outlines the Habitat Regulations Assessment work that has been undertaken in preparing the DPD.
2.3.2	<p>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.</p> <p>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.</p>	Need for a clear waste management strategy to be included in plan.	<p>The strategy for household waste recycling facilities has been produced in preparing the Household Waste Recycling Strategy. The County Council has now adopted this strategy. It was determined by the Waste Management Strategy. – This Strategy does not form part of this draft DPD and is not included in the Core Strategy or the supporting documents.</p> <p>The strategies for the other types of waste facilities were assessed by Jacobs using the Netwaste Site Selection.</p>

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<p>Section 3.11 Page 30 – 35</p> <p>Section 3.11 Page 30 - 35</p>	<p>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.</p> <p>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.</p>	<p>Details on each of the different waste facilities should be included in the Core Strategy.</p> <p>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.</p>	<p>No details have been included in the draft Core Strategy or the Site Specific Proposals DPD.</p>
<p>Preferred option SSP14 Waste</p>	<p>Preferred option SSP14 creates waste safeguarding areas, which will protect allocated waste sites. However in many of the growth areas around Cambridge</p>	<p>Clarify which waste sites are subject to SSP14.</p>	<p>There are still no waste consultation areas surrounding the preferred allocations if it is to be an area of search. This has been done because</p>

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safeguarding areas  Page 38	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.		the sites have not been specifically identified.