

APPENDIX 2

DETAILED COMMENTS ON THE LOCATION AND DESIGN OF WASTE MANAGEMENT FACILITIES SPD

Relevant section of SPD	Comments by South Cambs	Proposed change to SPD
Generals issues with SPD	It should be clear from the outset that this SPD is supporting policies in the current draft of the Minerals and Waste Development Plan (MWDP). And in this respect it is premature to be consulting on this draft SPD when the actual policies it is supporting are not yet finalised / adopted. It may have been more appropriate to consult on the SPD once the MWDP has been adopted. If the draft policies it supports are amended or deleted the SPD would have to be reviewed and consulted again at a later date.	
1.7	This mentions that information will be in other SPDs produced by City and District Councils. South Cambs Design Guide does not appear to cover recycling facilities/ bins within residential and commercial development. It has a section in Chapter 9 about recycling but this cross-refers to the County's RECAP Design Guide SPD.	Mention should be made here to RECAP Design Guide SPD being produced by County Council and Peterborough City Council.
1.14	The paragraph about Local Development Frameworks implies that District Councils are still preparing their LDFs. This is not the case. South Cambridgeshire District Council now has seven adopted Development Plan Documents and seven adopted Supplementary Planning Documents. The paragraph as currently worded is misleading. There is now only one policy that needs to be saved from the Local Plan 2004 – all other policies have been superseded.	Reword paragraph 1.14 to reflect the fact that District Councils are making good progress in the preparation of their LDFs and that many have adopted Development Plan Documents and Supplementary Planning Documents...

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1.13	The subsequent paragraphs giving information on supporting documents seems somewhat random. It may be better to put together all those that are produced by Central Government; Cambridgeshire County Council; Peterborough City Council and others with publication dates or if possible web- links to the relevant documents.	Amend section called ‘ Other relevant documents’ so that it is clearer who has produced the documents and where they may be viewed - web links to them?
3.0	Welcome that specific regard is being given to development in rural locations since much of S Cambs is rural in character.	
3.6	Reference should be made to relevant South Cambs SPDs e.g. Landscape SPD; Trees SPD; Design Guide? When the Council would be consulted on a waste facility within this district we could use our SPDs to inform our responses.	Include reference to relevant SPDs in this paragraph.
3.7	One of the criteria used for urban locations is that the waste facility be located so the HCVs do not travel through any residential areas. This consideration must also apply to rural locations – the fact that the facility is in the countryside should not mean that large vehicles in order to access the facility have to take a route through residential areas.	Add a key principle that the location should be selected to ensure that larger vehicles accessing the facility do not have to be routed through residential areas.
3.14	In urban edge locations consideration must be given to the needs of the existing communities adjoining the development sites.	Add to end of paragraph 3.14 the following ‘The needs of the existing communities living and working adjacent to major development areas or in urban fringe areas must also be taken into account when considering where to locate a new waste facility.’ Add a principle in 3.17 ‘ – The needs of the existing communities living and working adjacent to major development areas or in urban fringe areas must be taken into account

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3.18	Whilst recognising that the co-location of waste facilities has many advantages it increases the scale of the development proposed in an area. In a rural setting this could increase the impact of the development on the surrounding countryside both in terms of the appearance of the development and the potential traffic generated by the facilities.	Add to end of 3.18 the recognition that by co-locating waste facilities it will increase the scale of the development, which could impact more in a rural or urban fringe setting both in terms of the appearance of the development and the potential traffic generated by the facilities.
3.22 – Temporary Facilities	Welcomes the consideration of ‘Temporary facilities’ in the SPD.	
3.24	For ease of using the SPD it would be helpful if in referring to particular documents web links were included to where these documents may be accessed as is done in relation to landscape matters at paragraph 4.24 of the SPD. It should also be clear who has published the documents.	Include web links to documents if they are mentioned in the SPD and also who has published them.
4.1	South Cambs welcomes the idea that a design brief must be prepared prior to the commencement of any detailed design work. If a development were within our District we would wish to be consulted on this brief to ensure that the development meets our planning considerations.	Add to paragraph 4.1. ‘The Local Planning Authority will be consulted on this design brief to ensure that the development meets their planning considerations.’
4.11	Welcomes the fact that local distinctiveness must be considered in the design of waste facilities.	
Lighting 4.15 - 4.22	Welcome consideration of lighting impact	
Noise - 4.34 – 4.35	<p>Welcome consideration of noise in SPD and reference to PPG 24 Planning and Noise.</p> <p>Waste Management Sites have potential to cause significant and complex noise impact.</p>	

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	<p>Refers to a <i>noise report</i>and <i>appropriate mitigation measures</i>.....but does not detail that 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.</p> <p>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. Reference to actual dB noise levels should be used with caution as these levels can be misleading and understate impact.</p> <p>They have been revised and there are new Night time Guidelines for Europe both of which recommend lower noise levels depending on environment to be protected. For example 55dB is now considered as likely to cause serious annoyance in external amenity areas. Noise levels are relative to existing. A 10 db increase above background is a positive indication that complaints are likely.</p> <p>There are also potential impact dB max levels which are particularly disturbing.</p> <p>Table 4.35 Key Principles not an exhaustive list</p>	<p>Provide detailed explanation of purpose of noise report to safeguard amenity and minimise noise disturbance.</p> <p>Remove any reference to actual dB noise levels and simply state that noise will be assessed on a site by site basis on its merits having regard to local circumstances. Simply refer to assessment in accordance with PPG 24 methodology and recommended noise guidance in WHO and best practice such as British Standards.</p> <p>Recommend that footnote stating that list is not exhaustive and best practical means will be used to mitigate noise impact may include an all encompassing Site Noise Management Plan to include key principles</p>

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	<p>No reference to off site noise such as traffic movements and routing which can be a concern to local communities</p>	<p>listed</p> <p>Reassurance that indirect off site noise issues such as any off site traffic movements will also be considered.</p>
<p>Air quality – 4.36-4.40</p>	<p>Welcomes consideration of air quality in SPD</p> <p>First sentence refers to dust.....from traffic. Narrow scope.</p> <p>Mitigation to include filters is confusing as various types of abatement technology?</p> <p>4.38 states that “Locating facilities inside buildings with biofilters, could reduce this distance”? The meaning of this sentence is not clear in what context is distance being used. What distance could be reduced?</p> <p>Windrow composting or similar can raise particular concern in terms of bioaerosols and this should warrant special mention.</p> <p>No mention of how energy requirements will be met / achieve and any impact on air quality objectives. Particular</p>	<p>Should be on and off site dust etc from traffic and on site operations.</p> <p>Mitigation / abatement measures available depend on the abatement technology available relative to physical and chemical composition of emission / pollutant.</p> <p>Clarification required in terms of what distance.</p> <p>Refer to Env Agency position statement on Composting and the Potential Health Effects from Bioaerosols and it should be stated that any application is likely to need a site specific bioaerosol risk assessments and odour risk assessment / dispersal modelling.</p> <p>Statement that energy requirements will have due regard to emissions and pollutants under national air quality</p>

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	concern if biomass used and if near air quality management area.	objectives.
Water – 4.41-4.44	Welcome consideration of water in SPD	
Pest Control – 4.45	It would be helpful to include a contact / web link to the appropriate section of the Environment Agency who deals with pest control.	Add appropriate contact details for Environment Agency.
4.46	Need to more details / web link to the document mentioned in this paragraph – ‘Secure by Design’ published by ACPO.	Add more details about the publication ‘Secure by Design’
Energy Efficiency and Sustainable Construction – 4.50 –4.59	Welcome consideration of these matters	
Chapter on Facility Guidelines	This is a useful chapter to understand the needs of the different forms of waste management facilities.	
5.3	Concern at the consideration of locating of a Materials Recovery Facility as being appropriate for location within a major development as is stated in this paragraph.	Comment should be provided on whether the environmental impact is compatible with residential development.
5.6	Concern at the locating of a In Vessel Composting Facility as being appropriate for location within a major development as is stated in this paragraph. Such facilities generate high volume of HCVs.	Due regard should also be given to Environment Agency position statement Composting and the Potential Health Effects from Bioaerosols. specific bioaerosol risk assessments should continue to take place if the proposed site is within 250 metres of sensitive premises.
Design checklist	There should be a question asking whether the needs of the existing community adjacent to a proposed waste facility	Add a question asking whether the needs of the existing community adjacent to a proposed waste facility

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1. Siting	development has been taken into consideration.	development has been taken into consideration.