

**APPENDIX 3  
DETAILED COMMENTS ON THE RECAP WASTE MANAGEMENT DESIGN GUIDE**

<b>Relevant section of SPD</b>	<b>Comments by South Cambs</b>	<b>Object/ Support/ Comment</b>	<b>Proposed change to SPD</b>
Cross referencing within SPD.	Cross referencing – Within the SPD there are many cross references which would be clearer to understand if a page number and /or a paragraph number was included so it was easier to find your way around the document.	C	Cross-referencing should refer to the relevant paragraph number / page number to make using the document more user friendly.
Toolkit	<p>If it is expected that a toolkit be completed by every developer submitting a planning application consideration needs to be given to the format of the SPD so that it is easy to find and use. Currently it is difficult to identify the section, which is the Toolkit.</p> <p>Consideration should be given to putting the Toolkit section at the end of the SPD so that it is easier to find and it could have a different coloured font or background so that it is differentiated from the rest of the SPD. A pocket could be included in a page version of the SPD and the Toolkit placed within it as an easy to find and use item of the SPD. On an electronic version it could be identified separately to the main SPD and be possible to interactively fill in the information. It is important that it can be easily extracted and completed as required.</p>	C	<p>There needs to be consideration of how the Toolkit section fits into the SPD.</p> <ul style="list-style-type: none"> <li>- The Toolkit section could be placed at the end of the SPD</li> <li>- Consider using a different coloured background or font</li> <li>- A paper version of the SPD could include a pocket to contain a Toolkit as a separate document.</li> <li>- An electronic version of the SPD could have the Toolkit as a separate document and make it easy to interactively complete the forms and submit them.</li> </ul>

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	<p>The checklist is referred to early in the SPD, therefore could be a 'user-friendly' extracted document as an appendix, especially important for the electronic version to be able to</p> <p>It is not obvious the toolkit CHECKLIST is ultimately being introduced because of the emphasis on the toolkit components. It is not immediately apparent that the breakdown will follow.</p>		
Executive Summary 1.	Only refers to funding and provision of appropriate containers and without any justification	C	The draft SPD should make clear that as a general principle developers would be expected to contribute towards any additional costs incurred by the local authority arising out of residential developments.
Executive summary – paragraph 11	Within this section mention is made to Circular 05/2005 – This should read 'in accordance with Planning Obligations Circular 05/2005...' And all other references to this circular in the SPD should be displayed as such.		Mention of Circular 05/2005 should read as 'in accordance with Planning Obligations Circular 05/2005...'
Introduction 1.1	<p>A specific objective of the SPD must be to assist in achieving policies set out in the MWDP. The SPD can only provide guidance – it cannot create new policies. This must be stated clearly in this introduction.</p> <p>Whilst recognising that the design guide was</p>	O	Reword the introduction to emphasis that the SPD is supporting policies in the MWDP.

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	published in a different format some while ago it must now as an SPD be primarily supporting policies in the MWDP. The review of the guide should not just be considering whether it is consistent with the MWDP but how it supports policies in the MWDP.		
Purpose of the Guide 1.4.2	<p>A SPD cannot be a strategic tool. It can only provide guidance/ support to adopted policies in the MWDP.</p> <p>The word ' development application' would be clearer if it were referred to as a planning application</p>	O	<p>Remove the words ' a strategic tool' from the second purpose of the guide and replace with the words ' guidance'.</p> <p>Replace the word ' development ' with ' planning '.</p>
1.4.4	It must be recognised that for different scales of development there will be varying levels of contributions required. A developer should be able to pick up the SPD and have a clear idea of what contributions are expected.		<p>There must be information in the SPD so that it is clearly set out when developers will be expected to contribute.</p> <p>The draft SPD should make clear that as a general principle developers will be expected to contribute towards any additional costs incurred by the local authority arising out of residential developments.</p>
1.4.5	The wording of this purpose seems to imply that it is possible for the SPD to provide detailed information for developers about financial implications of providing for waste facilities. This needs to be reworded		Amend 1.4.5 along the lines of...' Highlight to developers that there will be financial implications relating to the provision of waste management infrastructure. These will vary according to the nature and scale of the proposed development and associated supporting infrastructure and will be based on any additional costs likely to be incurred by the local authority arising out of the proposed development.'

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1.5 Waste Audit	<p>This paragraph introduces a subject that does not seem to relate to the preceding paragraphs. Is a waste audit to be a purpose of this SPD? If not why is it in this section? This paragraph should be rewritten to explain clearly what a waste audit is</p> <p>Should this in actual fact be a reference to a waste strategy rather than a waste audit which will then be used by the developer to demonstrate their proposals for meeting the requirements of the Guide (a waste audit will not do this as it presumably simply shows what waste needs to be dealt with, not how it will be dealt with?). 'Waste Audit' and 'Waste Strategy' should be defined in the Glossary.</p>	C	Consideration should be given to why mention is made to a waste audit at this stage. A clearer explanation is needed of what a waste audit is and justification of it appearing here in the purposes section of the SPD.
1.6 MWDP policies	It must be more clearly stated that the Guide is supporting these policies. As written the guide just launches into mentioning these policies without any explanation. At the very least there should be a paragraph explaining how these policies relate to the SPD rather than just listing them.	O	There must be a clearer explanation of why these policies from the MWDP are listed in this SPD.
1.11 Basis for Conditions	Throughout the SPD mention is made to ' Basic Conditions and Agreements' and at no point are this term explained clearly. (Mentioned in Table 1.1 page 9; paragraphs 4.8; 8.11; 9.7;		Explanation as to what is meant by ' Basic Conditions and Agreements' when it first appears in the SPD on page 9.

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	9.10;Table 11.1.)		
1.14 Consultation.	Mention is made of the Cambridgeshire Design Guide for Streets and Public Realms and the consultation process included in this is suggested as the one to follow with this SPD.	O	It is not considered that the consultation process included in the Cambridgeshire Design Guide for Streets and Public Realms has any relevance to this section and any reference to it should be removed.  The 1 <sup>st</sup> sentence should be amended with the words 'including pre-application discussions by the developer' inserted after 'on timely consultation...' Consultation should be with the Local Planning Authority.  The 2 <sup>nd</sup> sentence 'In most cases, consultation...' should be removed.
1.14	It is presumed that the reference to the relevant Local Authority is meant as the Local Planning Authority. South Cambs would support that early consultation is important when a developer is considering submitting a planning application. South Cambs encourages developers to take part in pre-application discussion with the planning officers.	O	Include reference to importance of pre- application discussions to ensure that developers are aware of SPD and requirements for waste management before a planning application is submitted.
1.16	Mention is made of Assessment criteria but it is not stated where these are to be found.	C	Need for clear cross referencing of where Assessment Criteria can be found page 41 in Waste Management Toolkit Section 11
Part 2 Policy and Context	Whilst there is reference to policy there should be additional reference to relevant and related legislation and guidance. Useful reference and benchmark.	C	Refer to The Building Regulations Approved Document H, Drainage and Waste Disposal (2002 edition), Part H6 Solid Waste Disposal, and British Standard BS5906:2005 'Waste management in buildings – Code of practice'

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			<p>They establish general principles for location and design of waste storage facilities for various forms of development, including access (for users and the collection authority). They also contain detailed technical guidance on the provision and location of waste facilities.</p> <p>For example BS 5906 In section 4 sets out general principles of the design of facilities, stating that:  'Designers should consider:</p> <ul style="list-style-type: none"> <li>- easy and safe access for waste producers, including older persons or persons with disabilities;</li> <li>- easy and safe access for collectors and collection vehicles;</li> <li>- location and space (including avoidance of opportunity to cause nuisance or injury);</li> <li>- protection against animal scavenging of waste;</li> <li>- aesthetics of the development;</li> <li>- noise (e.g. glass handling);</li> <li>- ease of maintenance, including cleaning;</li> <li>- robust construction;</li> <li>- safety from fire risk and smoke;</li> <li>- lighting;</li> <li>- ventilation;</li> <li>- sound insulation; and</li> <li>- special requirements (e.g. separate storage and collection of healthcare waste and bulky waste)</li> </ul>
2.2	No mention of who has produced this strategy?	C	Need to include mention of who has prepared this strategy and

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Waste Strategy	Government department? Can a web link be placed in this document to direct the reader to the strategy?		a web link to it if available. Suggest DEFRA Waste Strategy for England 2007 should be referred in subsequent sections as 'The 2007 Strategy' to differentiate it from other strategies e.g. waste management strategy.  <a href="http://www.defra.gov.uk/environment/waste/strategy/strategy07/documents/waste07-strategy.pdf">http://www.defra.gov.uk/environment/waste/strategy/strategy07/documents/waste07-strategy.pdf</a>
2.4	Unclear what is meant by the reference to Part 3 in the brackets? It may be clearer to call the sections/ parts of the SPD chapters then it would clarify what is in SPD and what is in Tool kit.	C	Need for cross referencing of Part 3 – page number 15
2.2 ; 2.6; 2.7; 2.11; 2.12	Again it would be useful to have a web link if possible to each document.	C	Need to include a web link if available
2.12	Need to have an indication of who has produced the East of England Plan and a brief description of what this plan is. The plan not only includes policies about waste but also detailed policies about the Cambridge Sub-Region indicating housing numbers.  Need reference to current review of East of England Plan.		Need to mention that the East of England Plan is prepared by the East of England Regional Assembly (EERA), which is the regional planning body for the East of England and has a statutory duty to prepare and implement the Regional Spatial Strategy known in this region as the East of England Plan.
2.14	It is confusing to have supporting text for the policies in the East of England Plan in bold type – the same as is done when quoting from the actual adopted policies.	C	Need to differentiate clearly between what is policy and what is supporting text in the East of England Plan.
2.17	The detailed definitions of what is meant by Development Plan Documents etc should be	O	Remove the definitions of DPDs; SPDs and SCI into a glossary or appendix.

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	included in an Appendix or glossary and does not appear to be relevant here.		
2.18	There should be a clearer definition of what the Minerals and Waste Development Plan is and the documents it will include. These are currently out for consultation so at a further stage than is implied in the last paragraph on page 18 'are drafting ...'		Include a clear description about the Minerals and Waste Development Plan and the stage in preparation it has now reached. – Proposed Submission.
2.21-2.24	Could a web link be included to each of these documents?	C	Include a web link for each document.
2.22 Cambridgeshire County Council Household Recycling Centre Strategy	It is not clear who it was who adopted this Strategy in December 2006 and what status does it has in planning terms.	C	Need to include who adopted this Strategy and its planning status.
2.23 Cambridgeshire Design Guide for Streets and Public Realm	It is not clear what the planning status of this document is? Has it been adopted as a Supplementary Planning Document by the County Council?	C	Need to clarify planning status of this document.
2.25	If it is the intention for the SPD to be adopted in June 2011 why was it consulted on so early before the MWDP has been adopted?	C	
3.1	There needs to be mention in this section of the fact that Cambridgeshire comes within the area identified by Central Government as an area where there will be a step change in growth and	O	Need to describe the step growth in housing that is planned for the Cambridge Sub Region in the East of England Plan.

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	that this is planned for in the East of England Plan up to 2021 and beyond. It is not just the 'popularity of the area' that has led to an increase in its population but it has been specifically identified as a growth area where there will be a planned step increase in house building.		
Generation of municipal waste section Page15	Much of the information about waste at the local level and national targets is included in the MWDP and does not need to be repeated in detail in this SPD.	O	Amend section that is outlining waste at a local level and the national targets since this is repeating information contained within the MWDP.
3.6	The first paragraph is confusing and in the wrong tense. It states that there will be an increase in waste in 2005 – surely we will know this now I 2010?	C	Amend first paragraph.
External storage capacity 4.7	It states that as a minimum developers will be required to provide that appropriate amount of space.....However if there is a proven need what penalties are there if a developer does not pay for additional waste capacity ?		Need for clarification.
Part 5 page 23	Need for paragraph numbers in this part/ chapter of the SPD.	C	Include paragraph numbers in this part of the SPD.
Part 5: Waste Storage Points	No reference to noise and odour associated with storage. The Design Standard checklist (which has been included as a supplement on the consultation version of the SPD to be inserted after paragraph 11.9) and assessment guidance sheet refers to protection of		Include paragraph to highlight these issues e.g. - The siting and design of bin storage areas and in particular communal and underground storage including screened hard-standings and enclosed stores, should also have regard to the impact of noise and odour nuisance etc on the occupiers of neighbouring properties, existing and proposed. Should have basic lighting

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	Environment –Nuisance and Amenity		and should have drainage facilities to assist cleaning.
Page 26 Collection frequency	It may be better to suggest at this point that to find out information on the frequency of collections that developers contact the relevant individual local authorities. By including an appendix with the latest information this may become out of date and could not easily be amended. It would take some time to review the SPD due to the procedures that are have to be followed as it is an official planning document.	C	Amend the paragraph on Collection Frequency so that developers should contact the relevant waste collection authority to find out about the current collection frequencies.  Delete 1 <sup>st</sup> sentence ‘ Current collection frequencies...’
Part 6 Waste Storage Infrastructure	This section should be restructured so that it deals clearly with above ground storage (design and construction) and underground storage (design and construction).  No mention is made of Appendix D, which indicates the design specifications for a storage compound and should be mentioned near the beginning of this part of the SPD.  An additional section must be included in this part about what should be considered in the design of a storage compound. At present the design specifications are included in Appendix D. A summary of this should be within the main body of the SPD	C	Restructure this section of the SPD so that the information relating to above-ground and underground storage is placed together.  Mention should be made of Appendix D in paragraph 6.3  A summary of Appendix D should be included in Part 6 of the SPD.
6.3	An additional general principle should be	C	An additional general principle should be added to consider

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	added. The design of waste storage compounds should consider the local character and should be designed to fit in with its surroundings. Whilst appreciating that such compounds must be functional consideration must be given to their appearance. 'The Location and Design of Waste Management Facilities SPD' uses the term 'local distinctiveness'.		the appearance of the waste storage compound and how it fits in with its surroundings. I.e. Sensitivities to Urban Design considerations/ Local Distinctiveness.
6.12	This should be reworded to highlight the construction outcomes to be achieved e.g. easily cleanable, accessible, proof against rodents, easily ventilated etc		This should be reworded to highlight the construction outcomes to be achieved e.g. easily cleanable, accessible, proof against rodents, easily ventilated etc
7.3 Key aspects of highway design	Whilst agreeing that highway design is a key to vehicles collecting waste in a new development there are a number of other considerations that sometimes may conflict with this, such as street design and local character. Although mention is made in the introduction paragraphs 7.2 to the Cambridgeshire Design Guide for Streets and Public Realm this section should include reference to the need to consider local character in highway design.	O	Include consideration of street design and local character and specific reference to Cambridgeshire Design Guide for Streets and Public Realm with web link
Part 8 Household Recycling Centre	The future planning of this is contained within the MWDP and therefore this section should be re-written to reflect what is included in the current MWDP.	C	The future planning of this is contained within the MWDP and therefore this section must reflect what is included in the current MWDP.

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8.7- 8.11			
8.8	It would be clearer if the actual policy relating to HRC were included in this paragraph since it relates directly to this section.		Include Policy CS16 in this paragraph.
8.9	Is there a threshold of number of houses in a development when a developer will have to contribute to a HRC? Or will this depend on where the housing is to be and what the existing provision of recycling there is. At present this does not give any idea of what contribution may be expected. Has the County Council produced any guidelines that may assist in negotiations? This information should be included in the SPD.		Need for clarity in what size of development would attract contributions to a HRC. The SPD should include further information on when contributions may be asked for.
Part 9	It must be clearly stated that Bring sites are the responsibility of District Councils.		
9.2	What is the definition of '1 Bring site' – i.e. how many containers etc? Is it the same across all Local Authorities?  Are there any accessibility standards to consider regarding the location of Bring sites (i.e. all residents should live within 'x' metres of a Bring site etc)?		Need for clear definition of a Bring Site and where this is the same for every Local Authority.  Should include any accessibility standards especially as this may help a developer consider these sites in the waste audit for a new development.
9.6	Mention is made that the location of Bring Sites should be included by a developer in a waste audit. –		There will need to be further information available about bring sites and where developers can find out about the existing provisions within a district if this is to be included in a waste

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	<p>How are developers to understand the capacity contained within existing bring site provision? Should there be a statement explaining how District Council will publish this information?</p> <p>Should there be sufficient capacity to incorporate new residents (ie existing bring sites are under used ) then presumably no contribution would be sought?</p> <p>What occurs in the scenario where there is insufficient bring site space to cope with existing demand ? The applicant is not required to alleviate existing issues therefore what is the calculation for the section 106 contributions?</p>		<p>audit.</p> <p>There needs to be clarity in the SPD as to how section 106 contributions will be calculated.</p>
9.7	<p>Need for clearer guidance for developers where possible as to thresholds and location criteria as to where a bring site should be located. Otherwise there will be lots of negotiations on a site-by-site basis and need for continuity.</p>		<p>Suggest making it clear that these will vary according to the nature and scale of the proposed development and associated supporting infrastructure and will be based on any additional costs likely to be incurred by the local authority arising out of the proposed development. Each development will have to be individually assessed. Early pre-application consultation with the Local Planning Authority is therefore essential.</p>
9.8	<p>The requirement for one Bring site facility per 800 households should be more clearly highlighted in the text. Also the requirement for a temporary site on the occupation of the 50<sup>th</sup> property At present this is all lost in the paragraph and</p>		<p>Highlight the requirement for one Bring Site facility per 800 households as a separate paragraph in bold text.</p> <p>Highlight the requirements for a temporary site.</p>

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	yet it is an important requirement.		
Part 10	South Cambs welcomes the consideration of education schemes to encourage recycling and waste reduction. However this information could be placed in an appendix rather than in the main body of the SPD.		Put Part 10 as an appendix of the SPD.
Toolkit	There needs to be clarification of whether it is expected that all scales of both residential and commercial development would be expected to use the toolkit...This is a requirement of Policy CS28 and it may be clearer to have this stated at the beginning of this section of the SPD..		Make clear that all developments will require submission of the Toolkit with supporting information proportionate to the nature and scale of the development.  Clarify how Toolkit will be used and that it must be submitted with each planning application. Stress again importance of early pre-application consultation with LPA
11.1 How to use the guide.	If the Toolkit is to be an extractible easy to use element of the SPD there would need to be additional wording included in the introduction to the toolkit so that it can stand alone		Add information as to what toolkit is and where it is applicable so that if it becomes a stand-alone document there is sufficient information within it to explain what it is and how to use it.
Part 12  An integrated approach to waste management in flats and apartments	It is a good section as it considers future development and encourages exemplar projects but is disjointed from the rest of the SPD. It does not sit well in this section of the SPD.  Suggestion that it could be best put in as an appendix or it could be introduced as a separate section earlier in the document, e.g. previous to section 10.		This section should be placed either as an appendix to the SPD or before section 10.

