

**CAMBRIDGESHIRE AND PETERBOROUGH MINERALS & WASTE SITE  
SPECIFIC PROPOSALS DPD**

**INSPECTOR NOTE 2**

**Allocation W1X**

Household Recycling Centre

South of Addenbrookes Access Road, Cambridge

During the course of the Hearings I indicated to the Councils my concerns with respect to the soundness of this allocation. I also said that, in the event that I were minded to recommend that the allocation should be removed from the Plan on grounds of unsoundness, I would inform the Councils and provide the opportunity for comment.

Having considered the written evidence, including the additional response from the Councils to my earlier expressions of concern, together with what I heard at the Hearings and what I saw on the site visit, I am now in a position to say that I am minded to find this allocation unsound; and that, as things stand, it is likely that I shall be recommending its removal from the Plan.

My reasons for reaching this conclusion are as follows:

1. The Addenbrookes Access Road forms a firm, hard boundary between the urban area of Cambridge and its rural surroundings to the South. Permission has been granted for residential development up to the northern side of the road (Glebe Farm) and this is likely to be built in advance of the provision of the proposed facility. The site allocation would take built development well beyond that boundary, which has been defined through the Local Plan process. The Inspector who held the Inquiry into the Cambridge Local Plan said (Para 9.18.10): *"The road and housing would form a new urban edge, with the opportunity to improve the character and appearance of this interface between the City and countryside. The proposed strip of housing would be an acceptable addition to the built-up area considered in the context of the new road and the large area of Green Belt remaining outside the line of the road"*. The Local Plan (para 4.5) identifies compactness as one of the characteristics of the city. There is no doubt in my mind about the purpose of identifying the boundary and of its importance to the objectives of the Local Plan. The proposed allocation would compromise those objectives.
2. It is inherently undesirable - to say the least - that an allocation in one Plan should be inconsistent with a principle or objective of another. Paragraph 4.45 of PPS12 says in the context of deliverability that plans should ensure that *"... what is in the plan is consistent with other relevant plans and strategies relating to adjoining areas ..."* and *"should be coherent with the core strategies prepared by neighbouring authorities where cross-boundary issues are relevant"*. Though this is stated by reference to core strategies, its thrust logically applies equally to site allocations.

3. The site is in the Green Belt and there is no dispute that the proposed use would amount to inappropriate development in the Green Belt sense. 2 of the 5 purposes of including land in the Green Belt listed in paragraph 1.5 of PPG2 are: *to check the unrestricted sprawl of large built-up areas* and *to assist in safeguarding the countryside from encroachment*. The land in question clearly fulfils both purposes. Its development as proposed would be contrary to them.
4. A further purpose listed is to preserve the setting and special character of historic towns. Cambridge is an historic city which has a special character, but its historic centre is not visible when approaching from the south in the vicinity of the site. Rather, the appearance of the urban fringe here is one of modern development, including well-lit major roadways and substantial and extensive development. However, insofar as Cambridge has historically kept a clear distinction between the city and the flat rural area which provides its setting, and maintained this by the firm boundary defined in the Local Plan and on the ground, the proposed facility would also be contrary to that purpose. In this connection, I would regard the setting of the city as being a heritage asset by reference to the definition in PPS5, which includes: *a place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions*. It appears that this consideration was not fully taken into account when assessing the merits of alternative sites.
5. Paragraph 1.6 of PPG2 defines 6 objectives for the use of land in the Green Belt. The proposed facility would not contribute to the achievement of any; and would directly militate against 2: *to retain attractive landscapes, and enhance landscapes, near to where people live; and to retain land in agricultural, forestry and related uses*.
6. Paragraph 1.4 of PPG2 say that *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness."* Whether openness is defined by reference to absence of development or exposure to view, it would be significantly reduced by the facility proposed. Planting in time might limit views of the building and activities but could in itself be a discordant feature in the flat open landscape.
7. In relation to all of the Green Belt matters, though location was taken into account in the site assessments, it is uncertain whether the degree of harm to the Green Belt, its purposes and objectives was assessed.
8. A considerable proportion of the Waste Consultation Area for the site allocation includes land which is to be developed for housing. Paragraph 10.23 of the Core Strategy says that *"New neighbouring development can impact on waste management sites and make it*

*problematical for them to continue to deliver their important function". Paragraph 10.26 adds that " ... other forms of occupied development may be incompatible with waste management development and prejudice existing or future operations". In short, this recognises the potential incompatibility of waste management uses with residential development. In my view, the proximity of the proposed facility to the future Glebe Farm housing – some of which will have a frontage to Addenbrooke's Access Road directly opposite the facility and its access – is incompatible with the purpose of identifying Waste Consultation Areas and hence with the proposed allocation. This is both from the point of view of protecting residential occupiers from the environmental effects of the facility and in order to prevent future prejudice to the operation of the facility.*

9. In terms of deliverability, although the land is available it is highly likely that there will be significant objections to a planning application for the facility: from the City Council, English Heritage and from local residents. With respect to the latter, I would expect the level of opposition to be greater than that to the proposed allocation, since by that time the Glebe Farm development would be occupied. Though I cannot predict the outcome of any application, there is insufficient certainty that it would be forthcoming.
10. Having regard to these matters, I take the view that the proposed allocation is potentially unsound by reference to:
  - lack of consistency with national policy with respect to the Green Belt and PPS5;
  - lack of conformity with the objectives of the Cambridge Local Plan;
  - lack of consistency with the purposes of identifying waste Consultation Areas in the Core Strategy;
  - doubts over the robustness of the assessment of the site with respect to the effect on the setting of the city; and
  - doubts over the deliverability of the facility, and thereby the effectiveness of the allocation.

In reaching these conclusions, I acknowledge the very considerable work that has gone into identifying the site and that all available sites considered were in the Green Belt. I appreciate the need for a new facility, not least to serve the needs of the future occupiers of new housing locally. I am of course aware that in terms of sustainability, the site would be well-placed to serve its intended catchment. I also note the Councils' commitment to high quality design through their Supplementary Planning Document. Judgments with respect to the Green Belt and heritage assets are explicitly on balance; and so is the overall question of soundness.

But the Councils have conceded that the case for this allocation is finely balanced. Moreover, there is no pressing need to make replacement provision in the early years of the Plan. Indeed, it appears that owing, amongst other things, to the slow-down in development locally and the funding of the facility being at least in part by way of developer contributions, provision would be made later than initially planned. Though the present household recycling provision for South Cambridge is less than ideal, it is acknowledged to be presently adequate. The argument in favour of the site in terms of need is thereby reduced. In any event, need is something that would apply equally to any site. It does not particularly support the proposed allocation.

I now turn to the way forward. As things stand, I am minded to recommend that the allocation be removed from the Plan. I am prepared to accept further representations from the Councils in response to this note and to hold an additional Hearing if the Councils consider that they may be able to present more convincing evidence. I would involve representors in that process, should they wish to contribute. However, in fairness to the Council, having aired the subject extensively during the Hearings and having already received a response to my earlier expressions of concern, I have my doubts about whether this would be particularly productive.

An alternative would be for the Councils to seek to withdraw the allocation voluntarily by way of a Change. Please let me know your views on this.

As you know, I heard representations at the Hearings concerning an alternative site, or at least an area of search, at Hauxton; and I viewed it on my site visits. At present I am not minded to allocate it as a substitute for W1X since it too suffers from a number of drawbacks and I have insufficient information to determine whether, in the terms of PPS12, it would represent the most appropriate strategy when considered against the reasonable alternatives. In reaching this conclusion, I have also had regard to the lack of pressing need for, or ability to provide the facility in the short to medium term. Rather, a more measured approach would be for the Councils to promote a site within the context of a partial review of the SSPDPD in due course.

Please could the Councils respond to this note by the end of next week (22nd July). The detailed arrangements for taking the matter forward may then be made.

*Jonathan G King*  
Inspector

14<sup>th</sup> July 2011



**CAMBRIDGESHIRE AND PETERBOROUGH MINERALS AND WASTE  
SITE SPECIFIC PROPOSALS PLAN**

**STATEMENT BY CAMBRIDGESHIRE COUNTY COUNCIL AND PETERBOROUGH  
CITY COUNCIL IN RESPECT OF INSPECTOR NOTE 2**

**ALLOCATION W1X: HOUSEHOLD RECYCLING CENTRE SOUTH OF  
ADDENBROOKES ACCESS ROAD, CAMBRIDGE**

**July 2011**

**Cambridgeshire County Council and Peterborough City Council – Officers response to Cambridgeshire & Peterborough Minerals and Waste Site Specific Proposals (SSP) Plan, Inspector Note No. 2**

*Extract: I am minded to recommend that the allocation [W1X] be removed from the Plan. I am prepared to accept further representations from the Councils in response to this note and to hold an additional Hearing if the Councils consider that they may be able to present more convincing evidence. I would involve representors in that process, should they wish to contribute. However, in fairness to the Council, having aired the subject extensively during the Hearings and having already received a response to my earlier expressions of concern, I have my doubts about whether this would be particularly productive.*

*An alternative would be for the Councils to seek to withdraw the allocation voluntarily by way of a Change. Please let me know your views on this.*

The Councils thank the Inspector for the opportunity to comment on this issue in advance of the publication of his report. The Councils' comments are set out below.

**1.0 The need for a Household Recycling Centre (HRC) and consistency with the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy and other waste management plans and strategies**

1.1 The Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Policy CS16), adopted by the Councils on 19 July 2011, seeks to secure a network of HRCs and identifies the following broad locations for new HRCs in the Cambridge Area:

- Cambridge East
- Cambridge North
- Cambridge South

The HRC broad locations identified in Policy CS16 (including those in Cambridge) represent the principal growth areas (and consequently areas that will experience an increase in demand for local services), and reflect the waste strategy of the authority to further increase local waste recycling and relate the need to provide easily accessible and convenient facilities which provide an ideal drive time to an HRC of a maximum 15 minutes.

1.2 In considering the soundness of the Core Strategy, and specifically the strategy for the provision of HRCs, the Inspector's Report stated:

*'it is right that the CS [Core Strategy] should identify the need in the interests of sustainability and the active involvement of the public in waste management. A single centre to serve the whole of Cambridge would not be appropriate: it would be too remote from a proportion of the population, inhibiting use and requiring longer journeys'*

(Evidence Reference: E136, Paragraph 82)

- 1.3 At the Site Specific Proposals Examination it was confirmed that the timing of the development of the urban extension at Cambridge East was uncertain given the difficulty in finding a suitable site for the relocation of Cambridge Airport. The allocation for a new HRC at Cambridge East is dependant upon this taking place, and if it proceeds it is likely to be a development for the longer term.
- 1.4 If an allocation is not made for an HRC to serve Cambridge South the existing and new residents of Cambridge South would have the option of using the single HRC within the Cambridge area i.e. Butt Lane, Milton (or in the longer term its replacement in the Cambridge Northern Fringe East); or driving some distance to the HRC at Thriplow (approximately 10 miles / 20 minutes). Both are contrary to the intent of the Core Strategy, and specifically Policy CS16.
- 1.5 Reference to consistency with relevant plans and strategies (Paragraph 4.45 of PPS12) is referred to in Inspectors Note 2 (Evidence Reference: R27). It has not been disputed that all realistic potential locations for an HRC to serve Cambridge south lie in the Cambridge Green Belt. Any facility in this location would therefore be inconsistent with local planning policy and objectives, either those of the Cambridge Local Plan or the South Cambridgeshire Local Development Framework; both local planning authorities have objected to the potential sites for an HRC which lie within their authority area. However, not to include an allocation for a HRC to serve Cambridge South in the Site Specific Proposals Plan would be inconsistent with the adopted Minerals and Waste Core Strategy, the Cambridgeshire and Peterborough Joint Municipal Waste Strategy and the Councils adopted Household Waste Recycling Centre Strategy (Evidence References: E135; E077; E056).

## **2.0 Consistency with national policy**

### Green Belt and the Historic Environment

- 2.1 The points raised in Inspectors Note 2 regarding the lack of consistency with national planning policy relate to the Green Belt and the historic environment.
- 2.2 The Councils dispute the suggestion that the assessment of sites was not robust in respect to the historic environment and Green Belt objectives, including the potential effect of waste management development on the setting of Cambridge City. This was taken into account in the work undertaken by LDA Design which assessed each site to determine its landscape capacity to accommodate waste management development as well as potential visual impact. Their methodology clearly states:

#### *'Cambridge Green Belt Study*

*Some sites lie within the setting of the historic city of Cambridge. In 2002 LDA Design (formerly Landscape Design Associates) carried out a study of Cambridge and its Green Belt for South Cambridgeshire District Council (Landscape Design Associates 2002). The report was a core document at the Structure Plan Examination in Public (EiP) which took place at the end of 2002. The study started with an assessment of Cambridge in order to identify the setting and special character of the city and the qualities to be safeguarded, before setting out a vision of the city. In determining the extent to which sites that lie within the setting of Cambridge could accommodate the proposed mineral/waste development, without*

*significant detriment to their character or that of their larger character areas, taking into account current practice of mitigation and reinstatement, it is important to consider the potential effects on the setting and special character of the city to ensure that the qualities to be safeguarded are not harmed. This study therefore makes reference to LDA Design's Cambridge Green Belt report as part of the assessment of the suitability of the proposed uses within the sites.'*

(Evidence Reference: E028, Paragraph 2.1)

- 2.3 All site assessments include a summary of the conclusions of the LDA landscape assessment. The summary of 'Landscape Capacity and visual impact with mitigation' in the site assessment of W1X therefore takes historic issues into account and states:

*'The site consists of arable farmland and grassland, and lies within an open farmland setting to the south of Trumpington. Although the development would be a new feature in the open arable landscape and change the approach into Cambridge it would provide an opportunity to enhance the urban edge by positive architecture and landscape design. Screen planting might be appropriate and could create a soft green edge to Cambridge. To maintain the compact form of the city and rural foreground to views from the M11/ A1309 junction development should be located to the north east of the site and countryside retained to the south west'*

(Evidence Reference: E093, Site W1X)

- 2.4 The Councils have acknowledged that the location of W1X is a sensitive one, but consider that it is possible to provide this essential infrastructure whilst still respecting the principles of Green Belt and the historic environment, as advised by LDA design. Considerable work has been undertaken to demonstrate how an HRC might be integrated in this location (Evidence Reference: E094). The Councils have already confirmed that additional land to the east of site W1X would also be available for landscaping / mitigation (Evidence Reference: SSPGen2, Change No. S70/1)
- 2.5 The Council as Highway Authority also owns land within the highway boundary of the A1309 north of the M11 junction where further planting could be undertaken. This could complement existing new landscaping areas associated with the Addenbrookes Access Road. Taken together with existing new landscaping undertaken along the western boundary of site W1X the Councils believe that adequate mitigation to minimise its visual impact in the local area can be achieved.

#### PPS1 Delivering Sustainable Development and PPS10 Planning for Sustainable Waste Management

- 2.6 The Councils consider that consistency with national planning policy is a broader issue than reflected in Inspectors Note 2, and should also take into account national planning guidance in respect to delivering sustainable development and sustainable waste management.
- 2.7 Over 4,000 home are planned for the Cambridge Southern Fringe; it is a very major extension to the City. PPS1 Delivering Sustainable Development advises planning authorities that when bringing forward locations to meet the expected needs of housing and other types of development they should be,



*'taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management...'*

(Evidence Reference: R21, Paragraph 27(iv)).

2.8 The principles of sustainable waste management are enshrined in the European Waste Framework Directive. Article 16 stresses the need for a network of facilities, the need for self sufficiency, and the importance of proximity in the provision of waste management facilities.

2.9 PPS10 states that planning strategies should:

*'protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission'*

(Evidence Reference: R26, Paragraph 3, bullet 6)

Although this is stated by reference to determining planning applications its thrust logically applies equally to making provision through development plan allocations.

2.10 In January 2006 the Cambridge Southern Fringe Area Development Framework was approved by Cambridge City Council. It identified a need for a Household Waste Recycling Centre in the Southern Fringe (Evidence Reference: E102, Section 4.3, page 42). However, the consequential detailed planning of the area did not leave any potential sites for an HRC within the development area of the southern fringe. All realistic potential sites for an HRC therefore lie outside the development area and within the Cambridge Green Belt.

2.11 Contrary to the national situation the development of the Cambridge southern fringe has not slowed down. Recent reserved matter planning decisions made by the Joint Development Control Committee include:

- Glebe Farm – 286 dwellings, granted August 2010
- Bell School site – 347 dwellings, outline planning permission December 2010
- Trumpington Meadows – 353 dwellings, granted 13 July 2011
- Clay Farm – 306 dwellings, granted 13 July 2011
- Trumpington Meadows Primary School – granted full planning permission 13 July 2011

Construction at Glebe Farm has already commenced, and the first dwellings in the Clay Farm area are expected to be completed in early 2012.

2.12 Whilst the residents in Cambridge South can rely on existing HRC provision in the short term, in the medium / longer term as the new housing comes on stream, the need for an HRC will become pressing. It should also be borne in mind that

considerable development is also taking place in other parts of the City and its immediate hinterland (such as redevelopment for housing of the Bayer East, Hauxton site), which will also place increased demands upon the existing local HRC infrastructure.

### **3.0 Compatibility of waste management development with residential development**

- 3.1 Inspector Note 2 raises, by reference to Waste Consultation Areas, the issue of compatibility of waste management development with residential development. On 19 July the Councils adopted their Supplementary Planning Document, The Location and Design of Waste Management Facilities (Evidence Reference: E157). This provides advice on the provision of waste management facilities on urban edge / new development site locations. It illustrates that through high quality design and appropriate use of buffers and mitigation measures (which can take a number of potential forms) waste management development can be proximate to residential development, the source of the waste arising. The principles of this Guide were taken into account in the concepts put forward for site W1X (Evidence Reference: E094).
- 3.2 Waste Consultation Areas normally extend 250 metres from a waste management site. It is possible that after a site has been developed its Waste Consultation Area could be reviewed with a view to reducing it, having taken into account the detailed design of the facility and the mitigation measures which have been put in place.
- 3.3 A case in point is the new Witchford HRC. This new development has an access point which is 50m from a residential property, which is also approximately 100m from the facility building itself. The facility is also adjacent noise sensitive uses on the neighbouring industrial estate. However, with mitigation the HRC has been successfully accommodated.
- 3.4 Site W1X faces the proposed development at Glebe Farm. However, it should be noted that the developer, Countryside Properties, did not make any representations at the Proposed Submission stage against the proposals in the Plan in this respect.

### **4.0 The timing of HRC provision**

- 4.1 The Councils have indicated that in the short term existing and new residents of Cambridge South can be served by the existing provision in the area, albeit that this is far from ideal (see Section 1). However, that is not to say that advance planning for a new HRC should be postponed.
- 4.2 Inspectors Note 2 suggests that the Councils could promote a site for an HRC for Cambridge South through a future partial review of the Site Specific Proposals Plan. This approach is not favoured by the Councils. Experience to date has shown that the preparation of a Development Plan Document (DPD) is time and resource hungry. There are several statutory stages to a DPD review, and this is unlikely to be a quick process particularly given that this issue has proven to be both complex and locally contentious. Moreover the Councils have already undertaken an exhaustive search for potential sites over a 5 year period (including a study of brownfield and industrial land, Evidence Reference: E038), and there is no evidence to suggest that new sites would be identified through a review process, or

that the issues would be any different from those today. In addition recent experience with the development of a new HRC at Witchford, Ely has shown that the period from the commencement of design work to commissioning of an HRC can take around three and a half years. These factors combine to suggest that if this matter was postponed an HRC would not be delivered until very much later in the Plan period. Planning for a new HRC needs to take place now so it can be delivered in the medium term.

## **5.0 Deliverability of an HRC**

- 5.1 Inspector Note 2 suggests that site W1X may not be deliverable given the objections by Cambridge City Council (Green Belt matters) and English Heritage (the historic environment). These points have already been considered in this response.
- 5.2 The Note goes on to state that the Inspector anticipates an increased level of objection from occupiers of the new housing developments. It is of course not the volume of objections but the validity of their land use planning concerns which needs to be taken into account. It is the Councils experience, demonstrated through the volume of representations recorded on the site assessments of W1X and other potential sites considered for an HRC (E093, e.g. Site SS4-125 Hauxton), that any proposal for this type of development will receive substantial local comment.
- 5.3 In a similar case at the new Witchford HRC significant local comment was also received but when balanced against the pressing need for the facility and improved accessibility the Planning Committee resolved to grant planning permission.
- 5.4 The path of any planning application would be assisted by an allocation in a Development Plan Document. For reasons outlined in this response the Council consider that W1X should be allocated.
- 5.5 Developers in the Cambridge Southern Fringe are contributing financially through Section 106 contributions towards the provision of new local HRC facilities.

## **6.0 Allocation of W1X**

- 6.1 As outlined above the Councils have undertaken an extensive search for sites which could accommodate an HRC to serve Cambridge South. There has been a robust scrutiny of those potential sites through the Councils 3 stage site assessment methodology (Evidence Reference: E093). This process has resulted in site W1X being identified as the most appropriate site for this use, this process was summarised in the Councils response to Matter 5 (Evidence Reference: SSP/5/CP/2).
- 6.2 The Councils consider that W1X has several advantages over the other sites that were considered including:
- it is in a sustainable location and the one which is the most proximate to the main source of waste arising

- a location adjacent to new development provides an opportunity to facilitate the integration of the facility into the urban fringe, which in the Councils view can be more readily and successfully achieved than integration of an isolated development into the open countryside / Green Belt
- there are opportunities to integrate the high quality design of the new HRC with the new development taking place north of the Addenbrookes Access Road
- the site is owned by the County Council which will aid delivery
- there is scope to use additional land to the east of the site and land under the control of the Council as Highway Authority for further landscaping, which will assist integration of the site into the local area
- the location of the development proximate to housing giving easy access to the facility
- the location of the development close to Trumpington Park and Ride and employment (e.g. Addenbrookes complex) will help encourage linked trips and increased recycling

6.3 The Councils recognise that there are sensitivities associated with site W1X, specifically its green belt location and issues relating to the historic environment of Cambridge. However, these concerns have to be balanced against the other matters which have been outlined in this response. On balance the Councils maintain their view that site W1X is an appropriate location for an HRC to serve Cambridge south and should be allocated in the Site Specific Proposals plan.

## 7.0 **Conclusion**

7.1 Having had regard to Inspectors Note 2 and the response above the Councils conclude:

- the site assessment process has been robust, and has included appropriate consideration of the Cambridge Green Belt and its purposes, including the historic environment and the setting of Cambridge City
- there has been an exhaustive search for a suitable site; no others have been suggested that have not been considered through the Plan process. The Council has therefore considered all 'reasonable alternatives' as required by PPS12
- W1X has been identified as the most appropriate site having considered all reasonable alternatives and all relevant factors including Green Belt and the historic environment, and considerable work has been undertaken which demonstrates how an HRC can be successfully integrated into this location
- failure to make an allocation for an HRC to serve Cambridge South would be contrary to the Councils adopted Minerals and Waste Core Strategy, as well as other adopted waste management plans and strategies, which is contrary to PPS12

- the allocation of W1X needs to be considered in the context of other national planning policy; the key principle of delivering sustainable development and the essential provision of sustainable waste management infrastructure. Having had regard to all national planning policy the Councils consider that the balance must lie in favour of meeting this fundamental guidance and that W1X should be allocated
- development in the Cambridge Southern Fringe has commenced and has not slowed down, as the population in this area and in the wider City area increases the reliance of Cambridge south on existing HRC provision can only be in the short term
- in order to deliver alternative HRC provision in the medium term planning decisions need to be taken now, it would not be appropriate to defer provision to a future review of the DPD
- any planning application for an HRC to serve Cambridge South will face green belt policy issues and will attract considerable local comment, but this will need to be balanced against the need for the facility being an essential element in securing sustainable development in the local area.

7.2 The Inspector has invited the Councils to consider withdrawing allocation W1X. The Councils do not wish to follow this course of action. They maintain that having had regard to all factors W1X should be allocated in the Site Specific Proposals Plan.

7.3 In the event that the Inspector is still minded to remove site W1X from the Site Specific Proposals Plan the Councils request that he have regard to advice in the Companion Guide to PPS10 which states:

*'In their search for sites, and in line with the Key Planning Objectives in PPS10, WPA are expected to protect Green Belts but recognise the particular locational needs of some types of waste management facilities when defining detailed Green Belt boundaries. In certain circumstances, in particular where a local authority's area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt.'*

*Such a proposal should be brought forward through the LDD process. This will provide greater certainty for the WPA in providing sufficient land capacity to meet identified need for waste management facilities and to the waste industry for the purpose of submitting a planning application. Where land is removed from the Green Belt in this way, it should be specifically allocated in a DPD as a waste management facility site only. This process will need to be carefully coordinated between the District planning authority and the WPA in two tier authority areas, given that the Green Belt boundary will be defined in the district DPD.'*

(Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10, Evidence Reference: CSRepD1, Paragraphs 7.34 and 7.35)

It is respectfully suggested that the Inspector's Report could assist any future search for a suitable site by requesting that the current reviews of the Cambridge

Local Plan and South Cambridgeshire Local Development Framework must consider removing land from the Green Belt for this specific waste management purpose. This land could then be taken forward for allocation through a closely targeted partial review of the Site Specific Proposals Plan.

- 7.4 Should the Inspector remove W1X from the Plan in order to ensure soundness of the Site Specific Proposals Plan, the Councils confirm that they would still wish to proceed to adopt the DPD.
- 7.5 Finally, the Councils thank the Inspector for the offer of a further Hearing Session on this matter. The Councils share the Inspector's doubts that this would be productive, and are content for him to take his decision having had regard to this additional response and the detailed evidence already submitted on this matter and findings from the site visit.