

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO:	Northstowe and New Communities Portfolio Holder meeting	20 September 2011
AUTHOR/S:	Executive Director (Operational Services) / Corporate Manager (Planning and New Communities)	

RESPONSE TO CONSULTATION BY CAMBRIDGESHIRE COUNTY COUNCIL AND PETERBOROUGH CITY COUNCIL ON THE DRAFT RECAP WASTE MANAGEMENT DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

Purpose

1. The purpose of this report is to agree the Council's response to a consultation currently being carried out by the Cambridgeshire County and Peterborough City Councils. The consultation is on the Recycling in Cambridgeshire and Peterborough Partnership's (RECAP) Waste Management Design Guide Supplementary Planning Document (SPD).
2. The consultation is for six weeks from 5 September 2011 to 17 October 2011.
3. The full consultation can be seen on the County's website.
<http://www.cambridgeshire.gov.uk/environment/planning/mineralswasteframework/recapwastemanagementdesignguidespd.htm>
4. This is a key decision because it is likely to have an impact on all new developments throughout the district.
5. It was first published in the April 2011 Forward Plan.

Recommendations

6. The Portfolio Holder for Northstowe and New Communities is recommended to agree the responses to the consultation on the SPD as contained within the report and in the more detailed schedule in Appendix 3.

Reasons for Recommendations

7. Need to respond to the consultation being carried out by Cambridgeshire County and Peterborough City Councils.

Executive Summary

8. Cambridgeshire County and Peterborough City Councils are consulting on a revised draft of RECAP Waste Management Design Guide SPD. South Cambs responded to an earlier draft in 2010. This report outlines the Council's response to the latest draft SPD. South Cambs' main concerns are that the draft SPD could be improved to be more user friendly for planners and developers; need for clarity for developers in knowing the levels of contributions expected from them for waste management infrastructure particularly with household recycling centres and need for additional guidance for design considerations.

Background

9. This SPD will provide guidance in relation to the design of waste management facilities as part of residential and commercial developments and the requirements for expanded and/or additional household waste management infrastructure.
10. The purpose of the SPD is to set out a series of development principles and design practice and it is intended to be used by:
 - Developers and designers to ensure effective segregation, storage and collection of waste materials; and
 - Planning Authorities in assessing planning applications to ensure that waste management needs for both residential and commercial developments are adequately addressed and secured.
11. The guidance contained within the SPD relates to policies contained within the adopted Minerals and Waste Core Strategy (MWCS). The particular policies are CS16 covering the provision of Household Recycling Centres and C28 covering Waste Minimisation, Re-use, and Resource Recovery.
12. The Design Guide was originally prepared by consultants Wiser Environment (an Environmental Consultancy) on behalf of RECAP and was subsequently published in 2008. South Cambridgeshire District Council adopted this earlier version as Council Policy in March 2008 pending its adoption as a SPD. The 2008 draft guidance was reviewed and included in the Pre- Submission consultation on the Minerals and Waste Development Plan carried out by Cambridgeshire County and Peterborough City Councils in February / March 2010.
13. South Cambridgeshire District Council responded to the Pre Submission consultation and at the Planning and New Communities Portfolio Holder meeting on 2 March 2010 agreed the comments to be submitted on the draft SPD (See Appendix 1 for the report). The Council had a number of areas of concern regarding this earlier draft particularly about the pre-mature timing of the consultation on the draft SPD; concerns about the ease with which the SPD could be used by both planning officers and by developers when considering waste matters in planning applications and also that there was insufficient information in the SPD to explain how financial contributions towards the provision of Household Recycling Centres would be sought from developers.
14. As a result of the representations submitted to Cambridgeshire County and Peterborough City Councils a Position Statement on the consultation was published in June 2010, which formed part of the evidence base for the examination on the MWCS carried out in December 2010 (See Appendix 2). This statement highlighted the issues raised by objectors and the Councils recognised that additional information should be included in a revised draft of the SPD and therefore there was a commitment from the Councils to carry out further consultation –this current consultation. The Inspector in his report on the examination into the Core Strategy published in March 2011 acknowledged that further revisions were to be made to the SPD but that it was not for him to comment on the content of an SPD.
15. Cambridgeshire County and Peterborough City Councils have prepared a Statement of Consultation that sets out all the representations received during the consultation in 2010 and also outlines the Councils' responses to them and proposed changes to the draft SPD – <http://www.cambridgeshire.gov.uk/NR/rdonlyres/6F86D33A->

[9E0B-4A6E-B0F9-67B7EBC58F69/0/1104117appendix.doc](#). The County Council's Development Control Committee agreed this document on 11 April 2011. In the draft SPD that has now been published for consultation there are some additional amendments that have been made to the SPD.

Issues for consideration by South Cambridgeshire District Council

16. All the representations submitted by South Cambridgeshire District Council have been included in a schedule in Appendix 3. This outlines each representation; the response by Cambridgeshire County and Peterborough City Councils and amendments made to the draft SPD as agreed in April 2010 and South Cambs response to these changes with proposed changes.
17. It should be recognised that many of the concerns that were made by this Council have been addressed in the revised draft SPD and this is to be welcomed.
18. The main issues of concern for South Cambs are as follows¹ -
19. **SPD user friendly for both developers and planning officers?** (MWRECAP004; 044; 045)
South Cambs when it submitted representations in 2010 wanted to ensure that the SPD be as user friendly as possible and especially the toolkit which is intended to be used by developers when they are submitting planning applications to assist them in including waste issues within their developments. South Cambs suggested that the format of the SPD be looked at again so that the toolkit would be a clearly identifiable part.
20. In the latest revised SPD the toolkit is still contained within the document and could not be pulled out as a separate entity. It does not have anything to differentiate it from the rest of the SPD – different font or format at the top or edge of the page to make it stand out, which is disappointing. Mention had been made in the Statement of Consultation agreed in April 2011 that the toolkit was to be presented as a pullout sheet, which will sit at the front of the guide and cross refer to the relevant parts of the SPD. It is not apparent that has been included in the consultation draft of the SPD since the toolkit is Section 10 of the draft SPD and therefore incorporated into the main body of the document rather than able to be separate it out in a front pocket. No mention has been made of the electronic version or other changes to SPD suggested by South Cambs, which is disappointing.
21. Whilst recognising that the Design Guide contains much useful information it would be improved if the toolkit were able to be a stand-alone document and especially if the electronically available version be separate so that it could be more easily downloaded and completed by a developer. The advice from planning officers that have used the document is that it is too long and complex to make it easy for them and developers to use and would welcome the creation of a summary version of the final adopted SPD to be able to highlight the main issues about waste that a developer would need to know before submitting a planning application.
22. The experience of planning officers in South Cambs is that developers do not use the toolkit regularly when submitting applications. Some training sessions have been carried out with planning officers on how to use the guide and more would be

¹ The reference in brackets is that of the representation number recorded by Cambridgeshire County and Peterborough City Councils. (MWRECAP00xx) This reference is used in Appendix 3 of this report.

welcomed once the SPD has been adopted to ensure that the officers know what information is required within the toolkit and that they can advise applicants accordingly.

23. **Clarity for the developer in knowing the level contributions may be expected from them** (MWRECAP007)

The earlier draft SPD did not highlight clearly to developers that there would be financial implications relating to the provision of waste management infrastructure.

24. The revised SPD has provided some clarification of the financial implications. It states now that the financial implications 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. This is to be welcomed.

25. In the revised SPD in paragraph 8.15 it states that developer contributions established in principle will be subject to *suitable indexation and inflation* applied as appropriate. This should be clarified as to which indexation is to be used because the current wording adds further uncertainty for developers in what may be expected from them.

26. **Household Recycling Centres- the financial implications for developers** (MWRECAP 036, 037, 040, 041 and 042)

The Council was concerned that within the earlier draft there was a lack of information to justify the request for contributions to household recycling centres. This has been addressed in the revised SPD and additional information has been provided. In Cambridgeshire County and Peterborough City Councils' Statement of Consultation it is stated as follows –

'To ensure that developer contributions for additional Cambridgeshire Household Recycling Centres and/or improvements that will be sought are directly related to proposed developments further revisions to the RECAP Waste Management Design Guide are required.'

Further work has been undertaken by the County Council's Waste Management Service to determine the scale and nature of the developer contributions, which will be sought for the upgrading of existing Recycling Centres (Alconbury, Wisbech, Whittlesey and Thriplow) and additional capacity/ Recycling Centres (March, St Neots, Witchford and Cambridge area.)

Based upon current assumptions relating to the level of expected housing growth it is not considered that developer contributions will be required for the other Recycling Centres within the County.'

27. As a result Part 8 of the draft SPD relating to Household Recycling Centres has been revised to include details on what size of site a new HRC may require and other details of its design requirements. Part of this additional wording is as follows -

'...New sites in Cambridgeshire will typically be on 1.2 hectares of land, allowing enough flexibility to manage traffic flows of the site, by accommodating split-level easy access for unimpeded traffic movement through the site. This site size will also allow for effective landscaping, as well as the ability, where appropriate, to provide further environmental mitigation in more populated areas by putting the operations under a roofed area, or in a building. Upgrades to existing sites on the other hand will increase the site capacity by:

- *Extending the site size to improve both skip capacity and traffic circulation*
 - *Where possible make the site split level*
 - *Improving the existing provision and contract arrangements...*
28. The revised SPD also provides information about the network of HRCs that will serve Cambridgeshire and a map to show the catchment areas for each of these sites in order to show clearly which HRC a developer may have to contribute to. The catchment areas are grouped by political ward and allocate the existing and projected population to each site. There is also a chart to show the methodology for determining the financial contributions that developers may have to make. (See Appendix 4 for details).
29. Whilst South Cambs recognises that more information has been included into the revised SPD there are still major concerns about whether these amendments will achieve the aim of providing clarity for developers. The methodology is good but it does not go far enough.
30. It is likely that the need for this guidance in the SPD will be limited since when each local planning authority has an agreed schedule of charges for the Community Infrastructure Levy (CIL) the level of contributions for HRCs required will be included with the other requests Cambridgeshire County Council (CCC) will have for infrastructure. However in the intervening period clarity is required if CCC is expecting any contributions from developers towards HRCs.
31. The particular concerns that South Cambs still have are as follows
32. Capital sums required for each HRC
What is the capital sum each HRC requires to fund the necessary relocation / improvement works to the HRC network? (i.e. how does CCC plan to calculate the necessary contributions for each development given that each ward within South Cambs has different needs). This information will be required to understand the total cost of the HRC network in order to incorporate this into the future CIL charging schedule. Although a new table has been included in the revised SPD – Table 8.1 (page 35-37) – it does not include the cost for each HRC, which would be needed for a developer to calculate a contribution using Table 8.2. (It is recognised by South Cambs that it will only be capital not revenue contributions that the CCC would ask for). This information could be included in paragraph 8.10 of the draft SPD that lists the network of HRCs to serve Cambridgeshire. This list would be clearer if the sites were in alphabetical order and detail given on what is required at each site. Since St Neots HRC has already been provided any planning obligations would need to be applied retrospectively – this should be made clear in the SPD.
33. In paragraph 8.15 of the draft SPD it states that an independent assessment of site costs has been carried out. Reference should be made in the SPD as to who carried out this work and when in order for developers to know how to access the site costs information.
34. Catchment Areas
The revised SPD provides a map showing the catchment areas and a schedule of which parishes would contribute to which HRC. (See page 35 of revised SPD). For clarity it would be better if the map showed a different colour for each area because at present it implies that the areas with similar colours are related in some way – same levels of contributions expected or population sizes?

35. The map indicates the location of existing HRCs and currently appears to show Milton HRC. It is suggested that the location points are removed since this highlights the non-central position of some HRCs within their catchments, which could result in challenges to the proposed boundaries of these areas.
36. The new HRCs planned for the Cambridge area and for Northstowe are all included in one group. Northstowe is included, as a District electoral ward, which it is not at present, so should be removed from Table 8.1.
37. Thresholds and different ward requirements
The draft SPD is not clear on the threshold size of development for which the County Council would expect financial contributions towards HRCs. Would a developer with a planning permission for a single dwelling be expected to contribute or would five or ten dwellings be considered a more reasonable threshold?
38. It could be that the levels of contribution required from different wards could vary greatly within South Cambs depending on whether a ward was in a group where a new HRC was planned for or an upgrade of an existing facility. If the capital cost of an upgrade was only a small amount per dwelling it could cost more to administer and collect this contribution as part of a Section 106 than the capital cost asked for. CCC does ask for other infrastructure requirements as part of Section 106 agreements, which have varying thresholds for when they are taken up. Would it therefore be simpler if the threshold for contributions to HRCs kicked in at the same thresholds as these other requirements rather than requiring all development to make a financial contribution?
39. **Consideration of design issues** (MWRECAP 029;030;031;032;033; 046)
South Cambs made a number of representations on the earlier draft SPD since it was felt that the emphasis in the section on Waste Storage Infrastructure was on the functional requirements rather than the design considerations. The Council therefore welcomes the inclusion of an additional general principle to consider the appearance of waste storage compounds – ‘Urban design principles including the local character, place making and local distinctiveness of an area.’
40. The urban designers working at South Cambs have experience of a number of major projects and fringe sites around Cambridge and within the District and have stressed the importance of incorporating better design for waste facilities into new developments and where possible into existing communities. The impact of bins and bin storage facilities along the Streets and within Public Realms cannot be overlooked. Usually, bins and bin storage areas form a part of the ‘Public Realm’ by being within an existing or proposed streetscene, hence the visual impact of the bin store is key to the quality of any new or existing Streetscape. South Cambs request that appropriate level of design emphasis is included in the SPD on Urban Design principle of ‘well integrated street design’ in relation to bins storage facilities.
41. A new paragraph should be added in Part 5 Waste Storage Points after 5.1 to read as follows -

‘The design of proposed developments should consider the siting and layout of refuse and recycling storage at an early stage. It is important to emphasise that appropriate siting and landscaping should reduce the visual impact of the bin store, to help enhance the overall quality and experience of the streets/development.’
42. Paragraph 6.2 in Part 6 Waste Storage Infrastructure should be amended to read as follows -

'The proposed designs of the bin storage area will need to be considered as part of the development proposals and the proposed design should be justified within the design and access statement submitted as part of the planning application. Where waste storage compounds are to be utilised the developer should make adequate arrangements for their management and maintenance to the satisfaction of the Local Planning Authority. '

43. In Part 7 Waste Collection a new sub-heading should be added after paragraph 7.2 to read as follows-

'Key Aspects of Urban Design

1. Bins, bin storage areas and communal recycling centres form a part of the public realm within an existing or proposed streetscene, therefore integrated and innovative design and siting of bin stores and storage areas should be explored to aid well designed and good quality Public Realms.

2. In order to reduce the visual impact of the store, an appropriately screened or landscaped area should be considered. The proposed design for bin stores and storage areas should be considered within the design proposals for the streetscenes and development as a whole (including communal recycling centres)

3. The design, layout and siting of bin stores or storage areas will be expected to reduce opportunities for crime and anti-social behaviour.'

44. These additions to the SPD will provide an improved balance between the functional requirements of storing and collecting waste and the design aspirations of planners to improve the future visual appearance of all new developments. Achieving both requirements is vital to creating future communities that have a quality environment.
45. South Cambs welcomes the inclusion of case studies within the draft SPD in part 12. The opportunity could be taken to promote better design by having further examples of good practice be included in this section especially to show different ways that new residential developments have been designed to include space for waste bin areas within them. The appearance of a new housing scheme can look cluttered if the residents find it easier to leave their bins in front of their houses rather than them having easy access to a well designed waste bin area. Equally the visual quality of commercial development can be improved if waste disposal areas are carefully designed within a new scheme and case studies of good examples could help planners show how waste can be dealt with.

Implications

46.	Financial	Nil
	Legal	Nil
	Staffing	By responding to the consultation on the SPD the Council will more efficiently use staff time since the SPD will provide guidance on waste issues relating to planning applications.
	Risk Management	Nil
	Equality and Diversity	Nil
	Equality Impact Assessment	No but one will have been prepared by Cambridgeshire County and Peterborough City Councils for the draft SPD.

completed	
Climate Change	Developers in using the SPD will have to consider how to make it easier for residents and businesses in new proposed developments to dispose of waste. Aim of SPD is to promote waste reduction by increasing recycling which will be good for future environment in South Cambridgeshire .

Consultations

47. Consultations have taken place with all those officers that were involved in making comments on the earlier draft SPD. – Planning; New Communities; Environmental Health; and the Urban Design Team.

Consultation with Children and Young People

48. Not specifically applicable to this consultation.

Effect on Strategic Aims

49. AIM A – We are committed to being a listening Council, providing first class services accessible to all
The Council is responding on behalf of the residents of the district to the consultation. Where the contents of the SPD may impact upon development and therefore affect local communities within South Cambs the Council has indicated where changes should be made to the SPD.
50. AIM B – We are committed to ensuring that South Cambridgeshire continues to be a safe and healthy place for you and your family
By responding to the consultation the Council will ensure that the contents of the SPD maintain South Cambs as being a safe and healthy place for all and that its proposals in future will produce developments that are well designed and consider waste management and promote recycling.
51. AIM C – We are committed to making South Cambridgeshire a place in which residents can feel proud to live
By responding to the consultation the Council will ensure that the contents of the SPD is able to assist in the planning of the district as regards waste.
52. AIM D – We are committed to assisting provision of local jobs for you and your family
The SPD promotes recycling within new developments and the use of well designed waste facilities within the district. Managing waste facilities could provide for local jobs.
53. AIM E – We are committed to providing a voice for rural life
The Council in responding to the consultation will ensure that the SPD considers rural areas and the special needs of such areas as most of the district is rural in character.

Conclusions / Summary

54. The report outlines the Council's main concerns on the latest draft SPD. South Cambs welcomes that many of the issues raised in the previous consultation on the earlier draft of the SPD have been accepted by the Cambridgeshire County and Peterborough City Councils. However there remain some concerns that need to be addressed and further revisions to be made to the final SPD as set out in this report.

Appendices

Appendix 1 - Report to Joint Planning and New Communities Portfolio Holder meeting on Response to consultation by Cambridgeshire County Council and Peterborough City Council on the two draft supplementary planning documents relating to waste management (2 March 2010)

Appendix 2 – Position Statement on the RECAP Waste Management Design Guide SPD by Cambridgeshire County and Peterborough City Councils (June 2010)

Appendix 3 – Outline of amendments proposed by Cambridgeshire County and Peterborough City Councils' to representations submitted in March 2010 by South Cambs on the draft RECAP Waste Management Design Guide – (September 2011).

Appendix 4 – Extract from revised draft SPD on Household Recycling Centres – What are the catchment areas for HRCs and how to calculate developers contributions (Edited to show those for South Cambs)

Background Papers: the following background papers were used in the preparation of this report:

- Pre- Submission draft of RECAP Waste Management Design Guide SPD (2010)
- Cambridgeshire County and Peterborough City Councils' Minerals and Waste Core Strategy
- RECAP Waste Management Design Guide Draft SPD – Statement of Consultation (Representations and Responses) April 2011.

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