

FD.EVR - Part 1

Cambridgeshire and Peterborough Minerals and Waste Local Plan

Part 1: Policy Framework and Context

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1. Introduction and National Policy Context

Introduction

- 1.1. Cambridgeshire County Council and Peterborough City Council are reviewing their joint adopted Minerals and Waste Development Plan and supporting documents. These comprise the following documents (with adoption date):
 - Core Strategy Development Plan Document (DPD) (July 2011)
 - Site Allocations DPD (February 2012)
 - Block Fen and Langwood SPD (July 2011)
 - Location and Design of Waste Management Facilities SPD (July 2011)
 - RECAP Waste Management Design Guide SPD (February 2012)
- 1.2. The above Local Development Documents are to be replaced by a single Minerals and Waste Local Plan (MWLP) covering the period to 2036. The new Local Plan will set the overall spatial framework and development management policies for sustainable mineral and waste management development across the plan area.
- 1.3. This Evidence Report provides a narrative on the development of and justification for Policy x: Title in the emerging new Local Plan.

National policy

- 1.4. The National Planning Policy Framework (NPPF 2019) and National Planning Practice Guidance (NPPG) provide the basis of national planning policy. Of specific relevance to Part 1 are the following areas of the NPPF:
 - Paragraph 7 - *“The purpose of the planning system is to contribute to the achievement of sustainable development...”*
 - Paragraph 8 - *“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
 - a) **an economic objective** - *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) **a social objective** - *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - c) **an environmental objective** - *to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve*

biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

1.5. A number of paragraphs from the NPPG are also relevant, as follows:

“Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process.” (Paragraph: 016 Reference ID: 12-016-20140306)

“The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.” (Paragraph: 026 Reference ID: 61-026-20180913)

2. Local Context in Relation to Part 1: Policy Framework and Context

- 2.1. The inclusion of Part 1 within the plan is not locally specific in itself, however, the vision, aims and objectives set out within the plan are specific to the plan and plan area. They relate directly to the Sustainability Appraisal (SA), with the objectives of both documents being the same to ensure that sustainability matters are fully taken into account within the plan.
- 2.2. Considerable local evidence is set out in the various documents available on the website, such as SA Scoping Report, HRA report, and various needs assessment reports.

3. Minerals & Waste Local Plan Policy

- 3.1. The Preliminary Draft Plan was published on 16 May 2018 and consulted on over a six week period to 26 June 2018.
- 3.2. Within the Preliminary Draft, Part 1: Policy Framework and Context set out the vision, aims and objectives for the plan. The objectives set out are the same as in the Sustainability Appraisal, to ensure that national and European policy is met and local needs addressed.
- 3.3. During the Preliminary Draft Consultation, there were a large number of representations made on this part of the plan, most of which were in objection to it. In summary, the main issues raised were:

Objective 2

- Part C does not accord with NPPW as there is no requirement for authorities to work towards or achieve net self-sufficiency. The headline objective should be amended to reflect the inevitable need for cross-boundary movement of waste.
- Should relate more closely, or at least have better reference to the policies in the NPPW for identifying suitable sites etc.
- Part D, could be more positive. Amend to read 'support and safeguard existing...'
- Include new 'Part G' indicating that facilities for 'Other Recovery' (as defined in the waste hierarchy) should, when recovering energy, seek to recover both power and heat.

Objective 3

- Part D reword to read 'Require operational practices...'
- Part B could/should go further in terms of providing specific reference to combined heat and power and the sustainability benefits that this can provide.
- Part F - specific reference should be made to the production of energy and recovery of heat from waste management where this is at all possible
- Include a new Part G that supports co-location of facilities with existing waste management operations (the concept of the 'waste management parks' or 'eco-park')
- Within any new criteria include support for the delivery of suitably sized micro-EfW facilities and advanced thermal treatment technologies that can deliver sustainably derived heat, power or cooling to local energy users.
- Include additional criterion promoting back-filling of HGV's as a primary objective wherever practicable to do so

Objective 4

- Should apply the sequential approach to promoting development in areas of lower flood risk as a priority

Objective 7

- Part A, unless an assessment has been carried out to demonstrate that this approach is viable and deliverable, is considered unrealistic and places an unreasonable burden on waste management providers. It should be deleted.
- Include additional criterion promoting back-filling of HGV's as a primary objective wherever practicable to do so

Objective 8

- Unclear how minerals and waste developments could become part of an objective such as Objective 8

Objective 9

- Reword headline objective to read 'Protect and enhance...';
- Part A - re word to read 'Protect and enhance habitats and geodiversity of...'
- Part B amend 'wildlife corridors' to read 'ecological networks' and include definition of ecological network

Objective 11

- Suggestion to include more guidance as to how different afteruses can protect and enhance health and wellbeing, by carrying forward wording from the current adopted plan/SA and including this within the list of actions.

Other general comments

- Suggest additional objective to read ‘The plan will support initiatives of existing waste management facilities that improve operational efficiencies and increase waste throughputs.’
- Please also include a section on probity in which all parties making decisions on applications declare any financial interests or family links to applicants. This information should be made public.
- Objection to the development of a specific site
- Concern that Local Plan is about finding a sustainable supply of minerals as opposed to look at ways to reduce the absolute need to extract more minerals by looking in more radical ways at reducing actual demand for them
- Build a set of sustainable principles into the plan so that document is not just about delivery, but also specific needs of this area
- It is not clear how ‘Resilience and Restoration’ objectives are reflected in the rest of the plan. How/where are the avenues for energy from waste initiatives on matters of energy sources
- General comment seeking improvements to A142 at Mepal through contributions from development in this and ECDC LP
- A number of objectives should have been carried forward from the current Plan/SA

3.4. All representations were carefully considered.

3.5. A number of the comments received in relation to Part 1 were seeking minor wording changes to either the headline objectives or the supporting criteria. Where such changes are being sought they relate to the terminology being used rather than the intent of the objective. The objectives have been established and agreed in consultation with the statutory bodies.

3.6. All other comments were considered, and the text generally updated for this part of the plan. Some of the comments also informed amendments to the main (policy) parts of the plan itself.

4. Alternative Reasonable Options

4.1. In order for the plan to be effective, there are no reasonable alternative options. It is necessary for the plan to have a clear vision, aims and objectives. The objectives set out in the plan are the same as those set out in the sustainability appraisal to ensure that sustainability issues are fully taken into account within the plan, and that the development of the plan and the Sustainability Appraisal is an iterative process.

5. Conclusion

- 5.1. This evidence report demonstrates the rationale for the inclusion of this policy in the Further Draft Plan, and also demonstrates a summary of the issues raised at the earlier Preliminary Draft stage, and how the Councils have considered those issues raised.
- 5.2. Any representations received at the Further Draft consultation stage will be carefully considered, and this Evidence Report will be updated prior to the third and final consultation stage due in late 2019.