Cambridgeshire and Peterborough Minerals and Waste Local Plan: **Developing a Spatial Strategy for Waste Management Provision**

Introduction

1. The purpose of this note is to give additional background information on how the spatial strategy for waste in the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) has developed.

Context to the development of a spatial strategy

National guidance

2. The National Planning Policy for Waste (NPPW) states in paragraph 4 that waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations.

3. Furthermore the Government's policy direction as established in the NPPW regarding identification of suitable sites and areas highlights the need to:

   - consider waste management alongside other spatial planning matters;
   - enable communities and businesses to take more responsibility for their own waste;
   - plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle;
   - recognise the relationship between catchment areas and economic viability;
   - support opportunities for co-location of waste management facilities together and with complementary activities; and
   - give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.

Options to identify locations

4. There are a number of ways in which a local plan can identify locations for waste management development. Several options have been considered:

   i. Allocating specific sites – By far the clearest option for identifying locations for waste management development is to specifically allocate sites in the plan for such use; this could be based on such sites being put forward by the industry and assessed as appropriate or through some other means.
   ii. Identification or designation of specific areas for development - This option works on the basis that certain types of locations, for example general industrial area locations, are appropriate in principle for waste management use, and that such areas should be designated within the plan and shown on the policies map.
   iii. Identification of broad areas of focus - This option is less geographically specific than an allocation or designation, both of which are shown on an

Ordnance Survey map; this could be through broadly identifying on a non-OS based map favoured areas and locations for waste development or to describe such favoured locations in policy or in the explanatory text.

iv. Identification of policy criteria - Which would direct different types of waste management development to suitable locations, in appropriate (and specified) circumstances.

A Waste Spatial Strategy could comprise of a single, or a combination of the options, identified above.

5. An approach of not giving any geographical direction in the plan and simply relying on a generic strategic policy on which applications for waste development would be determined is not considered appropriate. This is because it would effectively move the waste element of the local plan into being no more than guidance on what matters were to be addressed in determining a planning application, rather than giving any plan-wide steer on where proposals should actually be directed to. In addition such an option would not be consistent with national policy.

6. There are pros and cons to the various other approaches referenced in paragraph 4 above, and this is also dependent on whether it is appropriate to pursue a flexible approach to the location of waste management facilities; the particular circumstances of the plan area, including constraints; the opportunities for development; and the extent of the capacity gap identified and the consequential quantum of facilities to be planned for.

7. The potential sustainability effects of these options has been tested against the sustainability objectives through the Sustainability Appraisal (SA) process in order to assess potential contribution towards achieving sustainability outcomes and addressing key issues.

8. In the case of Cambridgeshire and Peterborough, the Waste Needs Assessment which has been prepared to support the preparation of the MWLP has concluded that the capacity gap is relatively small, and in most cases non existent, for the various waste management streams to be managed over the period to 2036.

9. Over the plan period there is no capacity gap for built facilities for the re-use, recycling or recovery of municipal, commercial and industrial waste and soil treatment of construction, demolition and excavation waste (C,D&E). In practice such facilities are often associated with other mineral or waste management facilities, and are only occasionally located within a building. There is a potential need for hazardous waste recycling, however such waste tends to be managed at a regional or national scale.

10. In terms of the need for the deposit of waste to land and disposal, the Waste Needs Assessment has identified a small need for inert recovery capacity, and inert landfill, in the order of 2.0 and 1.9 million tonnes respectively. However, it is anticipated that this deficit can comfortably be accommodated over the plan

period through the creation of new voidspace arising from mineral extraction. There is also a deficit identified for non-hazardous landfill over the plan period of 2.2 million tonnes.

Consideration of development patterns and industry interests

11. The development of a sustainable waste management network requires a range of facilities aligned with the different levels of the waste hierarchy, including facilities for the preparation of wastes for re-use and recycling and other recovery as well as facilities for the disposal of residual wastes (including residues arising from the treatment of waste). Ideally facilities should be directed to locations where investment, and links to existing land uses and infrastructure networks, can be optimised, in order to support sustainable economic growth and development of sustainable communities. This may include the co-location of waste management facilities, or co-location with other compatible uses such as mineral development, industrial development, or specialist uses such as medical or research sites. However, the waste industry may also come forward with proposals that comply more with their business plan or business opportunities, which may place less importance on these considerations.

12. Whatever option is taken forward there would need to be some form of spatial strategy to indicate where waste management development should be focused. Whether that is taken forward through the identification of specific locations, including making specific allocations in the MWLP, depends on how much direction is sought through the MWLP and how flexible the MWLP should be in responding to the needs and requirements of the waste industry; which is often led by making the most of opportunities that present themselves, including the availability of specific units or pieces of land that may become available.

Development patterns

13. As referenced above the distribution of the network of facilities including the scale, and potentially catchment area of individual facilities, should ideally relate to the locational hierarchy for Cambridgeshire and Peterborough, the general development strategy of the local plans prepared by the districts and relationships with areas of growth and constraint.

14. The key urban areas in the MWLP area are Cambridge and Peterborough. However there a number of other urban areas that provide important functions within the plan area. Some provide more higher order functions than others. Broadly Huntingdon (and which includes Godmanchester and Brampton), St.Neots, St.Ives, Wisbech, March and Ely are the more higher order centres, with Chatteris, Soham, Whittlesey, Ramsey/Bury, Littleport, Camborne, Northstowe, and potentially Waterbeach, less so (and which also have a correspondingly smaller population).

15. There would be opportunities for waste development that is appropriate for an urban location to be sited in these centres, generally speaking on an industrial

estate or in a new development area at the edge of the settlement. Generally at predominantly B2 industrial estates, such locations would have the benefit of the waste use fitting in with its surroundings, being in most cases of a similar nature to the activities going on around it. Proposals would need to be commensurate with the population of the urban area and the nature/scale of the industrial area.

16. However not all of these urban areas have industrial estates to select from let alone a range of them. Peterborough has the widest range of general industrial areas, many as a consequence of its new town days. Wisbech, March and St. Neots have provision greater than at one location, whilst Huntingdon has a large industrial estate. Outside of, but close to, Cambridge the other locations do not have what could be termed industrial 'estate' locations although they do have locations where general industry is present. Cambridge, for an urban centre of its size, has limited industrial premises and these are under development pressure for redevelopment for business/office uses and/or residential. Cambridge is also surrounded by the Green Belt so the opportunities for waste-related development at the edge of the urban area, or in those settlements close to the city but which are quite urbanised, are also limited.

17. There are also a small number of urban areas adjacent or very close to the plan area (Royston, Stamford, Market Deeping, Newmarket and Haverhill) that could potentially accommodate waste management development on their fringe but within the plan area. However this is not considered appropriate to specifically plan for, particularly with limited new capacity needing to be found to 2036.

18. During the plan period new settlements will be progressed at Northstowe and Waterbeach and others could potentially come forward later on. Where the new settlement is significant in terms of the settlement hierarchy in the plan area then such locations and their allocated employment areas could be suitable for waste management development. New strategic development areas, like other areas, should also take some responsibility for managing their own community and business waste.

19. Outside of the main urban areas there are a number of standalone more rurally located but still large scale industrial areas. These include locations that were at one time in military airfield use and these therefore offer development opportunities, particularly to those waste uses that are not particularly appropriate to develop within urban areas.

20. Elsewhere in the rural areas including open countryside locations there is the potential for waste management facilities in certain instances but these should be more for specialised development, relating to farm holdings, that is best located in a rural area.

Industry interests

21. To inform options and assess such interest in identifying specific sites for waste development, at the Preliminary Draft Plan (issues and options) stage there was

a call for sites where the industry, landowners and agents were requested to put forward sites for potential waste use to be included as allocations in the MWLP.

22. In relation to waste management uses of a built nature (as opposed to inert and non-inert landfill), representations brought forward a number of proposed sites. Seven of these were allocations or part of allocations in the adopted Site Specific Proposals Plan (2012); these comprised two sites on the fringe of the Peterborough urban area, one location within the rural area north of Cambridge (but not in the Green Belt), three rural locations in Huntingdonshire district and one on the East Cambridgeshire/Suffolk border. A further seven new proposed sites were put forward, one of which was adjacent to an allocation in the adopted plan. These had a similar spread to the above, being: one on the Peterborough fringe; one to the north of Cambridge (but in the Green Belt); one in Huntingdonshire district; two in East Cambridgeshire (one close to the Suffolk border); and two in Fenland district at Wisbech and March.

23. If all of the above sites were to be considered through the site assessment process as appropriate to allocate, this would add additional capacity, but even if no allocations were made there would still be sufficient existing capacity to meet built waste management needs to 2036. The question though is whether the allocation of sites is an appropriate response; or whether to allow sites to come forward depending on what opportunities the market provides, and subject to plan policy. However, regardless, the MWLP should give direction through a spatial strategy.

Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012)

When the currently adopted Minerals and Waste Plan was being prepared it needed to address a substantial forecast shortall in waste management capacity over the period between 2006 to 2026. The approach taken in that Plan was to allocate specific sites to give a network of waste management facilities in the plan area. In total 34 site specific allocations were made for non-landfill waste management development. However, of the 34 non-landfill allocations only 10 have subsequently come forward and been permitted, whilst proposals have been approved on non-allocated sites. This experience suggests, especially given the conclusions of the Waste Needs Assessment in terms of forecast need, that it may not be appropriate for the new Plan to take the same approach.

Waste allocations

24. Owing to a combination of factors including past experience; the limited potential allocations put forward through the call for sites process; and the capacity gap not being substantial; and allied to the potential for the MWLP to give a clear spatial direction to the location of facilities through a spatial and criteria based policy, it has been concluded that there would not be significant benefits in allocating specific sites in the MWLP.

25. In reaching this conclusion it is noted that those who have put forward sites may be disappointed that their sites have not been allocated, as this would have provided an 'in principle' acceptance of the proposed development (at least in terms of its location). However, of the 14 potential allocations that were put forward through the call for sites process, 7 relate to existing allocations. Many of the sites that were put forward were also of a small scale and associated with adjacent waste uses on, or adjacent to, existing employment sites; and it is anticipated that a spatial criteria based policy could in principle support such development in these locations.

The proposed spatial strategy

26. Taking the foregoing discussion into account, including the opportunities and constraints to the location of waste management facilities, it has been concluded that the spatial strategy for the new MWLP should comprise a combined approach which will provide a broad spatial guidance coupled with policy criteria which will direct proposals to suitable locations; and which will include the identification of locations, such as general industrial land, or scenarios, where waste management use would be in principle be acceptable.

27. In considering the broad spatial direction to be provided, the key locations in the plan area are Cambridge and Peterborough, albeit that it is acknowledged that there are limitations in respect of Cambridge, including the Cambridge Green Belt which surrounds the City. It is also concluded that development at the other urban locations should be commensurate with their population and the proposed scale of growth.

28. The proposed spatial strategy for waste management (excluding disposal) is therefore as follows:

- Waste management facilities should be focussed at the urban areas in Cambridgeshire and Peterborough. Areas of focus will be:
  - The key urban areas of Cambridge and Peterborough.
  - The medium scale urban centres of Ely, Huntingdon, St.Ives, St.Neots, March and Wisbech.
  - The smaller urban centres of Chatteris, Littleport, Ramsey, Soham, Whittlesey, and the new settlement of Cambourne.

  The scale and catchment of facilities should reflect the role of the locale with respect to the locational hierarchy across the plan area.

- Where the proposed use and operations are compatible with urban development then industrial area locations would be preferred, but consideration should also be given to siting within new development areas or at locations adjacent to the urban area.

- New strategic development areas such as Northstowe and Waterbeach, will be expected to incorporate waste management facilities to enable communities and businesses to take more responsibility for their own waste.

- Within rural areas the development of facilities which are located on a farm holding, and which will facilitate agricultural waste recycling or recovery of waste generated by that site, will in principle be supported.

- Opportunities to co-locate waste management facilities together and with complementary activities will be supported particularly where relating to industrial estates, waste management sites, and mineral extraction and processing sites (for temporary proposals for aggregate and/or inert recycling facilities associated with extraction and processing) or where it would be planned as an integrated waste development. Co-location at specialist sites such as medical or research sites will also be supported in principle.

29. In relation to waste disposal, inert waste, hazardous and radioactive waste:
    - No further non-hazardous waste disposal should be provided for through specific allocations, and if capacity is required as the plan period progresses, this should be provided through extension to an existing disposal site, unless a stand alone site is shown to be more sustainable and better located.
    - Inert waste disposal should be focused at existing and allocated mineral extraction sites to facilitate restoration, to assist in delivering wider plan objectives of substantial net gain in biodiversity and flood risk management. .
    - Stable Non Reactive Hazardous Waste Disposal, if a need is demonstrated, should be located at an extension to existing disposal sites.

30. Given the quantity of arisings and spatial context within which Cambridgeshire and Peterborough is situated, there is currently no evidence to warrant development of facilities for the management of hazardous and radioactive wastes within the plan area. Hazardous waste disposal will only be supported in exceptional circumstance; and similarly landraising (owing to the predominantly flat nature of the plan area), will also only be permitted in exceptional circumstances.

Conclusion

31. Returning to the reference to national guidance in paragraphs 2 and 3, it is considered that through the identification of a spatial strategy for waste that the MWLP meets the requirements of guidance. It does this in the following manner:

    - Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations - *A spatial strategy for waste has been identified which identifies preferred locations.*

    - Consider waste management alongside other spatial planning matters - *The development of the spatial strategy is in line with the growth and investment agenda of partners, the strategies and emerging strategies of the (non minerals and waste) local plans and the overall settlement/locational hierarchy*

and constraints (e.g. Cambridge Green Belt) of Cambridgeshire and Peterborough.

- Enable communities and businesses to take more responsibility for their own waste - *The spatial strategy and the identification of urban areas within this seeks to balance provision; in addition new strategic development areas will be expected to incorporate waste management facilities to enable communities and businesses taking more responsibility for their own waste.*

- Plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle - *The Waste Needs Assessment associated with the MWLP has assessed the requirements for disposal against the permitted capacity and it is sufficient to accommodate Cambridgeshire and Peterborough's municipal waste management needs over the plan period, even allowing for some of London's waste still coming into the plan area. Proposals will have to demonstrate that they support the waste hierarchy; and by focussing waste management development at the existing or planned main urban areas such development will be in line with the proximity principle.*

- Recognise the relationship between catchment areas and economic viability; support opportunities for co-location of waste management facilities together and with complementary activities - *the opportunity to co-locate waste management facilities together and with complementary activities will be supported particularly where relating to industrial estates, waste management sites and mineral extraction and processing sites and at appropriate specialist sites such as medical or research sites.*

- Give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages - *Substantial weight will be given to the use of suitable brownfield land within identified urban areas. Waste management proposals located on farm holdings for agricultural waste recycling and recovery generated by that farm will be supported. The plan area has limited forestry, being largely agricultural in nature, with extensive areas of open fenland.*