



The countryside charity
Cambridgeshire
and Peterborough

The Town Hall, Market Hill
St Ives, Cambridgeshire
PE27 5AL

www.cprencambs.org.uk
Email: office@cprecambs.org.uk

9th October 2026

To: Cambridgeshire County Council and Peterborough City Council

By Email to: mandwpolicy@cambridgeshire.gov.uk

Response to the Cambridgeshire and Peterborough Minerals and Waste Local Plan Review Regulation 45 Scoping Consultation and Call for Sites – 2026

1. Introduction

CPRE Cambridgeshire and Peterborough welcomes the opportunity to comment on the preparation of the new Cambridgeshire and Peterborough Minerals and Waste Local Plan. The Branch recognises the essential role of minerals and waste planning in supporting homes, employment, infrastructure required and the transition towards a more circular and resource-efficient economy.

The new Plan must form an integral part of the wider plan-led system. It should not merely provide minerals and waste capacity to support housing and economic growth; it must also define the environmental, infrastructure and community limits within which growth delivered sustainably. The current Minerals and Waste Local Plan adopted on 28 July 2021 and provides the existing framework to 2036. The replacement Plan is being prepared at a time of substantially increased development pressure, major new settlements and urban extensions, water-resource constraints, biodiversity decline, climate change and significant infrastructure requirements.

2. Strategic relationship with growth plans

The Minerals and Waste Plan must be prepared alongside, and in active coordination with, the adopted district and city Local Plans, Neighbourhood Plans, emerging Local Plans, the Proposed Greater Cambridge Local Plan alongside required and timely delivery of infrastructure required to meet major strategic development proposals.

The Proposed Submission Greater Cambridge Local Plan identifies approximately 11,000 homes at Waterbeach New Town, including 5,629 homes within its plan period, together with employment and supporting infrastructure. Its infrastructure policies state that transport, water, energy, digital, health, education, cultural, waste, social and green infrastructure be provided in the right places and at the right times to serve existing and growing communities.

This illustrates why the Minerals and Waste Plan cannot be prepared independently of the wider growth strategy. Mineral supply, construction waste, household waste, commercial waste, recycling, waste-water treatment provision and transport requirements will all be affected by the scale and distribution of growth.

3. Existing communities must not bear disproportionate cumulative impacts

CPRE is concerned that existing rural communities could become the default locations for a succession of mineral extraction and waste and infrastructure impacts. Individual developments may each appear capable of mitigation while their combined effects are substantial.

Cont'd...

The new Plan should therefore require cumulative assessment of minerals and waste proposals alongside housing, employment, transport, energy, wastewater treatment and other required infrastructure. Cumulative effects should be considered in tandem for site selection and at development-management stage.

Communities should not be required to accommodate developments that may be acceptable individually but whose cumulative effects on health, quality of life, landscape, traffic, biodiversity, water or agricultural land are unacceptable.

4. New settlements and strategic growth

New settlements must have minerals and waste infrastructure planned as part of their development strategy rather than relying on existing facilities to absorb additional demand.

For major growth locations the Plan should identify, as far as possible, requirements for construction and demolition waste, household and commercial waste, recycling, food and green waste, resource recovery, secondary aggregates and other circular-economy infrastructure.

Infrastructure capacity should be demonstrated before growth is assumed to be deliverable. This principle is particularly important where development is dependent upon major water, wastewater, transport or energy infrastructure.

5. Water resources and the water environment

Water should be treated as a strategic constraint in minerals and waste site selection. The Plan should address groundwater, aquifers, rivers, wetlands, flood risk, water-dependent habitats, wastewater capacity, surface-water management and Water Framework Directive objectives.

Mineral extraction can directly affect groundwater and surface-water systems. Waste facilities can create risks from runoff, leachate, contamination and drainage. No site should be allocated merely because land is available where the water environment cannot sustainably accommodate the development.

6. Climate change and carbon

The new Plan should explicitly contribute to climate-change mitigation and adaptation. Carbon consequences should be assessed across extraction, processing, transport, waste treatment, restoration and land-use change.

The Plan should prioritise waste prevention, reuse, recycling, secondary and recycled aggregates, local circular-economy infrastructure and reduced transport distances. Carbon-rich soils, peat and fenland systems, vegetation and other carbon stores should be considered in strategic site selection.

7. Agricultural land and food security

Cambridgeshire contains some of England's most productive agricultural land. The Plan should therefore provide strong protection for high-quality agricultural land and require cumulative assessment of agricultural land loss.

Cont'd...

Restoration should not be assumed to recreate agricultural value automatically. The quality, duration and effectiveness of restoration must be demonstrated, with restoration objectives defined before extraction begins.

8. Biodiversity and nature recovery

The Plan should place biodiversity and ecological recovery at the centre of minerals and waste planning. This includes designated sites, ancient woodland, veteran trees, hedgerows, priority habitats, rivers, wetlands, protected species, ecological networks and Local Nature Recovery Strategies.

Biodiversity Net Gain should not be treated as a substitute for avoidance of harm. The Plan should apply the hierarchy: avoid, minimise, mitigate, restore, and compensate only as a last resort.

9. Landscape, tranquillity and rural character

Landscape should be considered as more than visual appearance. The Plan should recognise tranquillity, recreation, landscape character, settlement separation, cultural identity and the cumulative industrialisation of rural areas.

Minerals and waste facilities can have long-term effects on the character of Fenland and rural landscapes. Strategic site assessment should therefore consider cumulative landscape and visual effects, public rights of way, recreational routes and important views.

10. Heritage and archaeology

The Plan should recognise the exceptional archaeological and historic environment of Cambridgeshire and Peterborough. Mineral extraction can result in irreversible impacts. Strategic assessment should therefore consider designated and non-designated heritage assets, archaeological potential, historic landscapes and the settings of heritage assets before sites are allocated.

11. Human health, amenity and quality of life

Health should be a substantive consideration in the plan preparation. Dust, particulate matter, air pollution, noise, vibration, traffic, visual intrusion, loss of tranquillity and reduced access to countryside can affect health and wellbeing.

The Plan should consider cumulative environmental burdens rather than treating each facility as an isolated source of impact.

12. Human rights and equality

The preparation and implementation of the Plan should give regard to the Human Rights Act 1998, including Article 8 and Article 1 of Protocol 1, where planning decisions may affect homes, private and family life or peaceful enjoyment of possessions. Any interference must be lawful, necessary and proportionate.

Cont'd...

The Plan should also consider the Public Sector Equality Duty and whether certain communities or groups may experience disproportionate effects, including children, older people, disabled people, people with health vulnerabilities and communities already experiencing multiple environmental pressures.

13. Transport and rural roads

The Plan should apply a proximity principle to waste wherever practicable while ensuring that facilities do not create unacceptable HGV movements through villages.

Site assessment should consider road capacity, HGV routing, bridges, weight restrictions, schools, pedestrian and cycle routes, public rights of way, road safety, congestion, carbon emissions and cumulative traffic from other proposed development.

14. Circular economy and mineral resources

The Plan should move beyond a simple capacity-based approach. Waste prevention, reuse, repair, recycling, recovery and secondary materials should be prioritised before disposal and, where practicable, before reliance upon new primary extraction.

Mineral safeguarding should identify resources without creating a presumption that they will be worked. Primary extraction should remain subject to environmental, water, agricultural, landscape, ecological, heritage, transport, climate and community considerations.

15. Restoration and aftercare

Restoration should be designed before extraction takes place and should be capable of delivering measurable long-term environmental value. Depending upon location, this may include nature recovery, wetland creation, flood management, habitat connectivity, public access, recreation, landscape enhancement, carbon sequestration and agricultural restoration.

The Plan should require appropriate financial security so that restoration and aftercare remain deliverable if operators change or economic circumstances alter.

16. Site assessment and selection methodology

CPRE supports a transparent, evidence-based site assessment and selection methodology. It should ensure that environmental and community constraints can materially affect whether a site proceeds to allocation, rather than merely being recorded as matters for later mitigation.

17. Sustainability Appraisal and alternatives

The Sustainability Appraisal should be substantive and should test genuine reasonable alternatives. It should assess climate, biodiversity, water, landscape, agriculture, soils, air quality, noise, health, transport, heritage, resource use, communities, carbon and cumulative effects.

The appraisal should demonstrate why the preferred spatial strategic strategy and sites perform better against the full range of relevant environmental and social objectives.

Cont'd...

18. Monitoring and review

The Plan should include measurable monitoring of mineral extraction, landbank, agricultural land loss, restoration, biodiversity outcomes, water impacts, HGV movements, air quality, noise, waste arisings, recycling, residual waste, greenhouse-gas emissions, community complaints and cumulative development pressures.

Where monitoring identifies unforeseen harm, there should be a clear mechanism for corrective action and plan review.

19. CPRE recommendations

CPRE asks the authorities to ensure that the new Plan:

- is fully integrated with adopted and emerging Local Plans and Neighbourhood Plans;
- reflects the scale and spatial distribution of planned growth;
- plans minerals and waste infrastructure alongside major development;
- introduces robust cumulative-impact assessment;
- treats water resources as a strategic constraint;
- protects high-quality agricultural land;
- strengthens landscape and tranquillity protection;
- embeds biodiversity and nature recovery in site selection;
- protects existing communities from disproportionate concentrations of impacts;
- provides appropriate infrastructure for new communities;
- prioritises waste prevention, reuse, recycling and circular-economy principles;
- supports secondary and recycled aggregates;
- requires high-quality restoration and financial guarantees;
- considers health, equality and human-rights implications;
- tests genuine spatial alternatives;
- addresses cross-boundary impacts; and
- establishes effective monitoring and review.

20. Conclusion

CPRE supports the preparation of a new Minerals and Waste Local Plan which enables necessary minerals supply and sustainable waste management. However, the Plan must recognise that Cambridgeshire and Peterborough are experiencing a period of exceptional development and infrastructure change.

The finite capacity of the area's water resources, agricultural land, soil, landscapes, biodiversity, heritage and communities must be treated as genuine planning considerations rather than resources which can simply be assumed to accommodate continuing growth.

The new Plan should adopt an infrastructure-led, environmentally responsible, and community-centered approach. It should ensure that the needs of existing communities and future residents are considered together and that development does not create cumulative environmental or social burdens which are unacceptable when viewed as a whole.

Cont'd...

CPRE therefore asks the authorities to use this review to establish a Minerals and Waste Plan capable of supporting necessary development while protecting the environmental quality, landscape character, agricultural resource and quality of life of the communities it serves.

Yours faithfully,

Jane M Williams
On behalf of CPRE Cambridgeshire and Peterborough Branch

Principal official sources

Cambridgeshire County Council – Minerals and Waste Local Plan Review, Regulation 45 Scoping Consultation and Call for Sites (2026): <https://yourvoice.cambridgeshire.gov.uk/mw/mwlp-review-scoping/>

Cambridgeshire County Council – adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted 28 July 2021): <https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan>

Greater Cambridge Shared Planning – Proposed Submission Greater Cambridge Local Plan (2026): <https://greatercambridgeplanning.org/local-plan>

Greater Cambridge Shared Planning – Policy S/WNT Waterbeach New Town: <https://consultations.greatercambridgeplanning.org/proposed-submission-greater-cambridge-local-plan/site-allocations/new-settlements/policy-swnt>

National Planning Policy Framework, December 2024: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

National Planning Policy for Waste: <https://www.gov.uk/government/publications/national-planning-policy-for-waste/national-planning-policy-for-waste>

Planning and Compulsory Purchase Act 2004 and relevant amendments: <https://www.legislation.gov.uk/ukpga/2004/5>

Human Rights Act 1998: <https://www.legislation.gov.uk/ukpga/1998/42>

Equality Act 2010: <https://www.legislation.gov.uk/ukpga/2010/15>

Environmental Assessment of Plans and Programmes Regulations 2004: <https://www.legislation.gov.uk/uksi/2004/1633>