

Please see attached Greater Cambridge Shared waste preliminary comments regarding the Brookgate application 22.02771.OUT Cambridge North Station.

Council waste-related Comment 1.

The vehicle tracking page needs to be in a form that shows the entire development and the journey that the refuse truck will take through the development. We are unable to work from snapshots as we need to understand where the vehicle enters/exits and travels to in between.

Response

Reworked as requested, and re-presented as Drawing 05425-C-2208.

Also importantly the vehicle type/size used to track appears to be incorrect. Im attaching two vehicle specs. One is for overground and the other our underground vehicle. Tracking needs to be conducted against a 32 tonne refuse truck for all developments and this is regardless of whether collections are overground or underground.

Response

Reworked with the vehicle details provided by the Council, for overground collection approach, as per Drawing 05425-C-2208.

Council waste-related Comment 2.

I note that bin capacities are incorrect and there are references to the RECAP guide and also Westminster Council too. Perhaps the Westminster references are an oversight ? Neither of those should be used when assessing capacities and basic collection requirements (e.g. drag distances for crews, bin store requirements, bin types etc). I have attached the GCSWS Planning Guide that Bode was referring to during our meeting and would strongly urge the developer to go through it, note our requirements and complete the checklist before resubmitting.

Response

RECAP guidance used in applicant document production, as current guidance (GCSWS 2021) not known to the applicant's advisor – thank you for providing – as internet search did not reveal and approach to the Council was to no effect, unfortunately.

Waste generation and bin requirements, reworked using the numbers provided in GCSWS, are represented in the revised draft Operational Waste Management Plan. Other requirements, such as drag distances, etc., have been confirmed as appropriate to reflect the move from RECAP to GCSWS guidance/ requirements, as per the revised draft Operational Waste Management Plan.

NOTE that the reference to the Westminster data stems from the non-residential waste generation rates referenced in the RECAP document Page 22, which at the time of the document production for Cambridge North had been revised from those presented in the RECAP document.

NOTE that there are no alternative waste generation rates for non-residential developments contained in the GCSWS.

Bring Sites will apply once there are 800 dwellings occupied.

Response

Thank you, noted and understood, although this application is limited to approximately 425 properties.

The guide does include some information regarding commercial waste collections also which I think is helpful in view of how many commercial premises there will be.

Response

Cambridge North draft Operational Waste Management Plan document revised accordingly, and re-issued

Council waste-related Comment 3.

We find it most helpful to meet with developers as early as possible and go through their plans via Teams meetings as this does help to clarify collection requirements and iron out issues at the earliest stage, so please do feel free to suggest a meeting with them once you are in a position to.

Response

Contact was attempted prior to the first submission, without success, but the offer is welcomed, thank you.

Further to our preliminary comments on 28 July 2022. Could the following be added as GCSWS response to the Brookgate application 22.02771.OUT Cambridge North Station.

Council waste-related Comment - 4

The Greater Cambridge Shared Waste Service is striving for innovative resource management that achieves net zero carbon, embodies the waste hierarchy promoting reuse and avoiding generation of waste. As a Waste Collection Authority, we are tackling our carbon footprint associated with collection of materials including rapid decarbonisation of our fleet of refuse collection vehicles. The Service understands the role it plays, with other local partners, to create high quality spaces and streetscapes, and as such has provided [waste storage and collection guidance for Developers in the Greater Cambridge area](#).

The Brookgate application is disappointing as it does not share the same aspirational approach to resource management, nor has it taken the opportunity to showcase a comprehensive and integrated approach to materials storage and collection within a high-density environment.

Radical change to waste management and consolidated effort to move towards a circular economy demands a break away from conventional waste storage and collection in our new communities. The Service expects all Developers of high-density schemes to consider underground bin systems as their first option, or similar alternative collection systems such as Envac, with the benefits of cost effectiveness for both Developers and Waste Collection Authorities. This storage and collection method goes hand in hand with the extensive behavioural change campaigns which the Service undertakes to encourage householders and businesses to reduce before recycling, and reuse and repair before disposal.

To summarise, the applicant's approach to storage and collection of residual waste and recycling does not align with the GCSWS's vision for high quality, net zero carbon streetscapes which integrate simple, cost-effective approaches to resource management befitting of ways in which our communities wish to live.

Response

The Council's preference for the provision of some form of non-conventional approach to the management of solid waste across the Cambridge North development by Brookgate is noted.

Whilst an over-arching, development-wide approach has been both considered and reviewed by Brookgate, as developer, not to move to this approach has come about as a result of a positive decision-making approach rather than inertia.

While the whole development maybe classed as (relatively) high density, in reality it is not, as what is proposed is both spread across a substantial area of land and is split between different land-uses – these combined elements effectively serve to reduce the intensity of individual development – thus in effect losing the benefits of scale which may otherwise apply to a genuinely elevated intensity of development. Additionally, it is important to enable the management of solid waste to be considered on an individual land-use basis, in order to avoid risk of fettering any one element against another / the remaining elements.

For these reasons, it has been determined that the commercial element will be allowed to manage its own waste in accordance with its preferences, most likely to involve servicing by a 3rd-party commercial organisation as opposed to the Council, while the residential element is likely to be split into two separate servicing approaches, namely a 3rd-party approach for the 'build-to-rent' element (where ownership will be retained by an organisation as opposed to the occupier) and a Council-based approach for the 'private-for-sale' or affordable elements.

The conscious segregation of these elements, for sound operational and commercial reasons, effectively removes any possible benefits-of-scale approach which would otherwise be required in order to justify a single-source type of approach as would be required for, say, the installation of an underground system.

It is noted that GCSWS recognises this as a possible constraint / prevention to the use of such an all-encompassing system.