

Outcomes Report from Preferred Option

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Introduction

1 Introduction

Introduction

1.1 The Joint Waste Development Plan Document (JWDPD): Preferred Option Report from here on referred to as the 'Report' set out our approach to planning for waste in Greater Manchester. This Outcomes Report outlines comments received as part of the six week consultation. Where changes are required, these will be reflected in the final draft of the Waste Plan, which will be made available for consultation in November 2010.

Background

1.2 The Report was issued for public consultation from Friday 13th November 2009 to Friday 8th January 2010 and was made available both online and at deposit points throughout Greater Manchester in line with the Statements of Community Involvement of the 10 Local Authorities. Consultees were able to respond online using the Limehouse Consultation system or by written response.

1.3 There was a total of 28 responses received from individuals and 35 responses from organisations as a result of this consultation. The organisations which responded are as follows:

- East Lancashire Railway (ELR)
- Horwich Town Council
- Viridor Waste Management
- The Ramblers Association (Manchester and High Peak Area)
- Government Office North West
- 4NW Regional Leader Forum (formerly the North West Regional Assembly)
- Natural England
- Greater Manchester Waste Disposal Authority
- Environment Agency
- Merseyside Environmental Advisory Service
- Peel Holdings Ltd
- Salford CC
- Stockport MBC
- Wigan MBC
- Oldham MBC
- Chadderton District Partnership
- Tameside Council
- Cheshire and Cheshire West Council
- West Lancashire District Council
- Derbyshire County Council
- National Grid
- Manchester Airport
- Ramblers Association, Manchester Area

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- United Utilities (Infrastructure Holdings)
- Minerals Planning Group/Sky Properties
- Carter Jonas
- Greater Manchester Archaeological Unit
- Tameside MBC
- Mosaic Planning (on behalf of Stevenor Investments)
- Indigo Planning (on behalf of Seddon Developments)
- Enzygo Ltd (on behalf of The Industrial Trust)
- The Coal Authority
- MJM Strategies
- The Emerson Group
- Network Rail

1 Aims and Objectives

- 1.1** This section sets out the Questions made available for public comment in relation to the Aims and Objectives of the Waste Plan, a summary of the responses received and recommendations for dealing with them.
- 1.2** At the next stage of consultation, the Publication draft stage, the overall approach taken will be subject to Sustainability Appraisal. So where responses received through consultation here are used to inform the Publication draft DPD approach it will receive assessment at that stage.

Strategic Aim

Question 1

- 1.3** Do you agree with the strategic aim as expressed in the Preferred Option approach? Is there anything else we need to include in the strategic aim?

Table 1 Responses to Question 1

Response recieved	No. Of Responses	Respondents
Agree with Strategic Aim	8	Viridor Waste Management, The Ramblers Association, Stockport MBC, Cheshire West and Cheshire Council, Natural England, the Greater Manchester Waste Disposal Authority (GMWDA), MEAS, Carter Jonas and the Environment Agency
Suggested addition to Strategic Aim	3	Government Office North West and Cheshire West and Chester Council

- 1.4** The comments relating to the Strategic Aim are set out in the table below.

Aims and Objectives

1 Aims and Objectives

Table 2 Strategic Aim Representations

Respondent	Representation	Commentary
Viridor Waste Management	Viridor agree with the Strategic Aim as expressed in the Preferred Option approach	The representations regarding the Strategic Aim support the current wording.
The Ramblers Association	The Ramblers Association agree with the Strategic Aim as expressed in the Preferred Option approach	Noted
Government Office North West (GONW)	GONW believe that the Strategic Aim has been usefully clarified. GONW suggest, though, that the period covered by the plan is contained in the strategic aim.	The suggestion to refer to the period covered by the plan will be included within the next stage of the waste plan.
Stockport MBC	Stockport Council supports the proposed strategic aim of the Greater Manchester Joint Waste DPD as set out in Statement 1 of the Preferred Option document.	Noted
Cheshire West and Chester Council	The Council agrees with the strategic aim although is of the opinion the aim should also make reference in the purpose to meeting the waste management needs of Greater Manchester.	The need to amend the aim in relation to setting out the need for waste facilities will be explored during the development of the next stage of the Waste Plan.
Natural England	Natural England believe the strategic aim provides a good overview of the purpose of the Waste Plan and highlights that	The suggestion to amend the aim to incorporate the protection and enhancement of the natural environment

Aims and Objectives

Respondent	Representation	Commentary
	<p>waste facilities must be located “in the right place”. However, they would welcome some expansion on this to incorporate mention of the need for the protection of the natural environment within the provision of waste facilities, or even some recognition of the potential to use development of waste facilities to enhance aspects of the natural environment (e.g. through habitat creation within the development site).</p>	<p>when considering waste development will be explored during the development of the next stage of the Waste Plan.</p>
GMWDA	<p>The Strategic aim encompasses all the key aspects required of a waste plan in that the spatial planning framework will provide timely opportunities for waste management sites to be brought forward in line with National and Regional policies.</p>	<p>Noted.</p>
MEAS	<p>The final sentence should make specific reference to provision “.. to meet identified waste management needs ...” (as per PPS10). Should it also express a broader ambition given the duration of the planning period, perhaps by referring directly to Sustainable Development, Sustainable Consumption</p>	<p>The need to amend the aim in relation to setting out the need for waste facilities will be explored during the development of the next stage of the Waste Plan. Including a reference to Sustainable development, Sustainable consumption and Production, Climate Change and Renewable Energy is recognised as being</p>

1 Aims and Objectives

Respondent	Representation	Commentary
Carter Jonas	<p>& Production, Climate Change and Renewable Energy (particularly the last two) since they are repeatedly identified in recent government documents as the major cross-cutting policy issues that waste and other industries are expected to deal with in the future? Without such references Statement 1 has a relatively short-term feel to it.</p>	<p>important given recent government guidance, and therefore their inclusion within the aim will be explored during the development of the next stage of the Waste Plan.</p>
The Environment Agency	<p>The Strategic Aim is consistent with national, regional and local policy and guidance and is acceptable.</p> <p>We agree with the strategic aim as it emphasises the need for right type of new waste facilities to be located in the right place at the right time.</p>	<p>Noted</p> <p>Noted</p>

Response

1.5 The wording of the Strategic Aim will be reviewed in light of the comments received, where changes suggested improve the overall aim of the Waste Plan these will appear in the Publication stage of the Plan.

Aims and Objectives

Strategic Objectives

Question 2

1.6 Do you agree with the objectives as expressed in the Preferred Option approach? Is there anything else we need to include in the strategic objectives, or do any need to be removed or amended?

Table 3 Responses to Question 2

Response received	No. of Responses	Respondents
Agree with the Strategic Objectives	9	Viridor Waste Management, Ramblers Association, Stockport MBC, Cheshire West and Chester Council, GMWDA, Sky Properties, MEAS, Carter Jonas and the Environment Agency
Changes to Strategic Objectives suggested	6	The Ramblers Association, Cheshire West and Chester Council, Natural England, Mineral Planning Group (MPG), Sky Properties and the Environment Agency

1.7 The comments relating to specific Strategic Objectives are set out in the table below.

Table 4 Strategic Objectives Representations

Respondent	Representation	Commentary
Viridor Waste Management	Viridor agree with the Strategic Objectives as expressed in the Preferred Option approach	Noted

1 Aims and Objectives

Respondent	Representation	Commentary
The Ramblers Association	<p>The Ramblers Association agree with the Strategic Objectives as expressed in the Preferred Option approach. They also suggest another objective be added covering Green Belt 'Objective 9: To demonstrate that there are no acceptable sites outside the Green Belt before developing on Green Belt land.'</p>	<p>The suggestion to include an additional objective covering the approach to identifying sites within the green belt will not be taken forward. National planning policy makes it clear that siting waste facilities within the greenbelt, although not desirable, should not be discounted.</p> <p>Due to the constraints associated with identifying residual waste disposal sites in Greater Manchester it is not appropriate for the Waste Plan to rule out sites located within the greenbelt. This is an issue to be dealt with at the planning application stage of such sites.</p> <p>In relation to sites/areas suitable for built waste facilities, the adopted methodology has screened out those located in the greenbelt due to the relative abundance of suitable land outside the greenbelt.</p>
Stockport MBC	<p>Stockport Council supports the proposed objectives of the Greater Manchester Joint Waste DPD as set out in Statement 2 of the Preferred Option document.</p>	<p>Noted</p>

Aims and Objectives

Respondent	Representation	Commentary
Cheshire West and Chester Council	The Council agrees with the proposed objectives, however, the strategic objectives could also make reference to “communities taking responsibility for their own waste” in line with Planning Policy Statement 10.	The suggestion to include ‘communities taking responsibility for their own waste’ will be included within the next stage of the waste plan. This fits well with the approach taken to site allocation.
Natural England	<p>Natural England would welcome an addition to Objective 3 to recognise the potential for the utilisation of waste in renewable energy generation.</p> <p>Natural England commend the inclusion of Objective 7, which recognises the importance of protecting the sub-region’s natural environment, biodiversity and geodiversity. However, they would also welcome reference to the protection and enhancement of the landscape within this objective.</p>	The additional wording for objectives 3 and 7 suggested by Natural England will be explored for inclusion within the next stage of the Waste Plan. The suggestions would seem to fit with the direction of the emerging policies.
GMWDA	<p>Objective 1</p> <p>Agree. The Waste Plan should ensure waste is dealt with in a sustainable manner.</p> <p>Objective 2</p>	To clarify, the need to decouple waste growth from economic growth has been the subject of much discussion at earlier stages of the Waste Plan. Decoupling in this context aims to break the link between economic progress and growth in Greater Manchester from any

1 Aims and Objectives

Respondent	Representation	Commentary
	<p>Agree. The Waste Plan should support the Waste Hierarchy, whilst recognising a need for landfill capacity in the area.</p> <p>Objective 3</p> <p>Agree. The Waste Plan should assist in reducing greenhouse gas emissions.</p> <p>Objective 4</p> <p>The influence of a planning document on this objective to decouple waste growth from economic growth is likely to be fairly limited, as the planning system can only target new developments while economic growth applies to all services and sectors. Moreover, decoupling waste growth from economic growth is essentially waste prevention/minimisation (covered in objective 2) which applies the waste hierarchy, so it is questionable whether this objective is really necessary.</p> <p>Objective 5</p> <p>A flexible approach is required, however, this is more important to allow the delivery of facilities in a timely manner to meet</p>	<p>associated increase in waste arisings. Eliminating the need for additional waste facilities through sustainable commercial practises. In relation to objective 4 it is recognised that the Waste Plan may have only a limited role in decoupling waste growth from economic growth, however this is an important issue across the region and Greater Manchester and therefore should remain as part of an objective.</p> <p>Objective 5 aims to recognise the role of new technologies where appropriate which are unknown at this time, a more 'conditional wording will be explored for inclusion at the next stage of the Waste Plan to make this clearer.</p>

Aims and Objectives

Respondent	Representation	Commentary
	<p>demand, rather than allowing emerging technologies to come forward. The planning system should not seek to favour new, over established, technologies. Rather it should consider the need of the technology in terms of waste treatment requirements.</p> <p>Objective 6</p> <p>Agree. The protection of quality of life is important.</p> <p>Objective 7</p> <p>Agree, protecting the sub-region's natural environment, biodiversity, geodiversity, cultural and historic heritage is important.</p> <p>Objective 8</p> <p>Agree. It is important to reduce the movement of waste.</p>	
Mineral Planning Group (MPG)	We need to recognise that desk based studies will always have some imperfections and are often limited by who owns what land at the time of the studies.	We recognise the importance of this issue, and the policies of the

1 Aims and Objectives

Respondent	Representation	Commentary
Sky Properties	<p>Land ownership of sites and the science of waste is constantly changing and the objectives MUST therefore have a built in element of flexibility to cope with these changing circumstances including "windfall" sites in waste recycling etc.</p> <p>We support the overall objectives but would add that waste development, particularly at present, provide opportunities to bring forward under-used or vacant general industrial sites. It would be appropriate to reflect the economic benefits of waste development within the overall aims of the plan.</p>	<p>Waste Plan are based on such knowledge.</p> <p>The benefits of appropriately planned waste development are enshrined within the Waste Plan, and have been referred to within the previous stages of the Plan. Therefore the suggested inclusion of this within the aims or objectives of the plan will be explored during the development of the next stage of the Waste Plan.</p>
MEAS	<p>"Generally we are in agreement with all these objectives.</p> <p>For Objective 1 we suggest there could be a specific reference to meeting identified needs.</p> <p>For Objective 4, it is not clear how the Waste DPD would take a leading, influential role in decoupling waste and growth. Should the verb be "to assist", rather than "to ensure"?</p>	<p>Noted, all suggestions will be explored during the development of the next stage of the Waste Plan.</p>

Aims and Objectives

Respondent	Representation	Commentary
Carter Jonas	<p>Finally, Objective 7 refers to protection of the natural environment which is half of the key requirement in Article 3(12)(b) of the revised Waste Framework Directive. Should Objective 6 not also refer explicitly to the other half - ie. protection of human health, which a specific aspect of the quality of life?"</p>	
The Environment Agency	<p>The objectives expressed appear to capture all the important elements of the key waste management and planning documents. Objective 6 could possibly be expanded to encapsulate the direction given by the NW RSS to ensure that communities take more responsibility for the waste they produce.</p>	<p>Noted.</p>
		<p>Noted. Suggested change to objective 6 will be explored during the development of the next stage of the Waste Plan.</p>

Response

1.8 All representations regarding the Strategic Objectives support the current wording with the addition of a number of useful amendments. The wording of the Strategic Objectives will be reviewed in light of the comments received, where changes improve the overall objectives of the Waste Plan these will appear in the Publication stage of the Plan.

Aims and Objectives

Future Waste Management Requirements

2 Future Waste Management Requirements

Future Waste Management Capacity

2.1 This section sets out the Questions made available for public comment in relation to the future waste management capacity requirements in Greater Manchester, along with a summary of the responses received as part of the consultation and recommendations for dealing with them.

Question 3

2.2 Do you agree with the Preferred Option approach to future waste requirements as set out in Policy Direction 1: 'Capacity requirements'? Is there anything else we need to include?

Table 5 Responses to Question 3

Response Received	No. of responses	Respondents
Agree with Preferred Options approach to future waste requirements	8	Viridor Waste Management, The Ramblers Association, Stockport MBC, Cheshire West and Chester, GMWDA, MEAS, Carter Jonas and the Environment Agency
Disagree with Preferred Options approach to future waste requirements	3	Derbyshire County Council and Sky Properties
Suggested additional information for Preferred Options approach to future waste requirements	4	Government Office North West, Cheshire West and Chester Council, GMWDA and MEAS
Other	1	MPG

2.3 The outcomes relating to capacity requirements are set out in the table below.

Future Waste Management Requirements

Table 6 Capacity Requirement Representations

Respondent	Representation	Commentary
Viridor Waste Management	Viridor agree with the Preferred Option approach to future waste requirements as set out in Policy Direction 1: 'Capacity requirements'	Noted
The Ramblers Association	The Ramblers Association agree with the Preferred Option approach to future waste requirements as set out in Policy Direction 1: 'Capacity requirements' although they stress that they have 'no expertise on this'.	Noted
Government Office North West (GONW)	GONW state that "it will be important to establish what role the Ince Marshes plant can play and to examine the sustainability implications of this alternative. Until these issues have been explored further it is not possible to conclude that the Preferred Option is the most appropriate strategy when considered against the reasonable alternatives, a key test of soundness."	Noted. The importance of the Ince Marshes proposal and continued work with Peel Environmental is recognised, to gain a fuller understanding of the potential impacts of this development on the need for facilities in Greater Manchester. During the development of the next stage of the Waste Plan further information will be sought on this issue and clarification will be provided.
Stockport MBC	So as to provide greater clarity, particularly in relation to how the Policy Direction will help to achieve objective 2, the Council suggests that the first paragraph within the Policy Direction be amended as follows: The capacity identified within Table 2 'Capacity gap, indicative number of facilities required and when these facilities will be required' will be brought forward within Greater Manchester by 2026. Additional facilities will only be permitted where applicants can clearly demonstrate that	The suggested additional text will be explored during the development of the next stage of the Waste Plan.

Future Waste Management Requirements

Respondent	Representation	Commentary
Cheshire West and Chester Council	<p>there is a proven need for additional waste management facilities and that the waste proposed to be treated cannot be dealt with more sustainably, higher up the waste hierarchy.</p> <p>It must be ensured that sufficient recycling provision is being made throughout the plan period. Additional supporting text may be required to clarify what would happen if the PFI failed to deliver and that there is sufficient buy in to the policy from the Merseyside Authorities. The preferred options reports cites the regionally significant proposal at Ince Marshes, for a Resource Recovery Park and Combined Heat and Power Facility (which received planning consent in August 2009) as a proposal that could be taken into account in the need assessment for meeting some of Greater Manchester’s waste management needs, although it has not been built into the need assessment as yet. If such an approach was to be adopted in preparing the Submission Document it should take account of all proposals in the North West with the potential to take waste from outside the sub region in which it is located. The approach must also acknowledge the risk to the overall planning strategy of assuming that planned waste management capacity will be delivered or that the proposed capacity will be both suitable and available to meet the required waste management needs of Greater Manchester.</p>	<p>Noted. The importance of assessing the potential of all facilities which meet a regional need is recognised and included within any assessment of need for waste facilities in Greater Manchester. This information will be considered within the forthcoming review of the needs assessment which will inform the next stage of the Waste Plan.</p>

2 Future Waste Management Requirements

Respondent	Representation	Commentary
Derbyshire County Council	<p>Derbyshire County Council disagrees for the following reasons:</p> <ol style="list-style-type: none"> The Report does not explain why “the Waste Plan must strike a balance between allowing the development of too many waste facilities (known as over provision) and not planning for sufficient facilities to deal with the waste arisings”. Over-provision is not necessarily bad. In this case, it would be unwise to risk “not planning for sufficient facilities”. There is no need to restrict the choice of waste management developments. Indeed, government policy is to provide a variety of sites, to give flexibility and encourage innovation. Sites can have a permission for several different developments, so the fact that a site may, as a result of “over-provision”, have an unimplemented waste permission need not prevent it from being developed (with permission) for, say, industry. Waste data is not absolute and prediction is hazardous. The policy riskily assumes that the capacity gap estimate is sufficiently reliable to provide a basis for restricting development. 	<p>Striking a balance between over provision of facilities and not planning for sufficient facilities has been well documented through earlier stages of the Waste Plan (Issues and Options stages). The approach taken is supported by National Planning Policy and has been endorsed by consultees during earlier stages. The approach proposed for safeguarding specific site allocations means that if far more facilities are allocated than would meet the requirements there would be a risk of sterilising land from non waste development.</p> <p>Waste Management Types indicated for each site/area allocation have been guided by the Sustainability Appraisal, desk based assessment and underpinned by the overall approach to meeting the capacity gap in relation to the waste hierarchy. Importantly the ability of an allocated site to accommodate broad types of waste development has been assessed. The waste management types are broad categories which are not technology specific, this gives the waste industry scope for innovation within agreed parameters.</p> <p>The Waste Plan will allocate both sites and areas. The need to ensure the capacity gap is addressed has led to the decision that 'sites' will be safeguarded</p>

Future Waste Management Requirements

Respondent	Representation	Commentary
	<p>5. The policy conflicts with the plan's stated aim of "maximising recycling and recovery of waste" (paragraph 3.8) and diverting from landfill, which implies a need to encourage an abundance of recovery sites.</p>	<p>from other forms of development and therefore will not be available unless evidence can be provided that the site is no longer required. The site allocations will provide the certainty that the capacity gap can be met. The 'area' allocations will be more flexible, where planning applications for waste facilities will be viewed favourably, alongside other industrial developments. The area allocations will provide the flexibility to allow Greater Manchester to adapt to changes in waste arisings over the plan period.</p> <p>The Waste Plan is based on the most up to date waste data available, which will continue to be updated throughout the plan period. Making predictions and estimates relating to the future changes of this data is necessary to develop a long term sustainable solution for waste arisings in Greater Manchester. Monitoring of waste arisings and industry trends will be critical in ensuring the long term accuracy of the Waste Plan.</p> <p>The proposed policies and allocations within the Waste Plan are based on achieving the highest recycling and recovery rates and therefore minimises the requirement for waste management solutions at the lower end of the waste hierarchy such as landfill. However, residual wastes will still be produced and</p>

Future Waste Management Requirements

Respondent	Representation	Commentary
GMWDA	<p>GMWDA agrees with the preferred policy as set out in 'Policy Direction 1' - that additional facilities should only be permitted where applicants can demonstrate that there is a proven need in line with the capacity gaps identified, or developers can provide sufficient evidence for a specific need for a facility, including any changes in waste arisings for the relevant waste stream, or a specific need in that location.</p> <p>The policy should also recognise that there may be a 'special case' to permit facilities which support the movement of waste up the hierarchy, over and above what can be achieved by existing facilities. Including this in the policy would support development of the industry, and allow new facilities to be brought forward to replace older facilities.</p>	<p>therefore provision of site allocations for future landfill provision is essential to ensuring the soundness of the Waste Plan.</p> <p>Noted. The suggested approach will be explored during the development of the next stage of the Waste Plan.</p>
MPG	<p>There are no open or enclosed Area allocations in Bolton and only a limited number of site allocations.</p>	<p>The Greater Manchester Waste Plan is a subregional document, aimed at addressing the future waste capacity requirements of all ten authorities. The site search process was designed to ensure that new facilities were in appropriate locations in accordance with a range of agreed criteria. It is important to remember that there are a large number of existing</p>

Future Waste Management Requirements

Respondent	Representation	Commentary
Sky Properties	<p>"Whilst we strongly support the identification of capacity gaps for waste recovery and the need for facilities immediately, the recovery targets are not ambitious enough in terms of diverting waste from landfill."</p> <p>Linking the overall capacity to an equivalent facility number may be misleading. Many new technologies like AD or gasification are modular and can be adapted to local districts at relatively small tonnages. For example, the gasification facility proposed for the Mitchell Shackleton site has an 80 0000 tonnes capacity which is ideal for the location. This type of facility at that tonnage could also be developed elsewhere within Greater Manchester.</p>	<p>operational waste facilities which will have an important role to play in continuing to deal with waste arisings throughout the plan period. Considered in this context, it is unlikely that the relatively low number of new sites allocated in Bolton will result in an inability to meet the identified capacity gap across the entire plan area.</p> <p>The link between the capacity gap and the number of facilities required is simply indicative of the range of waste facilities likely to be required based on average facility types and sizes to provide information on the potential number of facilities which may be needed in Greater Manchester over the plan period. If this is not clear, a statement to this effect will be explored for inclusion within the next stage of the Waste Plan.</p>
MEAS	<p>"Nature of response is support. However, Since the DPD will not be adopted till 2012, forecast requirements should be out to 2027 (at least). It is also unclear from the table in Policy Direction 1 how the considerable quantity of C&I wastes generated in Greater Manchester will be managed.</p>	<p>Noted. The PFI contract for Greater Manchester relies on the exportation of RDF to the regional facility at Ineos Chlor which has been agreed through GMWDA, the amount of waste exported there has been accounted for in developing the Needs Assessment</p>

Future Waste Management Requirements

Respondent	Representation	Commentary
	<p>The inference taken is that there is no capacity gap but this may not be the case and should be stated clearly if so. Also it is not clear whether the composting requirement is for green waste or reflects the introduction of kitchen/catering waste collections.</p> <p>We also note that the inference (though not stated clearly) is delivering a net self-sufficient waste management solution in the future. This is an important objective and a significant challenge but it does not appear clearly in the preceding objectives."</p> <p>The document does not include a clear statement indicating how the Waste DPD will deliver a net self-sufficient solution. Greater Manchester currently exports much of its MSW to landfill but other policy proposals appear to indicate this will be remedied during the next decade once current contracts expire. However the text above refers to other cases where waste or treatment residues will start or continue to be exported to other authorities. It is not clear how the Waste DPD is going to provide extra capacity to deal with this requirement. If it does not then the Waste DPD would not appear to deliver a net self-sufficient solution.</p>	<p>as has the development of facilities to deal with compostable and recyclable elements of MSW.</p> <p>The remaining capacity gap therefore concentrates on waste streams away from MSW where no or limited operations exist currently and for which there is an identified capacity gap.</p> <p>The Needs assessment will be undergoing a review to account for changes in waste arisings and capacity within the region, as well as to account for changes in the economy. The revised needs assessment will cover a 15 year period for the plan therefore will cover up to 2027.</p> <p>Site/areas to be allocated within the plan will have the potential to offer facilities which themselves could be regional in nature will help towards the goal of net self sufficiency. However these issues will be discussed more fully in the development of the Publication stage.</p>

Future Waste Management Requirements

Respondent	Representation	Commentary
Carter Jonas	Policy Direction 1 'Capacity Requirements' clearly sets out the anticipated requirements for waste management facilities during the plan period. It also allows for the flexibility to provide additional facilities should a proven need arise. The policy is acceptable.	Noted
The Environment Agency	The data which helps inform the capacity requirements is the best available at the time but as with much data can be misleading. These requirements need flexibility to ensure there is an allowance for both changes in waste production and a margin for error in the data. This will, as the policy direction states, allow for the justification of addition sites if required.	Noted. Flexibility has been built into the process through the proposed allocation of a combination of sites and areas coupled with a robust monitoring framework which will provide the flexibility to meet any future changes in demand for waste facilities across Greater Manchester.

Response

2.4 The response received showed general support for the inclusion of this policy, however it will be essential that the final capacity requirements presented in Policy Direction 1 are based on the most up to date information. An update of the needs assessment is planned in the early spring of 2010, and alongside the consideration of comments received here, will be used in the development of the next stage of the Waste Plan.

2 Future Waste Management Requirements

3 Site/Area Allocations

Site and Area Allocation: Built Waste Management Facilities

3.1 This section sets out the Questions made available for public comment, in relation to the allocation of sites and areas for built waste management facilities and residual waste disposal facilities, along with a summary of the responses received as part of the consultation and recommendations for dealing with them.

Question 4

3.2 Do you agree with the sites/areas allocated for provision of built waste management facilities? Do you agree with the approach to planning permission within these areas? Is there anything else we need to include in the policy?

Table 7 Responses to Question 4

Response Received	No. of Responses	Respondents
Agree with the sites/areas allocated	10	East Lancashire Railway, Viridor Waste Disposal, Mosaic Planning (on behalf of Stevenor Investments), Oldham MBC, Stockport MBC, Indigo Planning (on behalf of Seddon Developments), Peel Environmental, Enzygo Ltd (on behalf of The Industrial Trust), Sky Properties and Carter Jonas
Disagree with the sites/areas allocated	5	The Ramblers Association, Tameside MBC, Wigan MBC, The Emerson Group and 27 individuals
Concerns highlighted regarding sites	2	Salford City Council and the National Grid
Other	5	United Utilities, Cheshire West and Chester Council and The Greater Manchester Archaeology Unit, GMWDA and MEAS

3 Site/Area Allocations

3.3 The outcomes relating to specific sites allocations are set out in the tables below.

Table 8 BL9: Watersmeeting South C Triangle, Watersmeeting Road

Respondent	Representation	Commentary
The Emerson Group	<p>Orbit is a major land owner in Bolton. In this area Orbit own "The Valley" development adjacent to Site BL9 in the Waste DPD and object to the allocation of the site for a Mechanical Biological Treatment (MBT) facility or Anaerobic Digestion (AD) facility.</p> <p>The Emerson Group believe that the proposed use would under-utilise the potential of the site.</p> <p>They would like the site to be deleted as a waste treatment facility. If not the reference to it being suitable for an MBT deleted.</p>	<p>Information provided by The Emerson Group as part of the Stage Two Issues and Options: Built Facilities consultation was used to inform a reappraisal of the site through the Sustainability Appraisal. This process did not result in any change to the Sustainability Appraisal banding (the site remains a band C in recognition of the level of mitigation likely to be required to ensure a waste facility would not result in impacts on amenity and the environment). Mechanical Biological Treatment facilities are enclosed waste management facilities operated under strict environmental conditions, not incongruous with industrial land designations.</p> <p>The site will remain for further consideration as part of the next stage of the Waste Plan.</p>

Table 9 BU7: Daisyfield Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	<p>Desk based Assessment/historic research required as site of Hinds Colliery, Engine House and buildings by mid-19th century.</p>	<p>The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.</p>

Site/Area Allocations

Table 10 BU9: Former Drum Works, Park Road

Respondent	Representation	Commentary
East Lancashire Railway (ELR)	<p>ELR explain that site BU9 Former Drum Works is part operated by J.Ford and Briggs appears to handle general demolition materials and is extremely untidy.</p> <p>Any action to improve this part of the site would be welcomed by the ELR as the removal of an undoubted eyesore in what is other wise a green and pleasant lineside.</p>	Noted
The Greater Manchester Archaeology Unit	<p>Desk Based Assessment ⁽¹⁾ required as there is a Historic Environment Record ⁽²⁾ entry for Fernhill Foundry and Chemical Works just north of site, and large rectangular foundry building once occupied the site but disused by 1892.</p>	<p>The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful.</p>

- 1 Desk-based assessments are a quick and cost-effective way of establishing the potential archaeological resource of a proposed development area. Information from all available archaeological and historical records, old maps, aerial photographs and borehole logs is collected and synthesised to determine the potential impact of the proposed development. A desk-based assessment can be used to design a mitigation strategy, which can avoid costs and delays later in the project. Desk Based Assessments are not required as part of the preparation of the Waste DPD and should be dealt with through any planning application made on the allocated sites.
- 2 The Greater Manchester Archaeology Unit also make reference to the Historic Environment Record. Formerly known as the Sites and Monuments Record, the Historic Environment Record is a Geographical Information System (GIS) and linked database of more than 17,000 records compiled and maintained by the Greater Manchester Archaeological Unit (GMAU) at the University of Manchester on behalf of the ten Greater Manchester authorities. The Historic Environment Record is a comprehensive archive of sites of archaeological significance in the Greater Manchester and is a key tool for archaeological mitigation in the planning process.

3 Site/Area Allocations

Respondent	Representation	Commentary
		It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 11 OL3: Land off Higginshaw Lane

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Former late 19th century railway sidings for gasworks and no archaeological implications.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 12 OL4: Land off Mossdown Road

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Depending on nature of any ground works this site might have potential for palaeo-environmental data and prehistoric archaeology as it lies on the edge of the former Roylton Moss. Further archaeological analysis required.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Site/Area Allocations

Table 13 OL5: Land at Millstream Lane, Clayton Bridge

The Greater Manchester Archaeology Unit	Desk based Assessment and possible excavation required as the Historic Environment Record entry records Mill Houses settlement and a possible early mill.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.
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Table 14 SL9 Clifton Industrial Estate

Respondent	Representation	Commentary
Salford City Council	Whilst the city council does not wish to contest the in-principle suitability of this area to accommodate waste management facilities, it is important to highlight the site constraints in terms of highway access. As the Sustainability Appraisal acknowledges, a principal access to Clifton Industrial Estate from the A666 is via Queensway / Rake Lane, which runs directly through an established residential area. Alternatively, access to the A666 can be taken via Lumn's Lane. With regard to Heavy Goods Vehicle access, the city council's recently completed Employment Land Review (November 2008) notes that poor access will be a constraint to any future redevelopment of the site for employment purposes.	Comments noted. The next stage of the Waste Plan will include the detailed policies and information on each site allocation. The issues raised here will be incorporated into the development of such policy wording.

3 Site/Area Allocations

Table 15 SL11 Mitchell Shackleton, Green Lane

Respondent	Representation	Commentary
Salford City Council	<p>In summary, the city council has some concerns with regard to the constrained access arrangements via residential areas, and potential impacts on the adjacent residential communities and Site of Biological Interest. In light of these additional issues raised, we consider that there is a case for reappraising the site via Sustainability Appraisal. If having been through this reappraisal the site is still considered suitable for built waste management facilities, and should the site move forward as an allocation within the Joint Waste Plan, it will be important that any site allocation policy makes clear reference to the particular site constraints and associated mitigation measures which would need to be addressed by any site-specific proposal at the planning application stage.</p>	<p>Comments noted. The evidence base prepared to support the Waste Plan reveals these issues and also the overall suitability of the site for certain waste management uses in an area where the evidence base reveals the need for such facilities. The Sustainability Appraisal also recognised the issues raised in the representation, by classifying the site as 'Band B' and there is nothing to be gained in reappraising the site since the issues were taken into account in the original appraisal.</p>
Sky Properties Ltd	<p>The allocation of specific sites in the Waste Plan is strongly supported. It is vital to identify and protect sites that are suitable and deliverable for a range of waste uses where these can assist in meeting the Waste Plans aims and objectives.</p>	<p>The next stage of the Waste Plan will include a review of waste arising forecasts and the capacity of existing sites. The future of this site will be determined by this work and the representations received on other sites proposed by the waste plan. Should the site move forward as an allocation within the Joint Waste Plan, it is accepted that the information about the site accompanying the policy identifies the site constraints and the mitigation measures required to address them at the planning application stage.</p>
		<p>Noted.</p>

Site/Area Allocations

Respondent	Representation	Commentary
	<p>In particular Site SL 11 Mitchell Shackleton is assessed by the Preferred Options Report as being a particularly strong site. This is acknowledged and its allocation strongly supported for the reasons of its suitability, availability and flexibility.</p>	
<p>Individual Representations</p>	<p>Traffic and congestion caused by HGV's passing through residential areas, air pollution from emissions from traffic and from incineration processes, noise, odour from waste, detrimental visual impacts and general loss of amenity and conflict with Salford City Council's Core Strategy and the Bridgewater Corridor Masterplan.</p>	<p>Comments noted. The evidence base prepared to support the Waste Plan reveals these issues and also the overall suitability of the site for certain waste management uses in an area where the evidence base reveals the need for such facilities. The Sustainability Appraisal also recognised the issues raised in the representation, by classifying the site as 'Band B' and there is nothing to be gained in reappraising the site since the issues were taken into account in the original appraisal.</p> <p>The next stage of the Waste Plan will include a review of waste arising forecasts and the capacity of existing sites. The future of this site will be determined by this work and the representations received on other sites proposed by the waste plan. Should the site move forward as an allocation within the Joint Waste Plan, it is accepted that the information about the site accompanying the policy identifies the site constraints and the mitigation measures required to address them at the planning application stage.</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required focusing on historical research and building assessment as site of Patricroft Colliery to west and old brick works to east, by 1922 part of the site is occupied by Vulcan Engineering Works which later expands.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 16 SL12: Ashtons Field

Respondent	Representation	Commentary
Ramblers Association	The Ramblers Association wish SL12 Ashtons Field to be removed from the Allocation list as they believe that developing the site would be in conflict with Objective 7.	A contract between the landowner, the North West Development Agency, and the site operator sets out that part of the site should be made available for a waste management facility. The site will be subject to the usual strict permit and planning conditions and therefore any facility brought forward on this site will account for the environmental concerns of the adjacent landuses. In relation to Objective 7 the site has been judged to have limited value in respect of the sub regional natural environment, biodiversity, geodiversity, cultural and historic heritage and therefore no conflict will arise from the allocation of this site. The concerns of the Ramblers Association will be noted but SL12 Ashton's Field will not be removed from consideration on this basis alone.
Salford City Council	In summary, the city council wishes to raise concerns with regard to the suitability of this site for built waste management facilities, as such a use could have serious implications	Comments noted. The next stage of the Waste Plan will include the detailed policies and information on each site allocation. The issues raised here will be incorporated into the development of such policy wording.

Site/Area Allocations

Respondent	Representation	Commentary
	<p>for residential amenity given the close proximity of housing and the travelling showperson's site. Should this site move forward as a waste allocation within the Joint Waste Plan, any such site allocation policy should be heavily caveated so as to ensure that any such impacts are adequately mitigated, and will also need to reflect that no more than 20% of the developable area will come forward for waste management uses.</p>	
<p>Individual Representations</p>	<p>Traffic and congestion caused by HGV's passing through residential areas, air pollution from emissions from traffic and from incineration processes, noise, odour from waste, detrimental visual impacts and general loss of amenity.</p>	<p>It should be noted that these objections were received as part of Salford City Council's Core Strategy consultation and not directly to the Waste Plan.</p> <p>The objections make reference to the site being proposed as an Energy from Waste facility. The Waste Plan has simply outlined a number of possible waste management uses for the site. Any future proposals for a specific waste technology on the site would be subject to the usual planning application process including public consultation. The issues raised have been considered through the site assessment process, resulting in a Sustainability Appraisal 'Band B', which recognises the range of issues which would require mitigation at the planning application stage.</p> <p>The site will not be removed from further consideration at this time based on these considerations alone.</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
Indigo Planning on behalf of Seddon Developments	Policy Direction 2 should identify that waste and other employment use will be suitable for the site. (SL12 - Ashtons Field)	Following discussions with the developer of the site, it is clear that any waste management use will only form part of the development mix across the wider site. Whilst it is recognised that the site has potential for future waste development, the site allocation would be unsuitable as it would constrain wider redevelopment. Therefore it is intended that the wider area be included within an 'area' allocation at the next stage of the waste plan supported by appropriate policy wording.
The Greater Manchester Archaeology Unit	Colliery and old farm site lie beyond site boundary, tramways and colliery waste site, no archaeological work required.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 17 ST9 Land east of former Council Yard, Whitefield Road

Respondent	Representation	Commentary
Stockport MBC	Stockport Council supports in principle the allocation of the sites/areas within Stockport for the built waste management facilities set out in Policy Directions 2 and 3. It should be noted that planning permission has recently been granted for a material recycling facility and associated biomass fuelled power plant at site ST9 (in combination with an adjacent site to the north) (Development	Noted. Information on the planning permission recently received will be used to inform the development of policy within the Publication document.

Site/Area Allocations

Respondent	Representation	Commentary
	control application references DC041362 and DC042913). It is suggested, therefore, that waste facility type “F” (materials recovery facility) might also be considered appropriate at site ST9.	

Table 18 TA3a Shepley Industrial Estate North

Respondent	Representation	Commentary
Enzygo Ltd	Enzygo reiterate their support to the inclusion of the Site TA3a (Shepley Industrial Estate North) as a potential site for the full range of waste management development in the Waste Plan.	Noted.
The Greater Manchester Archaeology Unit	Historic Environment Record entry records Shepley water mill, pre 1700 and probably medieval in origin and its leat which runs down western edge of site and partly through it. This requires further research to pin point the mill site location – also opportunity to put something back into community through an information board on the history of Shepley Old Hall and Mill and an exploratory excavation.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

3 Site/Area Allocations

Table 19 TA6: Park Mill Site, Park Mill

Respondent	Representation	Commentary
Tameside MBC	<p>Tameside MBC wish to object to the inclusion of site TA6 Remainder of Park Mill Site as a potential allocation area for an Anaerobic Digestion plant. The reasons are as follows:</p> <ul style="list-style-type: none"> • Limited size and location of the site • Proximity to neighbouring houses • Condition and suitability of the proposed access road • Impact on the setting of the Park Road War Memorial • Tameside MBC requests that Site TA6 is removed from the Preferred Option allocation for the provision of a built waste management facility. 	<p>The concerns of the Authority are noted. The response received will be used to inform the final list of sites to be taken forward to publication and if found unsuitable this site will be removed.</p>
The Greater Manchester Archaeology Unit	<p>Historical Environment Record entry for Park Road Mill built in 1892. May be below-ground archaeological interest. Requires Desk based Assessment.</p>	<p>The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.</p>

Site/Area Allocations

Table 20 TR7: Vacant Land at Gate Street, off Ashton Street

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Gate Street, Dukinfield, Tameside – requires Desk Based Assessment to inform appropriate archaeological mitigation as this was the site of Gate Street settlement with mix of house types and other buildings.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 21 TR1: Partington Wharfside and TR14 Shell Site, Common Lane

Respondent	Representation	Commentary
National Grid	<p>The following sites identified as potential waste sites in the Preferred Options report are located within close proximity to National Grid’s high pressure underground gas transmission pipelines:</p> <ul style="list-style-type: none"> • TR14 Shell Site, Common Lane, Carrington • TR1 Partington Wharfside including former BP depot, Manchester Road, Partington <p>Should these be taken forward as waste sites, the operators should be made aware of the above issues.</p>	Noted

3 Site/Area Allocations

Table 22 TR4: G.Gervin and Sons, Thompson Road

Respondent	Representation	Commentary
Peel Environmental Ltd	In relation to the preferred allocated sites Peel questions the deliverability of the site referred to as G.Gervin and Sons, Thompson Road (TR4) on the basis that it is currently occupied and would not be available until 2016, when it is likely the current occupier will seek to renew the lease.	Comments noted. In relation to site TR4, landowners have been contacted and this information will be used to inform the inclusion of this site further.

Table 23 TR16: Carrington Vehicle Storage Site

Respondent	Representation	Commentary
Mosaic Planning (on behalf of Stevenor Investments)	<p>The siting of advanced and innovative waste treatment technologies on the site would exploit a unique situation, providing an economic driver to the benefit of the regeneration of Carrington and the nearby residential area of Partington. The site's ability to accommodate the clustering of waste treatment facilities and to facilitate co-location with other employment uses across the Carrington Strategic Location area offers significant benefits. The potential for Combined Heat and Power would also promote waste disposal higher up the waste hierarchy in accordance with established policy guidance</p>	Comments noted.
National Grid	The site is located adjacent to National Grid's 275kV Carrington substation. National Grid's substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Carrington	Comments noted. The landowners will be alerted to

Site/Area Allocations

Respondent	Representation	Commentary
	<p>substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Greater Manchester. The substation site is therefore "Operational Land" and while at present there are no plans to expand the substation, there may be a need to do so in the future.</p> <p>As such, we request that site TR16 is removed from the shortlist of potential waste sites given the need to safeguard land surrounding Carrington substation for essential utility development in the future.</p>	<p>this objection and this information will be used to inform the further inclusion of this site within the Waste Plan.</p>

Table 24 W7: Westleigh Lane, Leigh

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	<p>Desk based Assessment, building assessment and possible excavation required as two Historic Environment Record entries for this site, the medieval Parsonage Old Moat and Parsonage Farm.</p>	<p>The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.</p>

3 Site/Area Allocations

Table 25 W12: Templeton Road, Platt Bridge

Respondent	Representation	Commentary
Wigan MBC	Wigan MBC believe that the proposed site for built waste management facilities at Templeton Road, Platt Bridge is clearly inappropriate for such a use.	The concerns of the Authority are noted. The response received will be used to inform the final list of sites to be taken forward to publication and if found unsuitable this site will be removed.

Site/Area Allocations

3.4 The outcomes relating to specific area allocations are set out in the tables below.

Table 26 BU1: Dumers Lane EGA, Radcliffe

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required as 5 Historic Environment Record entries, farm site, historic textile/chemical industry, Dumers Lane settlement buildings.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 27 BU3: Pilsworth Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Pilsworth Industrial Estate, Bury – modern industrial estate, only archaeological interest is Cut Hole Farm site on Historic Environment Record. Once more details available, will need to carry out archaeological consultation to make sure below-ground remains not affected.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Site/Area Allocations

Table 28 BU4: Fernhill Industrial Area, Bury

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required as 4 Historic Environment Records here including historic textile industry, a colliery, brickworks and settlement site.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 29 BU8: Land at Pimhole, Bury

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, Pimhole mill and settlement entered on Historic Environment Record.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 30 MC1: Ardwick Yards, Manchester

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Historic Environment Record entries for a brick field and railway sheds. Only the latter has archaeological interest and would require	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is

Site/Area Allocations

Respondent	Representation	Commentary
	a historic building survey and possibly preservation.	extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 31 OL1: Land in the area between Higginshaw Lane and the Oldham to Shaw Railway/future Metrolink line

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required as site includes 3 Historic Environment Record entries, Royton Moss, a listed school, colliery, cotton mills, field systems.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 32 Heap Bridge Industrial Estate, Prettywood

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 3 Historic Environment Record entries, a woollen mill, paper mill and workers' housing.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Site/Area Allocations

Table 33 Mandale Park, Rochdale

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 3 Historic Environment Record entries, a former lake site, mills, two collieries and adjacent to Rochdale Castle.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 34 RD8: Rhodes Business Park

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 3 Historic Environment Record entries, early settlement, two printworks.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 35 SL2: Clifton Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 6 Historic Environment Record entries, includes Listed aqueduct, historic chloride battery works, colliery	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely

Site/Area Allocations

Respondent	Representation	Commentary
	railway, medieval and later hall, Magnesium Electron factory, field system, farm, bridge and canal.	useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 36 SL3: Cobden Street Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 7 Historic Environment Record entries including 2 listed buildings, pub, co-op, cotton mills and warehouses, flax mill, workers' housing.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 37 SL6: Oakhill Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 3 Historic Environment Record entries, field system, marsh land (palaeo-environmental potential) and mills.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Site/Area Allocations

Table 38 ST4: Green Lane Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 2 Historic Environment Record entries, Spout House, Hope Mill.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 39 ST6: Whitefield Road Industrial Estate

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	2 Historic Environment Record entries, for a brickworks and Whitecroft field (bleaching croft) – it is felt that no further archaeological works are required here.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 40 ST7: Bredbury Industrial Estate (North)

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 5 Historic Environment Record entries, collieries and tramways, farm cum pub, toll house.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will

Site/Area Allocations

Respondent	Representation	Commentary
		inform future potential waste developments at the planning application stage.

Table 41 ST8: Bredbury Industrial Estate (South)

Respondent	Representation	Commentary
The Greater Manchester Archaeology Unit	Desk Based Assessment required, 1 Historic Environment Record entry, early 19th century building, colliery tramway.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.

Table 42 TR17: Land at Trafford Park

The Greater Manchester Archaeology Unit	Three Historic Environment Records, sandstone quarry, Trafford Moss, house. Need to check that Trafford Old Hall site is not affected otherwise no especial archaeological interest. Consult Archaeology Unit once site location known.	The information supplied regarding archaeology and the historic environment at or surrounding sites/areas included within the Preferred Option Report is extremely useful. It will form part of the evidence base for individual sites and areas and will inform future potential waste developments at the planning application stage.
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3 Site/Area Allocations

3.5 General Comments received in relation to all sites and area allocations are set out in the tables below:

Table 43 General Site and Area Allocation Representations

Respondent	Representation	Commentary
Oldham MBC	<p>Oldham MBC supports the designation of the three preferred sites put forward for Oldham, i.e.:</p> <ul style="list-style-type: none"> o OL3 – Land off Higginshaw Lane (part of former Higginshaw Gas Works) o OL4 – Land at Mossdown Road o OL5 – Land at Millstream Lane, Clayton Bridge <p>The Council also supports the designation of the preferred ‘area’ i.e.:</p> <ul style="list-style-type: none"> o OL1 – Land in the area between Higginshaw Lane and the Oldham to Shaw railway line 	Noted.
Stockport MBC	<p>It is strongly recommended that a detailed transport assessment needs to be undertaken, testing the proposed Waste Plan (including sites and areas proposed to be allocated) through the Greater Manchester transport model and identifying mitigation measures that might be required. Such assessment would provide greater certainty in the</p>	<p>Initial transport modelling undertaken by the Greater Manchester Districts has included the type of areas where waste development will be permitted, however to ensure that all sites have</p>

Site/Area Allocations

Respondent	Representation	Commentary
	<p>deliverability of the Waste Plan as it would reduce the likelihood of objections (either to the allocation of sites or to future planning applications).</p> <p>In addition, there is some concern that the development of waste management facilities at allocated sites or within allocated areas does not impact negatively upon existing uses within the vicinity, in particular food preparation businesses.</p>	<p>been included in this study, the forthcoming review will include all sites/areas to be included within the Publication draft DPD.</p>
<p>Cheshire West and Chester Council</p>	<p>The Council agree with the approach to identifying both specific sites and broad area allocations is supported as this should provide the flexibility to meet the changing approaches to waste management and to meet the expectations of the market and waste contracts. We agree with the approach to planning permission in these areas.</p>	<p>Noted.</p>
<p>Peel Environmental</p>	<p>In relation to Ince Resource Recovery Park which is mentioned within the report in Chapter 3 Peel is willing to provide any further information that maybe required at this time, or in future stages of the Plan preparation.</p>	<p>Further information on Ince Marshes is welcomed and will be used to inform the development of the Publication draft DPD.</p>
<p>GMWDA</p>	<p>The approach taken to site allocation through assessment of both the spatial options (transport links, co-location, and growth) and the Sustainability Appraisal was robust.</p>	<p>Noted. The confusion relating to waste management types will be explored and rectified at the next stage of the Waste Plan. An update of the Needs Assessment in the next few</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
	<p>GMWDA agrees with allocating more specific sites than needed, but only bringing these forward to match the capacity gap, and designating areas suitable for development of multiple sites.</p> <p>Likewise, GMWDA agrees that planning permissions should only be permitted where proposals meet the requirements of policies within the Waste Plan, and relevant policy documents including the area specific management policies. In particular, GMWDA support that facilities should only be allowed that demonstrate the highest practicable level of recycling and recovery of materials.</p> <p>The list of waste management facility types that may be suitable for particular sites may cause some confusion. It is not clear why some sites that are labelled as suitable for Mechanical Heat Treatment are not suitable for Mechanical Biological Treatment when there's little difference between the facilities in terms of the environmental or social impacts.</p> <p>Also, the list of treatment facility types does not include any chemical treatment plants. The provision of such facilities is likely to become more important for the treatment of hazardous waste, and therefore the policy should allow for such developments should be brought forward on these sites.</p>	<p>months will provide clarity on the issue of hazardous waste amongst other aspects. This information will be used to develop the next stage of the Waste Plan.</p>

Site/Area Allocations

Respondent	Representation	Commentary
MEAS	<p>It is not clear how the suitability of sites for potential waste management uses has been determined. PPS10 makes clear that the Waste Plan should not restrict the range of uses, but there may be issues of logistics, aspect ration and site size, not to mention proximity to key sensitive receptors, which constraint the range of appropriate uses.</p> <p>To repeat a point made later in our response, it may also be prudent to make clear whether you expect safeguarding proposals to apply to all sites once allocated AND consented, in order to maximising future opportunities to intensify use (subject to mitigation controls, etc.) to make the best use of the available, limited supply of sites.</p> <p>We also note that there is no map showing all the sub-regional allocations. We have been advised that one will be essential at the submission stage.</p>	<p>Waste Management Types indicated for each site/area allocation have been guided by the Sustainability Appraisal the waste hierarchy and the ability of an allocated site to accommodate broad types of waste development. The waste management types are broad categories which are not technology specific, this gives the waste industry scope for innovation within agreed parameters.</p> <p>Clarity on the approach to safeguarding will be included within the next stage of the Waste Plan.</p> <p>The map showing all sub regional development will be included within the next stage of the Waste Plan.</p>
Carter Jonas	In general the sites/area allocations are acceptable.	Noted.
United Utilities	UU has already returned separate feedback on the proposed waste sites in relation to our underground apparatus.	The information supplied by United Utilities was gratefully recieved. This information will be used to update the information for each potential site/area allocation during the development of the next stage of the Waste Plan

Response

Site/Area Allocations

3.6 Where comments have been made in relation to specific sites/areas these will be taken into consideration during the development of the next stage of the Waste Plan. In particular it is envisaged that clear policy wording will be developed to support the final allocations, this wording will include reference to the particular constraints and limitations of each allocation as appropriate.

Site/Area Allocations

Site Allocation: Residual Waste Disposal Facilities

Question 5

3.7 Do you agree with the Preferred Option approach to inert residual waste set out above? Is there anything else we need to consider?

Table 44 Responses to Question 5

Response Received	No. Of Responses	Respondents
Agree with the approach to inert residual waste	8	Viridor Waste Management, The Ramblers Association, Stockport MBC, Cheshire West and Chester Council, Derbyshire County Council, GMWDA, Carter Jonas and the Environment Agency
Suggest additional information for the approach to inert residual waste	2	Government Office North West and MPG

3.8 The outcomes relating to the Preferred Option approach to inert residual waste are set out in the table below.

Table 45 Inert Residual Waste Representations

Respondent	Representation	Commentary
Viridor Waste Management	Viridor agree with the Preferred Option approach to inert residual waste	Noted
The Ramblers Association	The Ramblers Association agree with the Preferred Option approach to inert residual waste	Noted

3 Site/Area Allocations

Respondent	Representation	Commentary
Government Office North West (GONW)	GONW state that "it is indicated that there is considerable scope for managing inert residual waste without the need to allocate sites in the Waste Plan. It is also said, however, that should planning applications for inert residual waste disposal come forward they will be assessed against policies in the waste plan and other relevant policies. It would be helpful if this approach could be set out in a proposed policy."	The approach to inert waste and the criteria against which such planning applications will be judged will be developed for inclusion within the next stage of the Waste Plan.
Stockport MBC	Stockport Council agrees with the approach to inert residual waste set out in the Preferred Option document. It is suggested that the proposed approach might be more clearly set out in the final version of the Waste Plan so as to clearly denote it as a policy.	Noted. The approach to inert waste and the criteria against which such planning applications will be judged will be developed for inclusion within the next stage of the Waste Plan.
Cheshire West and Chester Council	The Council agree with the approach. Also, they state that 'the development management policies in the plan must ensure they provide the framework for determining applications for inert waste disposal.'	Noted. The approach to inert waste and the criteria against which such planning applications will be judged will be developed for inclusion within the next stage of the Waste Plan.
Derbyshire County Council	Derbyshire County Council agree with the Preferred Option approach to inert residual waste	Noted.
GMWDA	GMWDA agrees the preferred approach of not allocating inert sites in the plan, as there is potential to fill the capacity gap by other means, and sites should be easily brought forward, if required.	Noted.

Site/Area Allocations

Respondent	Representation	Commentary
MPG	<p>What is the total capacity for this site (Morleys Hall Quarry)? Without this information the Preferred Option Report cannot be assessed sensibly in relation to residual inert waste arising's and capacity needs. There are over 1 million tonnes of residual inert arisings per annum. Highly likely to be a shortfall in capacity.</p> <p>Yes – There is a need for allocation of both</p> <ol style="list-style-type: none"> 1) Existing or worked out quarries. 2) Quarries/ extension to quarries that are known to come forward during the Plan period. <p>We do not agree with the approach. It must be assumed that the Government target of only 50% of inert C&D/E waste arisings going to landfill by 2012 has been taken account of in your Capacity Requirements (Table 2). This table recognises that</p> <ol style="list-style-type: none"> (a) over 1 million tonnes of capacity per annum is required for this type of waste (b) some 6 additional facilities are required immediately to cover the anticipated capacity requirement to 2025 and probably more to 2026. How then can it say “...there is considerable scope for managing inert residual waste without the need to allocate specific sites in the Waste Plan”? 	<p>Information on the capacity of existing sites has been used to inform the development of a needs assessment for the waste plan. The document is due for an update shortly and any changes to capacity at sites will be included within this assessment. Current estimates for managing this waste show that large amounts of inert waste are being managed in line with the principles of the waste hierarchy and therefore less inert material is being disposed of to landfill. However further assessment of this position will also be undertaken as part of the update to the needs assessment.</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
MEAS	<p>It seems prudent to assume that landfill disposal of inert wastes cannot be eliminated entirely and to make provision for this.</p> <p>However, as noted in another comment, changes to the licensing of exempt sites and their inclusion in the landfill tax system within the next 18-24 months is likely to reduce their use and attractiveness. Equally, all landfill which relies on backfill of quarrying voids is at the mercy, to some extent, of the market for building materials and it is not evident how this has been taken into account. (We recognise the detail may be explained somewhere in the needs assessment report.)</p>	<p>Noted. The need for inert waste facilities has been considered through the existing needs assessment and this will be updated as part of the development of the Publication draft DPD.</p>
Carter Jonas	<p>The approach towards inert residual waste is sensible and allows for flexibility in the management of this waste type. The approach allows for the potential restoration of derelict sites which is in accordance with the principle of sustainability. It is not always possible to identify such sites in advance.</p>	<p>Noted.</p>
The Environment Agency	<p>Encouragement to reduce/reuse/recycle in the approach to inert residual waste is important. Cheap, easy options to 'dispose' of inert waste need to be discouraged and viewed more as expensive, difficult options that are only used as a 'last resort'.</p>	<p>Noted.</p>

Response

3.9 An update of the Needs Assessment is planned in the early spring of 2010 and alongside comments received here, will be used in the development of the next stage of the Waste Plan.

Question 6

3.10 Do you agree with the Preferred Option approach to hazardous residual waste? Is there anything else we need to consider?

Table 46 Responses to Question 6

Response Received	No. Of Responses	Respondents
Agree with the approach to hazardous residual waste	7	The Ramblers Association, Stockport MBC, Cheshire West and Cheshire Council, GMWDA, MEAS, Carter Jonas and the Environment Agency
Suggest additional information for the approach to hazardous residual waste	2	Government Office North West and MPG

3.11 The outcomes relating to the Preferred Option approach to hazardous residual waste are set out in the table below.

Table 47 Hazardous Residual Waste Representations

Respondent	Representation	Commentary
The Ramblers Association	The Ramblers Association agree with the Preferred Option approach to hazardous residual waste. They believe that we cannot continue to rely on sites outside Greater Manchester.	Noted. Due to the technical requirements of certain hazardous waste disposal facilities sites will not be brought forward in Greater Manchester. Hazardous waste disposal facilities are recognised as regionally important sites. Although export is a less sustainable option, there may be no alternative. The final policy for

Site/Area Allocations

3 Site/Area Allocations

Respondent	Representation	Commentary
Government Office North West (GONW)	GONW state that "the plan needs to be clearer about how hazardous waste will be dealt with and failure to do this will risk the plan being found unsound. A policy approach therefore needs to be set out which either identifies sites within Greater Manchester or suitable cross-boundary solutions. The reliance on a very early review is not appropriate and could put at risk the soundness of the plan."	hazardous waste disposal will be set out within the next stage of the Waste Plan. Noted. It is intended that the current approach to hazardous waste disposal will be updated in light of the comments received and the final policy for hazardous waste disposal will be set out within the next stage of the Waste Plan.
Stockport MBC	Stockport Council agrees with the approach to hazardous residual waste set out in the Preferred Option document. It is suggested that the proposed approach might be more clearly set out in the final version of the Waste Plan so as to clearly denote it as a policy.	Noted. The final policy for hazardous waste disposal will be set out within the next stage of the Waste Plan.
Cheshire West and Chester Council	The Council agrees with the approach as they state that 'this will allow for the early review of the situation which can be informed by discussion at the regional level to secure a long term solution for the disposal of hazardous waste.'	Noted.
GMWDA	GMWDA agrees with the preferred option to rely on existing hazardous waste disposal capacity, available until 2018, reviewing the situation by 2013. Since the 'call for sites' has not resulted in any new sites being brought forward, and the exploration of land use information has not resulted in any potential hazardous waste sites being	Noted. It is intended that the current approach to hazardous waste disposal will be updated in light of the comments received and the final policy for hazardous waste disposal will be set out within the next stage of the Waste Plan. However, all possibilities to locate hazardous waste

Site/Area Allocations

Respondent	Representation	Commentary
MPG	<p>identified, then it looks increasingly likely that Greater Manchester may need to export such wastes out of the region in the long-term.</p> <p>Although this does not help to develop the waste sector in Greater Manchester, and transportation negatively impacts on the Sustainability Appraisal, there is still a need to actively pursue this option alongside further exploration of the land use options within Greater Manchester.</p> <p>GMWDA would therefore advocate a policy on the development of Regional hazardous waste treatment facilities.</p> <p>The plan must consider the period of recognised shortfall between 2018 and 2026. If this is not done then the Plan will be flawed and will not pass the test of soundness. Whilst it is recognised that allocating suitable sites or areas for hazardous waste disposal/treatment will be fraught with controversy. GMGU have a duty to carry this exercise out.</p>	<p>disposal facilities have been exhausted in Greater Manchester and this will not be revisited.</p> <p>The search for all types of landfill has been carried out through an extensive and robust site search and appraisal process. In summary, the geological and hydrogeological structures in Greater Manchester coupled with the extent of the urban area are constraints which cannot be overcome when siting hazardous waste disposal sites, therefore no hazardous waste disposal sites have been identified. Details of the full process can be found within the Issues and Options: Residual Waste Disposal Report.</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
MEAS	<p>The preferred option appears to be consistent with the Regional Spatial Strategy in that all authorities in the region will rely on hazardous waste management facilities that have at least regional if not national catchments, so providing a mass-balance explanation of the need for such facilities cannot be exact.</p> <p>However we note that the current policy explanation is contradictory. Paragraph 4.42 dismisses the discounted option (rely on non-Manchester sites) on sustainability grounds, but the implication of the preferred option is a continued reliance (to a considerable degree) on those external sites until 2018. This appears to be confirmed in paragraphs 4.37, 4.38 and</p>	<p>It is recognised that such sites are regionally and nationally important, therefore such facilities should be identified at this scale.</p> <p>It is recognised that the approach to hazardous waste within the Preferred Options Report may risk unsoundness, therefore this issue will be further explored and resolved in advance of the next stage of the Waste Plan.</p>
		<p>It is recognised that hazardous waste disposal sites are regionally and nationally important, therefore such facilities should be identified at this scale.</p> <p>It is intended that the current approach to hazardous waste disposal will be updated in light of the comments received and the final policy for hazardous waste disposal will be set out within the next stage of the Waste Plan.</p>

Site/Area Allocations

Respondent	Representation	Commentary
	<p>4.39 which identify a lack of current available capacity in Greater Manchester and the existence of two major disposal facilities in Cheshire and Lancashire.</p> <p>The Waste Plan also proposes to defer action to delay dealing with longer-term management needs until 2018 and wonder whether this will be acceptable to a Planning Inspector as possible actions are not proposed in the current plan.</p>	
Carter Jonas	<p>The approach towards hazardous residual waste is a practical response to the circumstances for the foreseeable future. A review of this issue during the plan period allows for a quicker response to the conditions at that time and allows the issue to be plan led.</p>	<p>Noted. It is intended that the current approach to hazardous waste disposal will be updated in light of the comments recieved and the final policy for hazardous waste disposal will be set out within the next stage of the Waste Plan.</p>
The Environment Agency	<p>Capacity for residual hazardous waste disposal is important due to the potential risks to the environment from the unregulated disposal of such wastes. After reduction, reuse and recycling, accessible safe disposal options will be required to ensure any such wastes is managed correctly.</p>	<p>Noted.</p>

Response

3.12 All opportunities for the location of hazardous waste disposal sites in Greater Manchester have been exhausted, further site searches will not be undertaken, although any additional sites brought forward by landowners will be considered in line with the adopted methodology. It is intended that the current approach to hazardous waste disposal will be clarified in light of the comments recieved and the final policy for hazardous waste disposal will be set out within the next stage of the Waste Plan.

3 Site/Area Allocations

Question 7

3.13 Do you agree with the Preferred Option approach to residual waste disposal? Is there anything else we need to consider?

Table 48 Response to Question 7

Response Received	No. Of Responses	Respondents
Agree with the approach to residual waste disposal	8	Viridor Waste Disposal, The Ramblers Association, Stockport MBC, Peel Environmental, GMWDA, MEAS, Carter Jonas and the Environment Agency
Disagree with the approach to residual waste disposal	1	MPG
Recommended improvements	1	Cheshire West and Chester Council
Other	1	The Greater Manchester Archaeological Unit

Site/Area Allocations

3.14 The outcomes relating to the Preferred Option approach to residual waste are set out in the table below.

Table 49 Residual Waste Representations

Respondent	Representation	Commentary
Viridor Waste Disposal	Viridor agree with the Preferred Option approach to residual waste disposal	Noted
The Ramblers Association	The Ramblers Association broadly agree with the Preferred Option approach to residual waste disposal but they would like to see all possible sites outside the Green Belt explored before developing on Green Belt land.	<p>National planning policy makes in clear that siting waste facilities within the greenbelt, although not desirable, should not be discounted.</p> <p>Due to the constraints associated with identifying residual waste disposal sites in Greater Manchester it is not appropriate for the Waste Plan to rule out sites located within the greenbelt. This is an issue to be dealt with at the planning application stage of such sites.</p> <p>In relation to sites/areas suitable for built waste facilities, the adopted methodology has screened</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
Stockport MBC	Stockport Council agrees with the approach to non-hazardous residual waste set out in the Preferred Option document. It is suggested that the proposed approach might be more clearly set out in the final version of the Waste Plan so as to clearly denote it as a policy.	out those located in the greenbelt due to the relative abundance of suitable land outside the greenbelt.
Cheshire West and Chester Council	Whilst the site search exercise did not identify any suitable new sites this approach would make it difficult for new sites to be developed in the event that they came forward. Given the limited options for Greater Manchester to provide non hazardous residual waste disposal the policy approach needs to be flexible.	The approach to residual waste disposal will be clearly set out within the next stage of the Waste Plan. Given that disposal of waste to landfill is the least sustainable option, at the bottom of the waste hierarchy, the Waste Plan will only allocate sites where supported by the Needs Assessment or other relevant robust data. The approach to residual waste disposal will be clearly set out within the next stage of the Waste Plan.
The Greater Manchester Archaeological Unit	Pilsworth North Quarry, Bury – no archaeological implication if confined to existing landfill/quarry site, but archaeological mitigation required if proposals affect new ground including the pre-1700 farmstead.	Noted.

Site/Area Allocations

Respondent	Representation	Commentary
	<p>Pilsforth South Quarry, Bury – no archaeological implications as archaeological mitigation scheme undertaken previously ahead of quarrying.</p> <p>Whitehead landfill, Wigan/Salford - no archaeological implications.</p>	
Peel Environmental	<p>Peel is in general support of the approach. However Peel disagrees with the comments made in relation to the Vicar’s Hall Lane site within Table 13, as it is Peel’s position that the site is suitable for waste disposal, whether the waste be inert waste or non hazardous.</p> <p>Consideration should also be given to the use of former quarries for other types of waste management uses, particularly if these are complimentary to the restoration of the site.</p>	<p>Evidence supplied by Viridor Waste Management supports the earlier decision to remove Vicars Hall Lane from further consideration. This information refers to the range of geotechnical, ecological, and access issues which would deter them from pursuing a the development of a landfill site at this location. Therefore this site will not be considered further.</p>
GMWDA	<p>GMWDA supports the preferred option approach. Given the limited options in Greater Manchester to allocate suitable sites of the size required due to its extensive urban area, then it is acceptable to rely on existing disposal capacity, and seek to allocate extensions to existing sites. Given the difficulties in finding sufficient capacity GMWDA would advocate the development of Regional capacity.</p>	<p>Noted.</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
MPG	<p>No we do not agree with the Preferred Option approach to residual waste disposal and we think that an “open” call for sites throughout the plan period should be developed.</p>	<p>Given the need to demonstrate that the policies and allocations within the Waste Plan meet the identified capacity gap, the suggested approach would risk unsoundness and therefore it is not proposed to take it forward to the next stage of the Waste Plan</p>
MEAS	<p>Exploring the potential for expansion of existing consented landfills is logical and would potentially contribute the least social and environmental impacts. However, paragraph 4.49 states a study has identified few options in Greater Manchester for residual waste disposal. This raises the concern about whether the preferred option is deliverable.</p> <p>Given that the landfill permissions expire towards the end of the next decade and the preferred option is to firstly continue to rely upon them, it is not evident whether the three existing landfill sites identified in Greater Manchester will yield enough capacity to meet the sub-regions waste disposal needs. We assume this is the case but again feel there needs to be a clear statement to this effect.</p> <p>However if they do not then presumably non-hazardous waste will be exported out of the sub-region; an option previously discounted as unsustainable for hazardous waste.</p>	<p>Noted. Capacity is being explored at the three existing landfills in Greater Manchester, where the operator is confident that additional capacity could be met through extension to the current permissions.</p>

Site/Area Allocations

Respondent	Representation	Commentary
Carter Jonas	The approach to residual waste disposal is acceptable in that it prioritises extensions to existing sites over new sites if additional capacity is required.	Noted.
The Environment Agency	The approach to residual waste disposal is appropriate given the move away from landfill. The use of potential extensions gives flexibility and a continued search for potential new sites would enable provision of a regulatory 'safety net'.	Noted. Additional searches for new sites to meet the capacity gap are unlikely to be necessary given the likelihood of capacity through extensions at existing sites.

Response

3.15 The approach to residual waste disposal will be clarified in light of the comments received in line with the commentary above and the final policy will be set out within the next stage of the Waste Plan.

Site/Area Allocations

Site Allocation: Non Hazardous Residual Waste Disposal

Question 8

3.16 Do you agree with the Preferred Option approach set out in Policy Direction 4 'Non hazardous residual waste disposal' ? Is there anything else we need to include in the policy?

Table 50 Response to Question 8

Response Received	No. Of Responses	Respondents
Agree with the approach for non-hazardous residual waste disposal	6	Viridor Waste Disposal, Stockport MBC, GMWDA, MEAS, Carter Jonas and the Environment Agency
Disagree with the approach for non-hazardous residual waste disposal	2	The Ramblers Association and Wigan MBC
Recommended improvements	2	Cheshire West and Chester Council and MEAS
Other	1	Natural England

3.17 The outcomes relating to the Preferred Option approach set out in Policy Direction 4 'Non hazardous residual waste disposal' are set out in the table below.

Table 51 Policy Direction 4 'Non hazardous residual waste disposal' Representations

Respondent	Representation	Commentary
Viridor Waste Disposal	Viridor believe that Pilsworth North and South and Whitehead are to be welcomed in meeting a recognised	The classification of Whitehead as a "band C" reflects the range and significance of the

Site/Area Allocations

Respondent	Representation	Commentary
	<p>and demonstrable need for continued residual waste disposal in the plan area and period. They believe that Whitehead should be re-classified as "Band B".</p>	<p>impacts which require mitigation should a landfill development come forward at this location. Any information which can be submitted to warrant the reclassification of this site will be considered. However, it should be recognised that the banding classification is only one of many considerations used to determine which site will go forward for final allocation.</p>
<p>The Ramblers Association</p>	<p>The Ramblers Association would like to see site W12 Whitehead Landfill removed from the list due to wildlife interest.</p>	<p>The wildlife interest at this location has been considered in preparing the Sustainability Appraisal, contributing to the current "band C" classification. This highlights the range of issues which must be mitigated prior to the granting of any planning permission, but does not warrant removal of the site from the Waste Plan process.</p>
<p>Wigan MBC</p>	<p>Wigan MBC objects to the Whitehead Landfill site as they believe further information on need and alternative sites and approaches is needed before the Council could properly consider its position on a proposal which would have a detrimental impact on the Green Belt.</p>	<p>In relation to the need for landfill facilities in Greater Manchester robust evidence from the Needs Assessment 2007 indicates that at the end of the plan period there will be a shortfall in landfill capacity for non hazardous waste in the order of 800,000 tonnes per year. In spring 2009 Issues and Options: Residual Waste Disposal was issued for consultation, this set out the methodology used to search for suitable</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
		<p>sites for the disposal of this waste. This report set out the range of constraints relating to the identification of suitable landfill sites in Greater Manchester including the presence of the major aquifer, the extent of the urban area and the nature of the geological setting.</p> <p>The evidence behind the need for all types of waste facilities and methodology for identifying suitable locations has been agreed by the Joint Committee at every stage.</p> <p>The results of this sites search revealed only three viable options for such facilities in Greater Manchester:</p> <ul style="list-style-type: none"> ● Pilsworth North and South landfills in Bury and ● Whitehead landfill in Wigan/Salford. <p>The only alternative option for the disposal of waste arising from Greater Manchester outside of these sites is to transport waste outside of the sub region for landfilling at sites in neighbouring authorities. This is unacceptable in terms of national waste planning guidance,</p>

Site/Area Allocations

Respondent	Representation	Commentary
		<p>especially where viable sites have been identified through a robust site search process and therefore this option cannot be explored.</p> <p>The allocation of the three residual waste disposal sites included within the Preferred Option Report is the only viable option available to Greater Manchester. Failing to identify a strategy for the disposal of residual non hazardous waste will result in the Waste Plan being found unsound, which has serious financial implications for all ten Greater Manchester Authorities.</p> <p>In conclusion, the best available evidence is very clear about the requirement for such disposal capacity in Greater Manchester. In addition, despite the objections to the inclusion of the Whitehead site within the Waste Plan, the extensive evidence base shows that there are no alternative options for the location of this disposal facility in Greater Manchester. If Wigan Council has additional information which refutes the current evidence regarding the need or alternative locations for this facility this should be provided as soon as possible.</p>

Site/Area Allocations

Respondent	Representation	Commentary
Stockport MBC	<p>Stockport Council supports the preferred approach to the disposal of residual non-hazardous waste. To ensure clarity and certainty in delivering the Policy Direction it is suggested that the opening paragraph be amended to read as follows:</p> <p>Applications for non-hazardous residual waste disposal on the sites allocated in the Waste Plan and within the plan provision totals set out in Future Waste Management Requirements, will only be permitted where <i>it is demonstrated by the applicant that:</i></p>	<p>Noted. The final policy will be revised in the development of the next stage of the Waste Plan, inclusion of the suggested wording will be explored.</p>
Salford City Council	<p>A key impact with regard to the suitability of the Whitehead Landfill Site for vertical extension through tipping would be the impact on the openness of the Green Belt in this location, as the proposal would involve further land-raise. Planning Policy Guidance 2: Green Belts states that there is a general presumption against inappropriate development within the Green Belt except in very special circumstances. It also states that development within the Green Belt is inappropriate unless it maintains openness and does not conflict with the purposes of including land within it. A visual impact assessment would be required to understand whether further land-raise in this location would have a significant impact on the openness of the Green Belt. Without an understanding of the proposed level of land-raise and an associated visual impact assessment it</p>	<p>In relation to the Green Belt, Salford City Council have recognised that an appropriate policy would need to accompany the allocation of this site within the Waste Plan. Such a policy will be explored and where necessary included at the next stage of the Waste Plan.</p> <p>The need to protect the Bridgewater Canal from any potential impacts from the development of this site is recognised. As far as possible this issue will be clarified before the site is included within the waste plan, and an appropriate site allocation policy will be developed in recognition of the standing of the Bridgewater Canal and Corridor.</p>

Site/Area Allocations

Respondent	Representation	Commentary
	<p>is not possible to assess the potential impact on openness. Were this site to move forward as an allocation within the Joint Waste Plan, any such site allocation policy would need to make clear that whilst the principle of additional residual waste disposal in this location may be acceptable, the acceptability of any future application would be contingent on its visual impact on the openness of the Green Belt.</p> <p>The city council also wishes to highlight the need to mitigate any potential impact on the adjacent Bridgewater Canal which lies to the north of the site. The Bridgewater Canal is an identified Site of Biological Importance, reflecting the priority habitat of the canal corridor and is afforded protection in this regard via Policy EN8 of the City of Salford Unitary Development Plan (2006). It would be important therefore that any further residual waste disposal on the Whitehead site does not unacceptably impact on this Site of Biological Importance in terms of its nature conservation value. The Bridgewater Canal Corridor also has significant heritage and recreation value. Policy ST4 of the Unitary Development Plan identifies the Bridgewater Canal Corridor as a key tourism area, and the canal also forms part of the Countryside Access Network where Policy R5 of the Unitary Development Plan provides for the protection and improvement of the network routes as a recreation resource. Further to this, the adopted Salford West Strategic Regeneration Framework and Action Plan highlights the</p>	

3 Site/Area Allocations

Respondent	Representation	Commentary
	<p>important role the city's leisure, heritage and environmental assets play in improving the quality of life of residents as well as attracting new residents and visitors. The Salford West Partnership Board have prioritised the regeneration of the Bridgewater Canal Corridor within its 2008/11 action plan and a consultant team are currently leading on the preparation of a Masterplan for the canal corridor to maximise its recreation potential. We would want to ensure as far as practicable that any further residual waste disposal on this site did not compromise the recreation opportunities and the setting of the Bridgewater Canal. Should this site move forward as a waste allocation within the Joint Waste Plan, any such site allocation policy should therefore require mitigation measures to protect the nature and recreation value of the adjacent Bridgewater Canal corridor.</p>	
Cheshire West and Chester Council	<p>It would be helpful if the policy provided an indication in table 6 of how much capacity would be provided by the extensions to the three existing sites listed. As currently set out it is not clear how policy direction 4 will ensure that capacity requirements for non hazardous residual waste disposal set out in table 2 of policy direction 1 'capacity requirements' will be met.</p> <p>The policy may also want to include a requirement for all proposals to make provision for energy recovery from landfill gas.</p>	<p>Agreed. Once the details of the proposed residual waste disposal sites have been agreed as formal allocations, the ability of these site allocations to meet the identified capacity gap will be included at the next stage of the Waste Plan.</p>

Site/Area Allocations

Respondent	Representation	Commentary
<p>Natural England</p>	<p>Natural England believe the extension of the Whitehead landfill would be within 1.5km of the Astley Moss SSSI/SAC, therefore possible effects on this site such as potential impacts on the hydrological regime would have to be examined within the Habitats Regulations Assessment.</p>	<p>A HRA assessment on the proposals at Whitehead is being pursued at present; the results will influence the inclusion of the site at the next stage of the Waste Plan.</p>
<p>GMWDA</p>	<p>It is right to only permit new landfill to match the expected quantity of waste arisings within the plan provisions allowing for the highest level of recycling and recovery of materials practicable.</p> <p>Also supported is the necessity to meet the policy requirements within the Waste Plan, other policy documents and relevant site specific development management policies.</p> <p>However, it should not be necessary to prove that new landfill / landraise should have fewer social and environmental impacts than extending existing non-hazardous waste disposal. As long as the site meets the policy requirements, and is both environmentally and socially acceptable, there should not be a need to prove that its performance is better than existing sites, as this puts an undue limitation on the development of facilities.</p>	<p>Noted. To clarify, the process of the site search an assessment has resulted in evaluation of sites and areas, where those judged to be the least sustainable or those with more social, economic or environmental issues have been removed from the process. The sites which remain have been categorised based on their sustainability and those with a greater number of impacts will be required to provide significant mitigation based on these impacts. This process of site categorisation should be applied across the board, even to sites which come forward outside of the allocations. Therefore a policy will be developed to include a requirement for new sites to be judged against the same criteria as the allocated sites.</p>

3 Site/Area Allocations

Respondent	Representation	Commentary
MEAS	<p>Given the lack of potential new opportunities, extension to existing landfill operations has been logically prioritised on the premise that it would yield fewer social and environmental impacts and would be more deliverable and sustainable.</p> <p>Bullet point 3 of the policy direction notes compliance is required with Waste Plan Objective 2 regarding recycling and recovery of materials. This wording suggests facilities other than landfill (eg. EfW) may be considered. The supporting text does not discuss this option and the coherence of this area of policy would be improved if it were to be stated clearly in the policy direction and accompanying text as an alternative / additional means of non-hazardous residual waste disposal.</p>	<p>Agreed. The suggestion to clarify the supporting text and the policy will be explored in development of the next stage of the Waste Plan.</p>
Carter Jonas	<p>Policy Direction 4 is an acceptable approach to the allocation of sites. It provides certainty for interested parties and developers yet allows sufficient flexibility to allow for new waste management sites if required.</p> <p>The allocations for Pilsworth (North & South) are strongly supported. The extension of the existing site is preferred to the allocation of greenfield sites. The existing facility at Pilsworth offers excellent support infrastructure; good existing communications and limited impacts on sensitive receptors</p>	<p>Noted.</p>

Site/Area Allocations

Respondent	Representation	Commentary
The Environment Agency	Policy direction 4 is clear and it is important that this makes provision for future requirements but doesn't detract from the need for increase diversion of both recyclable and residual waste from landfill. The sites allocated are currently within the regulatory regime and are potentially more deliverable than new sites.	Noted.

Response

3.18 The supporting text and the policy approach to non hazardous residual waste disposal sites will be clarified in line with the commentary above and the final policy will be set out within the next stage of the Waste Plan.

3 Site/Area Allocations

Additional Sites

4 Additional Sites

Additional Sites

4.1 During consultation on Issues and Option: Additional Sites in summer 2009, a landowner brought forward another additional site for consideration through the waste plan process- Rugby Mill/Ram Mill, Oldham. In accordance with the adopted procedures, the site has been subjected to site assessment including site visit and Sustainability Appraisal. The site was included within the Preferred Option Report for initial public consultation and not as part of the preferred sites considered in the previous section of this report.

4.2 Set out below are the results of the consultation process, including information on the range of respondents and the details of their representation in relation to this site. The final response can be found below the tables, and sets out how the site will be dealt with in advance of the next stage of the Waste Plan.

Question 9

4.3 Do you think that the Rugby Mill/Ram Mill site, identified as potentially suitable for waste management facilities, is acceptable? (Please give details)

Table 52 Response to Question 9

Response Received	No. Of Responses	Respondents
Object to the Rugby Mill/Ram Mill site	3	An individual, Oldham MBC, Chadderton District Partnership
Support the Rugby Mill/Ram Mill site	2	Mosaic Planning (on behalf of Stevenor Investments), Stockport MBC
Other information	3	United Utilities Water, GMWDA and the Environment Agency

4.4 The representations relating to the Rugby Mill/Ram Mill site are set out in the table below.

Table 53 Rugby Mill/Ram Mill Representations

Respondent	Representation
Individual	The individual objects to the site Rugby Mill/Ram Mill site on the grounds of close proximity to Kingfisher Special School and

4 Additional Sites

Respondent	Representation
	several residential housing areas, harm to the local environment and increased traffic congestion.
Oldham MBC	Oldham MBC object to the site on the Rugby Mill/Ram Mill site on the grounds of close proximity to Kingfisher Special School and several residential housing areas, serious detriment to amenity of local residents and increased traffic congestion, especially at the junction with the M60.
Chadderton District Partnership	Chadderton District Partnership object to the site on the Rugby Mill/Ram Mill site on the grounds of close proximity to Kingfisher Special School and several residential housing areas, serious detriment to amenity of local residents and increased traffic congestion, especially at the junction with the M60. Chadderton District Partnership request that the Joint Committee agree that the site should not be taken forward for further consideration.
United Utilities Water (UUW)	<p>You should be aware of the following features on the proposed waste site.</p> <p>A. UUW has a Right Of Way through the site to enable access to Oldham Wastewater Treatment Works.</p> <p>B. A 1,350mm diameter; 5.65m deep public sewer passes through the South West of the site. We will not permit any building or changes in ground level within 6.5m of the centre line of this pipe.</p>

Additional Sites

Respondent	Representation
	<p>C, Whilst it is not a UUW asset, we are aware that a culverted watercourse passes under the middle of your proposed site</p> <p>UUW has no other comment on the prescribed questions from this consultation.</p>
Mosaic Planning (on behalf of Stevenor Investments)	The facilities deemed appropriate for the site will help to promote sustainable waste management through the waste hierarchy and ensure that waste is processed as close to its origin as practicable.
Stockport MBC	Stockport Council considers that, so as to assist in ensuring that adequate sites are available to meet Greater Manchester’s future waste management needs, any site that the sustainability appraisal concludes is appropriate for waste development should be allocated in the Waste Plan unless other factors are shown to outweigh the benefits of its allocation.
GMWDA	<p>The close proximity of housing and, in particular the school, would raise doubts about the suitability of the site. This is recognised in the development constraints which limits the site to enclosed facilities and assumes that any impacts on nearby receptors will be mitigated.</p> <p>Nonetheless, consideration should be given to the mitigation of any potential social impacts on the school, which has been overlooked in the waste development constraints.</p>

4 Additional Sites

Respondent	Representation
The Environment Agency	It is likely that any waste facility developed on this site would require an appropriate application for an environmental permit or appropriate waste exemption. The proposed site is in close proximity to Rochdale Canal SAC, a European Habitats Directive site, and any proposals here would require consultation with Natural England, to ensure any proposals do not detrimentally impact on this international wildlife site.

Response

4.5 In light of the comments received in relation to transport, the proximity to sensitive receptors and also the access and right of way upheld by United Utilities it is proposed that Rugby/Ram Mill will be subject to reassessment through the Sustainability Appraisal process. If the issues raised result in a reappraisal of the site as a 'band D' the site will be removed from further consideration. This process will be carried out in consultation with the landowner and the relevant organisations submitting objections at this stage because a decision must be made in relation to this site in advance of the publication stage.

5 Development Management

Development Management

5.1 The following section sets out the Questions made available for public comment, in relation to the preferred development management policy approaches for the Waste Plan, along with a summary of the responses received as part of the consultation and recommendations for dealing with them.

Question 10

5.2 Do you agree with the Preferred Option approach set out in Policy Direction 5 'Requirement for Combined Heat and Power'? Is there anything else we need to include in the policy?

Table 54 Response to Question 10

Response Received	No of responses	Respondents
Agree with the Preferred Option approach for Combined Heat and Power	9	Viridor Waste Disposal, The Ramblers Association, Stockport MBC, Cheshire West and Chester Council, Natural England, MPG, Sky Properties, Carter Jonas and the Environment Agency
Additional inclusion suggested	3	The Ramblers Association, GMWDA and Carter Jonas

5.3 The outcomes relating to Policy Direction 5 'Requirement for Combined Heat and Power' are set out in the table below.

Development Management

5 Development Management

Table 55 Policy Direction 5 'Requirement for Combined Heat and Power' Representations

Respondent	Representation	Commentary
Viridor Waste Disposal	Viridor Waste Disposal agree with the Preferred Option approach set out in Policy Direction 5 'Requirement for Combined Heat and Power'	Noted.
The Ramblers Association	The Ramblers Association support this policy and they <i>'would like to see a paragraph added to the effect that waste management facilities that have the potential to generate combined heat and/or power should include a CHP facility to use the heat produced to heat and/or power nearby buildings.'</i>	The Waste Plan recognises the benefit of combined heat and power generation from thermal treatment facilities. Appropriate policy wording will be developed to appear within the next stage of the Waste Plan.
Stockport MBC	Stockport Council strongly supports the approach set out in Policy Direction 5 relating to ensuring that reasonable opportunities to generate heat and/or power are maximised through waste management developments. This approach is very much in line with the overarching approach for all development set out the emerging Stockport Core Strategy.	Noted.
Cheshire West and Chester Council	The Council agrees with the approach to Combined Heat and Power.	Noted.
Natural England	Natural England welcome the requirement to demonstrate that all reasonable opportunities to generate heat and/or power have been maximised. They also welcome the recognition within paragraph 6.13 of the under-utilisation of the waste resource for generating renewable energy.	Noted.

Development Management

Respondent	Representation	Commentary
GMWDA	The policy statement could be strengthened by making it a requirement for large thermal treatment facilities to use combined heat and power (rather than demonstrating that all opportunities have been maximised), or convert the energy into fuels. Essentially, every large facility that is granted permission which uses only power is an opportunity that has been lost for many years. It is very important to maximise opportunities for heat as that is where the greatest efficiency gains can be made.	The Waste Plan recognises the benefit of combined heat and power generation from thermal treatment facilities. Appropriate policy wording will be developed to appear within the next stage of the Waste Plan.
MPG	Yes we do agree with the Preferred Option approach set out in Policy Direction 5 although the word "only" is superfluous. Also the term "...linked to opportunities identified within the Local Development Framework" is too broad and difficult to cross-reference.	Amend wording to remove 'only' from the policy. Provide more detail in the supporting text regarding the linking of opportunities identified within the Local Development Framework.
Sky Properties	The policy is in line with energy and climate change policy.	Noted.
Carter Jonas	The approach to the issue of Combined Heat and Power is acceptable and in accordance with current guidance. However the use of the phrase 'all reasonable opportunities ...' is imprecise and should be reworded.	Consider inclusion of information in supporting text detailing what might constitute a reasonable opportunity.
The Environment Agency	We agree that opportunities to generate heat and/or power should be maximised however it should not prevent the development of non-CHP development that has the potential to deliver important waste infrastructure.	The Waste Plan is in line with the Waste Hierarchy, which promotes energy recovery over disposal.

Response

Development Management

5.4 It is therefore proposed that the wording change suggested by MPG will be made and additional supporting text will be included as part of the justification.

Development Management

Question 11

5.5 Do you agree with the Preferred Option approach set out in Policy Direction 6 'Restoration and Aftercare'? Is there anything else we need to include in the policy?

Table 56 Response to Question 11

Response Received	No. of Responses	Respondents
Agree with approach to 'Restoration and Aftercare'	7	Viridor Waste Disposal, The Ramblers Association, Stockport MBC, Cheshire West and Chester Council, Natural England, MPG and Carter Jonas
Suggested additional information	4	GMWDA, MPG, MEAS and the Environment Agency

5.6 The outcomes relating to Policy Direction 6 'Restoration and Aftercare'? are set out in the table below.

Table 57 Policy Direction 6 'Restoration and Aftercare' Representations

Respondent	Representation	Commentary
Viridor Waste Disposal	Viridor agree with the Preferred Option approach set out in Policy Direction 6 'Restoration and Aftercare'	The three representations regarding the approach to 'Restoration and Aftercare' are all in support. We will therefore be taking our approach forward into the final draft of the Waste Plan.
The Ramblers Association	The Ramblers Association agree with the Preferred Option approach set out in Policy Direction 6 'Restoration and Aftercare'	
Stockport MBC	Stockport Council supports the approach set out in Policy Direction 6 in relation to the	

5 Development Management

Respondent	Representation	Commentary
Cheshire West and Chester Council	<p>restoration and aftercare of residual waste disposal sites.</p> <p>The council agrees with the approach although believes the policy approach is restricted to residual waste disposal. There are other waste management operations such as open windrow composting sites to which this policy would also be applicable. Therefore the scope of policy could be widening to include such waste management facilities.</p>	<p>This policy is intended to apply to temporary operations such as residual waste disposal which results in a change to original ground levels and which therefore require suitable restoration. It is not considered that open windrow composting falls within this category.</p>
Natural England	<p>Natural England welcome that consideration will be given to a combination of social, environmental and economic issues when choosing the most appropriate final land use for a restored site, reflecting their response to the Issues and Options consultation.</p> <p>They commend the recognition within paragraph 6.20 of the potential to achieve environmental benefits such as improved nature conservation/biodiversity interest; however we would welcome some reference to the potential long-term impacts of waste facilities on the landscape, particularly landraise and landfill.</p>	<p>Noted.</p>

Development Management

Respondent	Representation	Commentary
GMWDA	<p>They welcome the recognition in paragraph 6.21 that site restoration can complement other plans and strategies, such as Green Infrastructure.</p> <p>"Policy direction 6 should clearly state that the use of restored land will not be limited to certain types. Rather its use will be determined by site specific, social, environmental and economic conditions. The after care arrangements will be determined by the IPPC permit so do not necessarily need to be covered by the policy."</p>	<p>Noted. Potential uses will not be limited by the Waste Plan. This is currently set out in the justification to the policy and consideration will be given to the need to include this within the policy itself.</p>
MPG	<p>"We agree in principle but as with the restoration of worked out mineral sites if final restoration is only going to be achieved in the long term then an appropriate planning condition requiring submission of a final restoration nearer the end of the operations allows for changes in circumstances and improved restoration techniques to be incorporated."</p>	<p>It is important to ensure that an acceptable after-use of the sites is established and this should form part of the original planning application for development. Should there be any change in circumstances, this would require an application to vary conditions.</p>
MEAS	<p>"One additional observation: the supporting text notes that an alternative of restricting restoration of landfills to certain after-uses</p>	<p>Noted. Consider Inclusion of information in supporting text to provide further information on what should be submitted as part of the</p>

5 Development Management

Respondent	Representation	Commentary
	was rejected based on previous consultations. Therefore perhaps the first requirement ought to seek explanation/justification of the restoration plan and an indication of the amenity and other benefits it will offer as appropriate."	planning application, for example, explanation/justification of the restoration plan and an indication of the amenity and other benefits it will offer as appropriate.
Carter Jonas	Policy Direction 6 sets out the requirements for site restoration and aftercare proposals which are not unduly onerous and provide for a flexible approach. The Policy Direction is supported.	Noted.
The Environment Agency	The policy direction for restoration and aftercare should compliment and be consistent with any such requirements in the Environmental Permitting regime.	Noted. This should be reflected in the supporting text to the policy.

Response

5.7 It is proposed to take the policy direction as set out in the Preferred Option and additional information will be included in the supporting text as described in Table 57 'Policy Direction 6 'Restoration and Aftercare' Representations'.

Development Management

Question 12

5.8 Do you agree with the Preferred Option approach set out in Policy Direction 7 'Unallocated Sites'? Is there anything else we need to include in the policy?

Table 58 Response to Question 12

Response Received	No. of Responses	Respondents
Agree with the approach to 'Unallocated Sites'	7	Viridor Waste Disposal, The Ramblers Association, Stockport MBC, Cheshire West and Chester Council, GMWDA, Carter Jonas and the Environment Agency
Disagree with the approach to 'Unallocated Sites'	4	Derbyshire County Council, MPG, MEAS and The Emerson Group
Additional inclusion suggested	1	Natural England

5.9 The outcomes relating to Policy Direction 7 'Unallocated Sites' are set out in the table below.

Table 59 Policy Direction 7 'Unallocated Sites' Representations

Respondent	Representation	Commentary
Viridor Waste Disposal	Viridor agree with the Preferred Option approach set out in Policy Direction 7 'Unallocated Sites'	The three representations regarding the approach to 'Unallocated Sites' are all in support. We will therefore be taking our approach
The Ramblers Association	The Ramblers Association agree with the Preferred Option approach set out in Policy Direction 7 'Unallocated Sites'	

5 Development Management

Respondent	Representation	Commentary
Stockport MBC	Stockport Council supports the approach set out in Policy Direction 7 in relation to development of waste management facilities on unallocated sites.	forward into the final draft of the Waste Plan.
Cheshire West and Chester Council	The council agrees with the approach, although believes the approach could be widened to also make reference to proposals also meeting the requirements expected of proposals on preferred sites and areas. Reference could also be made to the applicant being required to set out the suitability of the unallocated site against the Waste Plan's site selection criteria.	Proposals for waste development on unallocated sites will be assessed against the same Development Management policies as proposals on allocated sites.
Derbyshire County Council	Derbyshire County Council disagree due to the following reasons: 1. The Report does not explain why "the Waste Plan must strike a balance between allowing the development of too many waste facilities (known as over provision) and not planning for sufficient facilities to deal with the waste arisings". Over-provision is not necessarily bad. In this case, it would be unwise to risk "not planning for sufficient facilities". 2. There is no need to restrict the choice of waste management developments. Indeed, government policy is to provide a variety of sites, to give flexibility and encourage innovation.	1. Include information in supporting text on why the waste plan should strike a balance between over and under provision of sites for waste management facilities. For example, this could include reference to the fact that the plan will be monitored and the need assessment reviewed following adoption of the Waste Plan.

Development Management

Respondent	Representation	Commentary
	<p>3. Sites can have a permission for several different developments, so the fact that a site may, as a result of “over-provision”, have an unimplemented waste permission need not prevent it from being developed (with permission) for, say, industry.</p> <p>4. Waste data is not absolute and prediction is hazardous. The policy riskily assumes that the capacity gap estimate is sufficiently reliable to provide a basis for restricting development.</p> <p>5. The policy conflicts with the plan’s stated aim of “maximising recycling and recovery of waste” (paragraph 3.8) and diverting from landfill, which implies a need to encourage an abundance of recovery sites.</p>	<p>2. It is not the intention of the Waste Plan to restrict the types of waste management facilities that come forward on allocated sites. The Waste Plan will be a flexible document to allow for innovation in the waste industry.</p> <p>3. The Waste Plan is flexible in the allocation of ‘areas’ and it will not restrict ‘areas’ to waste uses as these sites will be suitable for a variety of uses. However, ‘sites’ allocated in the Waste Plan are identified for waste uses.</p> <p>4. The Need Assessment, which identifies the future capacity gap in waste provision, will be reviewed prior to publication. In addition, it is intended that the Need Assessment will</p>

5 Development Management

Respondent	Representation	Commentary
Natural England	Natural England would welcome a further point within Policy Direction 7 to state that applications for waste management facilities on unallocated sites will only be considered where they adhere to development management criteria concerning the protection of the natural environment.	<p>be reviewed periodically following adoption of the Waste Plan.</p> <p>5. The Waste Plan will be in line with the Waste Hierarchy and will identify sufficient sites to maximise opportunities for recycling and energy recovery over final disposal of waste.</p>
GMWDA	The preferred option approach to permitting unallocated sites is acceptable. The facility should only be granted permission where it can be demonstrated that there is a need within the updated Needs Assessment. GMWDA also agrees with frequently updated the Needs Assessment particularly where large separation facilities come on-line that will to changes in the capacity gap for down-stream processing.	<p>Agree this is important and this is already stated in paragraph 6.2 at the beginning of the Development Management section.</p> <p>Consider inclusion of information in supporting text to provide further information on local geographical need.</p>

Development Management

Respondent	Representation	Commentary
MPG	<p>Rightly, the policy should examine whether other sites would be suitable before granting permission but should also consider whether there is a local geographical need that could, for example, reduce the impacts of transport.</p> <p>An unallocated site may be far more environmentally acceptable than sites already allocated. Thus, the policy is too prescriptive and needs to have built in flexibility. People are allowed to change their minds following new evidence – The DPD need a similar facility. Also the second element of the Policy does not reflect the justification at 6.27 and 6.28.</p>	<p>Disagree that this policy is too prescriptive. The purpose of identifying sites for future waste management facilities in the Waste Plan is to inform the public and developers on the likely locations of future waste development. These sites have already undergone Sustainability Appraisal. It is accepted that sites may come forward that were not available at the time of preparation of the Waste Plan that may be more appropriate and it is intended that this policy deals with these sites.</p>

5 Development Management

Respondent	Representation	Commentary
MEAS	<p>"The second bullet in the question appears eminently sensible. However we (Merseyside EAS) have been advised that the applicant does not have to provide compelling evidence for need provided that the proposal complies with the other development management controls, whether in the Waste DPD or in a local authority's Development Management DPD. We recognise this situation weakens the extent to which waste management is plan-led, but this is the guidance we have received.</p> <p>Our response of "object" is merely to draw your attention to this issue which will need further consideration and clarification before the policy position is established."</p>	Noted. Consider this issue further and seek guidance from GONW on this matter.
Carter Jonas	The approach taken to unallocated sites is acceptable.	Noted.
The Environment Agency	The approach for unallocated sites importantly allows for flexibility in the waste planning process. What is the right facility and right place currently may not be so later in the plan lifetime and flexibility will assist with future regulatory compliance and the improved recovering/recycling rates.	Noted.
The Emerson Group	As a non-site specific objection, Policy Direction 7 reads applications for waste management on unallocated sites can be allowed where the applicant can demonstrate	

Development Management

Respondent	Representation	Commentary
	<p>(l) a need for development and (ii) none of the allocated sites are suitable/available.</p> <p>There are no criteria to say the site should be suitable in other terms therefore an additional criteria is required.</p> <p>An additional criteria to the policy should be added and not contrary to other Local Plan Policies.</p>	

Response

5.10 It is proposed that the supporting text to this policy will be amended as set out in Table 59 'Policy Direction 7 'Unallocated Sites' Representations'. Further guidance will be sought regarding whether applicants can be required to demonstrated need for a development.

5 Development Management

Question 13

5.11 Do you agree with the Preferred Option approach set out in Policy Direction 8 'Safeguarding'? Is there anything else we need to include in the policy?

Table 60 Response to Question 13

Response Received	No. of Responses	Respondents
Agree with the approach to 'Safeguarding'	8	Viridor Waste Disposal, The Ramblers Association, Cheshire West and Chester Council, Natural England, GMWDA, MEAS, Carter Jonas and the Environment Agency
Suggested additional information	2	Stockport MBC and GMWDA
Other	1	Peel Environmental
Disagree with the approach to 'Safeguarding'	1	MPG

5.12 The outcomes relating to Policy Direction 8 'Safeguarding' are set out in the table below.

Table 61 Policy Direction 8 'Safeguarding' Representations

Respondent	Representation	Commentary
Viridor Waste Disposal	Viridor agree with the Preferred Option approach set out in Policy Direction 8 'Safeguarding'	The two representations regarding the approach to 'Safeguarding' are both in support. We will therefore be taking our approach forward into the final draft of the Waste Plan.
The Ramblers Association	The ramblers Association agree with the Preferred Option approach set out in Policy Direction 8 'Safeguarding'	

Development Management

Respondent	Representation	Commentary
Stockport MBC	<p>It is suggested that the final paragraph of the Policy Direction be reworded as follows to provide greater strength and therefore greater certainty that sites allocated for waste use will not be too easily lost to alternative development:</p> <p>Applications for non-waste uses on sites with existing planning permission for waste management facilities or sites allocated within the Plan will only be permitted where it can be demonstrated <i>(by the applicant)</i> that there is no longer a need for the facility, that the capacity can be met elsewhere in Greater Manchester, or that there is a <i>greater</i> need for the <i>non-waste</i> development in that location.</p>	Amend wording as suggested.
Cheshire West and Chester Council	The Council agrees with the approach as the proposed Policy Direction 8 seeks to protect sites to ensure the delivery of new waste management capacity. The policy may benefit from being clearer that is safeguarding allocated waste sites rather than just allocated sites.	Noted. Amend policy to refer to '...sites allocated for within the Plan for waste uses....'
Peel Environmental	Peel has concerns with respect to 'Policy Direction 8 – Safeguarding' and to the impact this may have on the use of land at the allocated site, or adjacent to the allocated site. Whilst it is recognised by Peel that allocated waste management sites need to be safeguarded, there should be included with the Plan a periodic review of these sites in order to protect against unnecessarily sterilising other development that maybe suitable and needed at the site or adjacent to it. Further if waste management developments are built on non-allocated sites, or at	The Needs Assessment will be reviewed periodically which will indicate the future capacity gap and whether this has changed. This can be used by developers when they are demonstrating need for the development. The Waste Plan will be monitored annually and, as required by PPS10, the Waste Plan will be reviewed every 5 years.

5 Development Management

Respondent	Representation	Commentary
Natural England	<p>regional scale facilities such as Ince Park, then there may no longer be for the allocation, and as such a mechanism to review the allocated sites is required.</p> <p>Natural England welcome the inclusion of a policy direction relating to safeguarding those sites that have been through the sustainability appraisal process and are considered suitable to allocate for waste management facilities. They support the decision not to safeguard all existing waste facilities as these have not all been through the sustainability appraisal process (as recognised within paragraph 6.50) and thus may not be the most suitable locations for waste management in terms of the environmental and other impacts.</p>	Noted.
GMWDA	<p>GMWDA agrees with only safeguarding certain major existing facilities and/or types of waste management facility to allow non-waste proposals to be brought forward where appropriate.</p> <p>Therefore, GMWDA agrees with the approach to safeguard existing non-hazardous landfill (due to the current lack of capacity), biodegradable waste treatment and municipal waste management facilities to meet stringent EU targets.</p> <p>The approach adopts a safeguarding buffer zone of 250 metres for landfill, but should also consider whether other open air facilities, particular composting, would benefit from a similar zone since bioaerosols are more closely associated with organic waste treatment</p>	<p>Noted. Open windrow composting was not included in this policy as it is not thought to be as strategically important as landfill/ landraise. Potential locations for landfill/ landraise in Greater Manchester are very restricted which is why it is proposed they are safeguarded. It is considered that there is more flexibility in locations for open windrow composting which is why they are not specifically included in the policy.</p>

Development Management

Respondent	Representation	Commentary
MPG	<p>facilities, and this would align the policy to the Environment Agency's which has presumption against permitting unless supported by a site-specific risk assessment.</p> <p>"No we do not agree with the Preferred Option approach set out in Policy 8. Existing facilities do need to be safeguarded generally. It may be sensible/possible to ignore those site below a certain Ha threshold but certainly not all existing facilities."</p>	<p>It is not the intention of the Waste Plan to safeguard all existing sites. However, the waste management capacity provided by existing sites will be safeguarded through the requirement to demonstrate that the site is no longer required in terms of need, that the capacity can be met elsewhere or that there is a specific need for the proposed development.</p>
MEAS	<p>"Support strongly. Safeguarding is essential to prevent re-allocation of scarce plots of land suitable for waste management for other uses, and to ensure there is scope for intensification of use of any existing facilities provided it complies with other development management principles."</p>	<p>Noted.</p>
Carter Jonas	<p>"The approach towards safeguarding allocated sites from development that may have an adverse impact on the potential of the site to be worked effectively is welcomed."</p>	<p>Noted.</p>
The Environment Agency	<p>The approach to safeguarding should help ensure the deliverability of certain sites. Many are in locations where 'simpler' environmental permit applications would be available.</p>	<p>Noted.</p>

Development Management

Response

5.13 It is proposed to amend the wording of the Policy to reflect the suggestions made in Table 61 'Policy Direction 8 'Safeguarding' Representations'.

Development Management

Question 14

5.14 Do you agree with the Preferred Option approach to waste minimisation? Is there anything else we need to include?

Table 62 Responses to Question 14

Response Received	No. of Responses	Respondents
Agree with the approach to waste minimisation	5	The Ramblers Association, Stockport MBC, Cheshire West and Chester Council, GMWDA, Carter Jonas and the Environment Agency
Disagree with the approach to waste minimisation	1	MEAS

5.15 The outcomes relating to waste minimisation are set out in the table below.

Table 63 Waste Minimisation Representations

Respondent	Representation	Commentary
The Ramblers Association	The Ramblers association agree with the Preferred Option approach to waste minimisation. They believe in promoting the maximum re-use of materials.	The representation regarding the approach to waste minimisation is in support. We will therefore be taking our approach forward into the final draft of the Waste Plan.
Stockport MBC	Stockport Council strongly supports the approach to waste minimisation. The issue might perhaps be given greater precedence or higher profile by this policy being listed first of all the Development Management policies.	Noted. Consider moving section on waste minimisation to the start of the Development Management policy section to reflect the priority

5 Development Management

Respondent	Representation	Commentary
Cheshire West and Chester Council	<p>The Council agrees with the approach. The Council also states that 'The proposal for a joint Supplementary Planning Document is one tool that could be adopted to ensure that waste is minimised in new development both during the demolition and construction phases and once built/operational. Although the Waste Plan may not be seen as an appropriate location for a policy on waste minimisation it could provide a policy hook from which a Supplementary Planning Documents could be prepared, unless this is to be provided consistently in the Core Strategies of the Greater Manchester Authorities.'</p>	<p>of waste minimisation in the Waste Hierarchy.</p> <p>Noted.</p>
GMWDA	<p>The approach taken is deemed suitable. A joint approach to minimising waste in developments will encourage waste prevention in all types of new development rather than just limiting it to Waste Facilities through the waste plan.</p> <p>Certainly, a Supplementary Planning Document (SPD) that encouraged developers to consider how waste would be managed throughout the lifespan of the development (ie. during the construction, use and at the end of its life) would be welcomed.</p>	<p>Noted.</p>
MEAS	<p>"We disagree rather than object. The Regional Waste Strategy already establishes the role and primacy of the JMWMS as a mechanism for delivering and monitoring waste minimisation initiatives. Any policy, whether it is in the Waste DPD or Councils' LDFs is therefore a duplication and is likely to be objected to by the Government Office or by the Inspector on</p>	<p>Noted. It is not proposed to include a policy on waste minimisation in the Waste Plan, rather it is intended that the Waste Plan will encourage a joint approach to minimising</p>

Development Management

Respondent	Representation	Commentary
	those grounds. If there is to be a policy then perhaps it could address how the Waste DPD proposes that waste minimisation will be addressed, providing a clear indication of how much you will rely on SWMPs, and how waste growth and the effect of minimisation initiatives will be monitored."	waste in developments that will be complement the approach within the JMWMS.
Carter Jonas	The development of a Specific DPD on waste minimisation is supported.	Noted.
The Environment Agency	Waste minimisation is important to have been included. The waste plan should take the lead in setting out the importance of waste minimisation in all waste developments and set an example for other development planning. A joint SPD on waste minimisation would help embed it further into all developments. Encouraging a joint approach to minimising waste in developments could improve the robustness of the waste plan and help mitigate one of the largest future risks in the plan, the potential need for new landfill sites.	Noted.

Response

5.16 Respondents agreed the importance of including waste minimisation in the Waste Plan. Although a specific policy will not be developed, the Waste Plan will encourage joint working between the Greater Manchester districts to minimising waste in all developments.

Development Management

General Comments

6 General Comments

General Comments

6.1 This section sets out the the general responses made to the Preferred Options Report and recommendations for dealing with them.

Horwich Town Council

6.2 The Town Council were pleased to have been consulted but its members had no comments to make regarding the Preferred Option Report.

Response

Noted.

Salford City Council

6.3 The City Council has raised concerns with regard to a number of the proposed allocations within the Preferred Option report, which are set out in detail within the earlier parts of this report. In most of these instances the City Council is not raising fundamental objections to the principle of waste uses in these locations, but does consider it important to ensure that any allocations within the Joint Waste Plan reflect the specific site constraints which will necessarily frame the acceptability of any future waste management facilities in these locations. It will be important that the Publication Joint Waste Plan provides scope for these key site specific constraints to be identified. This could be achieved through the policy text itself, or the reasoned justification. It is considered important that these constraints are identified within the Joint Waste Plan, as they will necessarily frame the deliverability of the allocated sites for waste uses.

Response

It is intended that the wording of policies and supporting text in relation to site allocations and development management issues will be subject to review and further development in advance of the stage of the Waste Plan.

Network Rail

6.4 Examination of the revealed site allocations within 250 metres of railway infrastructure for:-

- Built waste management facilities: BL6, BU9, OL4, OL5, ST2, ST9, TR16
- Preferred areas for built waste management facilities: MC1, OL1, SL2, SL3,ST6, ST7, ST8, TR17
- Potentially suitable sites for built waste management facilities: TR16, W18

6 General Comments

6.5 There are no proposed landfill sites within 250 metres of railway infrastructure, although there are references to several sites adjacent to the railway in Neighbouring Authorities where Greater Manchester waste is accepted.

6.6 As all the sites included within the Waste Plan will require planning permission it is requested that Network Rail is consulted on these and any other planning applications for waste management proposals within 250 metres of railway property. At which point conditions to protect the interests of Network Rail are supplied to the Development Control Department or objections raised dependant upon circumstances.

Response

6.7 Noted. This information does not affect the inclusion of sites at this time, and Network Rail will be consulted on relevant planning applications as they come forward.

Natural England

6.8 Natural England welcome specific recognition of the Government's objectives of sustainable development, protecting human health and the environment in Paragraph 1.5. They would however, welcome an alteration in the wording so as to read "...protecting human health and the natural environment".

6.9 Natural England strongly support the joint working by the 10 Greater Manchester Authorities that enables a strategic approach to the management of waste across the whole of Greater Manchester and the consideration of cross boundary issues as described in Paragraph 1.8. Natural England welcome the confirmation within Paragraphs 1.22 and 1.23 that the Preferred Option Report has been informed by Sustainability Appraisal and Habitats Regulations Assessment.

6.10 Natural England welcome confirmation in Paragraph 4.8 that Sustainability Appraisal findings have contributed to the site selection process. While they support the reference within Policy Directions 2 and 3 to the importance that any waste management facility 'fits' with the surrounding land uses, they would welcome a greater recognition within the supporting text in this section and within Policy Direction 4 of the potential landscape implications of waste facilities, especially built facilities, landfill and landraise, particularly where co-location of such facilities may occur. They explain they are not in a position to comment about whether the suggested sites should be allocated for built waste management facilities, although we welcome the fact that all of the sites have been subject to a detailed site selection process and sustainability appraisal.

6.11 Natural England agree that it is appropriate for the Joint Waste Plan to contain Development Management policies setting out how proposals will be dealt with and welcome the inclusion of such criteria based policies that can be used to facilitate the assessment of sites as they come forward within planning applications.

6.12 Although Natural England welcome the inclusion of considerations such as nature conservation and air emissions within the list of issues that applicants will need to submit information about through referring to general development

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management policies elsewhere in the Local Development Folder, they would welcome specific mention of other important issues including geodiversity, landscape and townscape. They would also welcome a specific development management policy for the Joint Waste Plan covering these concerns, rather than simply referring to policies elsewhere in the Local Development Folder. They explain that this would also allow for the development of a locally distinctive policy relevant to waste management development, rather than just repeating higher level policy.

6.13 Natural England welcome the inclusion of an indicator covering the amount of land returned to an after use which increases biodiversity. However, they would welcome the consideration of biodiversity issues in the design and operation of the facility to secure gains without waiting until the end of the life of the facility, e.g. through appropriate landscaping and management at the construction and operation phases. They would like to see reference made to 'Biodiversity Duty' within this section, as at the Issues and Options stage, and this could also be done elsewhere in the document. They would also welcome reference to Biodiversity Action Plan targets and Landscape Character Assessments within the Monitoring section.

6.14 Natural England explain that the Sustainability Appraisal Review supports their opinion that the Waste Plan would benefit from the inclusion of a policy providing further detail on the assessment criteria that should be applied by local authorities to waste facility planning applications. Natural England go on to say that the Sustainability Appraisal Review recommends that an actual Policy Direction is formulated around the list of issues set out in paragraph 6.6 of the Preferred Option Report and on any relevant design issues. It is strongly support this recommendation and as already described, would welcome the expansion of this list to include issues such as geodiversity and the landscape.

Response

6.15 The comments recieved in relation to the consideration of landscape implications of waste facilities will be considered further as part of the development of the next stage of the Waste Plan. As the Waste Plan will form part of each of the ten Greater Manchester Local Development Frameworks it is not appropriate to repeat policies contained within the other documents of the Local Development Framework, therefore signposting to the location of these other policies is unavoidable. The suggestion to include the consideration of biodiversity issues in the design and operation of the facility is an issue which will be specifically covered by policies elsewhere within the Local Development Frameworks and therefore is not required within the Waste Plan.

6.16 A policy will be included within the next stage of the Waste Plan which sets out the assessment criteria to be applied to waste facility planning applications. The suggestion to include issues such as geodiversity and landscape will be explored in the development of this policy.

Manchester Airport

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6.17 Manchester Airport explain that to ensure that relevant planning applications consider aerodrome safeguarding, Circular 1/2003 states that local development plans and Unitary Development Plans "should include a policy stating that officially safeguarded areas have been established for a particular airport or technical site, that certain planning applications will be the subject of consultation with the operator of that aerodrome or technical site and that there may be restrictions on the height or detailed design of buildings or on a development which might create a 'bird' hazard. The outer boundary of the safeguarded areas should be indicated on proposals maps accompanying local plans and Unitary Development Plans. A plan should state why an area has been safeguarded and that it is neither the responsibility nor the proposal of the Local Planning Authority".

6.18 Manchester Airport continue to explain that "In accordance with Circular 1/2003, we strongly advise that you reconsider your decision not to include an aerodrome safeguarding policy within the emerging Waste Plan. Bird strike issues specific to waste management facilities and the restoration and after use of minerals sites are not currently contained in any planning documents specific to the Greater Manchester area. The policy documents that exist are not planning policy documents and do not cover the non-safeguarded aerodromes in the Greater Manchester area. We therefore recommend that an aircraft safety policy be included in the Waste Plan, similar to that found in the Cheshire Replacement Waste Local Plan (adopted 2007)."

Response

6.19 The inclusion of a specific policy relating to Aerodrome safeguarding has been explored at previous stages of the Waste Plan following extensive consultation. Due to the range of development to be covered by such a policy it is intended that it is not appropriate to include a specific policy within the Waste Plan, instead the Local Development Frameworks of Greater Manchester will include such a policy in an appropriate document.

The Mineral Planning Group

6.20 **The Mineral Planning Group (MPG)** states that "The Preferred Option Report fails to recognise that there could be sites and/or areas which have no waste facilities at present but may be ideally suited for the development of a cluster of waste facilities. Whilst the Preferred Option Background Information document (para 49) recognised via "Inclusionary Criteria" the potential suitability of

- Existing or worked out quarries;
- Quarries that are known to come forward during the Waste Plan period; and
- Existing land fill sites.

for Residual Waste Disposal Facilities, the exclusionary criteria for Built Facilities has Green Belt listed.

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6.21 Para 4.5 recognises that "...certain categories of land cannot be absolutely excluded via this process," and states that "...for example sites within the Green Belt may be appropriate for specific waste facilities such as landfill or composting".

6.22 This fails to recognise that existing or worked out quarries will have already gone through the rigorous planning regime to gain permission and nearly always have well developed mitigation measures in place such as screening bunds, good access, weighbridge/wheelwash infrastructure etc. all of which make them well suited for possible Built Waste Facilities as well as the suggested "landfill or composting". This flexible approach needs to be incorporated or the prudent use of such existing resources will have been dismissed simply through an over restrictive sieve analysis technique."

6.23 MPG believe paragraph 6.38 appears to contradict what is said in para 6.33 particularly in relation to the comment regarding low-value.

Response

6.24 The adopted criteria used in searching for and identifying sites/areas as required in Greater Manchester has been subject to significant levels of consultation. In relation to the issue of greenbelt land, this landuse was removed for consideration based on the fact that Greater Manchester has adequate land available for the identification of built waste management facilities without the need to develop greenbelt land. National Planning Policy supports this approach and allows for the consideration of some specific waste facilities to be located in the green belt where this is compatible with the purpose of the greenbelt designation.

6.25 Although existing or worked out quarries have been though the planning process, these permissions have been considered for mineral operations only, which are temporary uses. As stated within Planing Policy Guidance 2: Greenbelts minerals extraction need not be inappropriate development, however this use is markedly different from the permanent operation of a built waste facility, which are akin to a B2 uses in many cases. Therefore it is not intended to consider the location of built waste management facilities within the greenbelt for the purposes of the Waste Plan.

Sky Properties

6.26 Sky Properties state that "The overall aim of the Waste Plan is strongly supported. However they also state "while we support the general approach to identifying gaps in capacity it is our view that the Waste Plan is not ambitious enough in promoting waste recovery. Landfill remains a significant disposal option and much more could be done to promote recovery in terms of Anaerobic Digestion and advanced thermal treatment." They state "It should be noted that the Runcorn facility is permitted for domestic waste."

Response

6 General Comments

The facility types required are based on a carefully modelled scenario of growth and development, revisions to the needs assessment in spring 2010 will consider the current economic situation and therefore the types and number of facilities required may be amended.

MEAS

6.27 MEAS state "The range of indicators looks quite limited. We also note that it does not include any NI series indicators. We have been advised by Government Office that NI and former BVPI parameters should be used in the first instance, and that it is not necessary to introduce a significant number of new indicators at this stage."

6.28 Regarding Table 3 they state "Site type A could be explained more clearly, especially as this section of the DPD refers to "built facilities" yet types A and B are both open, presenting different mitigation priorities compared to the rest. We assume 'A' covers inert waste transfer stations and aggregates recycling facilities, which will tend to be on open sites.

6.29 Regarding paragraph 3.10 "To reiterate a point made elsewhere, the forecasting period needs to be up to 15 years from adoption, meaning that it needs to cover at least 2012-27 (plus the pre-adoption period)."

Response

6.30 Comments regarding indicators for monitoring purposes, clarity of expression for facility types and the forecasting period for the Plan have been noted, these areas will be revisited during the development of the next stage of the Waste Plan.

The Environment Agency

6.31 Refer to letter of 13th November 2008 regarding the Stage 2 Issues and Options for our general site comments and comments on the individual sites and areas. In addition, we are producing revised Flood Maps for the Manchester Ship Canal which may have flood risk implications for TR17, Trafford Park. Any development within this area should take into account the findings and recommendations of the Strategic Flood Risk Assessment currently being prepared by the Council. We have no comment to make on the Sustainability Appraisal Review.

Response

6.32 Noted. Flood Risk Issues will be further considered during the development of the next stage of the Waste Plan.

Additional Sites

6.33 Two additional sites were put forward by The Mineral Planning Group (MPG) for consideration within the Waste Plan. The sites are Pilkington Quarry which MPG propose for restoration infilling with residual inert C&D waste plus ancillary secondary

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aggregate recycling facility. and Montcliffe Quarry which they propose for a materials recycling facility. Both of these sites are located within the district of Bolton. MPG believe both sites fall into Band A/B.

Response

6.34 Both sites have been considered previously as part of the Issues and Options: Residual Waste Disposal Consultation. The conclusions at that stage took account of the existing planning permissions allowing for restoration by the importation of residual waste, therefore the permitted capacity available at these sites has been included within the calculations for future waste management requirements. The approach to residual waste disposal has been developed on the basis of the evidence for future waste management requirements and also current knowledge of the waste industry. For inert waste, the preferred approach was not to allocate any sites for the disposal of residual waste, substantiated by evidence that restoration, regeneration and engineering schemes which require this waste are continually coming forward.

6.35 In relation to Built Waste Management Facilities, the methodology excluded all Green Belt Land across Greater Manchester as there are significant industrial and other land designations appropriate for the long term development of such waste facilities.

6.36 In light of this submission, discussions are ongoing at Bolton Council regarding any future development opportunities at these sites. Considerations such as appropriateness of development, Green Belt location, scale of proposals, amenity, transport will all be key considerations. A final decision on the inclusion of these sites will be made during the development of the next stage of the Waste Plan and communicated to the landowner in advance of consultation of the Publication Draft DPD in November 2010.

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Next Steps

1 Next Steps

1.1 The results of the Preferred Option and Issues and Options consultations, the outcomes of the stakeholder events held during March and October 2008, and September 2009 and the results of the Sustainability Appraisal, along with all the evidence base information such as the Needs Assessment will be used to inform the draft Publication version of the Waste Plan, which will be made available for consultation in November 2010.

Next Steps