

Greater Manchester Joint Waste DPD Sustainability Appraisal / Strategic Environmental Assessment Preferred Option Sustainability Appraisal Review

October 2009



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Preferred Option Sustainability Appraisal Review October 2009

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Scott Wilson
Brunel House
54 Princess Street
Manchester
M1 6HS

Tel 0161 907 3500
Fax 0161 907 3501

www.scottwilson.com

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1 Introduction & the Role of Sustainability Appraisal

- 1.1.1 This Sustainability Appraisal (SA) Review provides a review of the Greater Manchester Joint Waste DPD Preferred Option in relation to the sustainability of the Plan, if it were to be taken forward with the Policy Directions and Site Allocations the Preferred Option proposes. This SA Review is not a full SA Report but it is designed to review how sustainability has been incorporated into the preparation of the Preferred Option and to provide a summary assessment of the sustainability merits of the Preferred Option and how it can be improved to be still more sustainable. As such, this SA Review will contribute to the Final SA Report that will accompany the Publication Draft Plan submitted to the Secretary of State in February 2011.
- 1.1.2 SA also incorporates SEA (Strategic Environmental Assessment) and so fulfils both the European requirements for SEA in EU Directive 2001/42/EC¹ and the national requirements for SA / SEA of Local Development Documents (LDDs) found in the Environmental Assessment of Plans and Programmes Regulations 2004² and the Planning and Compulsory Purchase Act 2004³. Its role is to ensure that LDDs promote sustainable communities and sustainable development, afford appropriate protection to the environment and that the proposals and policies in the LDDs are themselves as sustainable as possible.
- 1.1.3 This SA Review will assess the Preferred Option and consider how it will positively or negatively affect the Sustainability Objectives identified in the SA Scoping Report (September 2006) and then make recommendations on how the Plan can be improved to encourage further positive effects and propose possible mitigation measures to off-set or reverse any identified negative effects. The SA Objectives can be found in Table 1 below.

¹ <http://www.environ.ie/en/Publications/Environment/Miscellaneous/FileDownload.1805.en.pdf>

² <http://www.opsi.gov.uk/si/si2004/20041633.htm>

³ http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1

2 The Greater Manchester Joint Waste DPD SA Story So Far

2.1 SA Scoping Report

2.1.1 The SA Scoping Report sets out the policy and programme context that surrounds this DPD and all relevant baseline data to the DPD. It then reviews this context and baseline data and identifies key issues in the Greater Manchester area relating to the sustainability of waste management. These key issues were used to directly inform the SA Objectives that form the SA Framework against which the Plan will be assessed. The Scoping Report was consulted upon with three statutory bodies (Natural England, the Environment Agency and English Heritage) and any recommended improvements to the Scoping Report and SA Framework incorporated. The SA Objectives are as follows:

Table 1: SA Objectives

SA objectives
1. To exploit the growth potential of business sectors
2. To encourage sustainable economic growth and assist in reducing the disparities of sub-regional economic performance
3. To develop and market the region's image
4. To develop and maintain a healthy labour market
5. To reduce the need to travel, improve choice and use of sustainable transport modes
6. To improve physical health and mental health and reduce health inequalities
7. To improve access to good quality affordable and resource efficient housing
8. To enable groups and communities to contribute to decision making, and to reduce social exclusion
9. To improve access to and use of basic goods, services and amenities for all groups
10. To protect, enhance, manage and restore where appropriate, the rich diversity of cultural, built environment and archaeological assets and their settings
11. To protect, enhance, manage and restore where appropriate biodiversity, landscape character and accessibility, protected species, habitats and sites of geological importance
12. To protect and improve local environmental quality and reduce crime
13. To protect and improve the quality of controlled waters
14. To protect and improve air quality
15. To restore and protect land and soil and to manage contaminated land
16. To mitigate and adapt to climate change, minimise the risk of flooding and increase use of SUDS

17. To ensure the prudent use of natural resources and the sustainable management of existing resources
18. To minimise the requirement for energy use, promote efficient use and increase the use of energy from renewable resources
19. To manage waste sustainability; minimise waste, its production, and increase re-use, recycling and recovery rates

2.2 Stage 1 Issues & Options

- 2.2.1 An Interim SA Report was prepared to accompany the Stage 1 Issues & Options Report of the Joint Waste DPD. This assessed the relative sustainability merits of the issues and options put forward at this stage and made recommendations as to the most sustainable option to take forward, where appropriate.

2.3 Stage 2 Issues & Options

- 2.3.1 A further Interim SA Report was prepared to accompany the Stage 2 Issues & Options Report of the Joint Waste DPD. This served the same purpose as that prepared at Stage 1 Issues & Options but, crucially, also provided an assessment of the options for the spatial distribution of sites and provided a summary of the results of the site appraisals carried out at this stage. In particular, the site appraisals made recommendations as to the suitability and sustainability of each individual site or area considered for different built waste management facilities and different residual waste disposal uses.

2.4 Preferred Option

- 2.4.1 At the Preferred Option stage there is no requirement for an SA Report but it is essential that sustainability remains an area of consideration throughout the preparation process for a DPD such as this. The recommendations of the Interim SA Reports at the two Issues & Options stages have guided and influenced the preparation of the Preferred Option and, with this SA Review, a further layer of consideration of sustainability is being applied to ensure that the Plan that emerges from this process is as sustainable as possible.
- 2.4.2 All of the SA work carried out at each stage, including this SA Review, will contribute to the Final SA Report to accompany the Publication Draft DPD and help tell the story of how the Plan has been prepared, as well as provide a final SA assessment of the Plan as it is submitted to the Secretary of State.

3 Sustainability Appraisal Review of the Preferred Option

3.1 Aims & Objectives

Statement 1

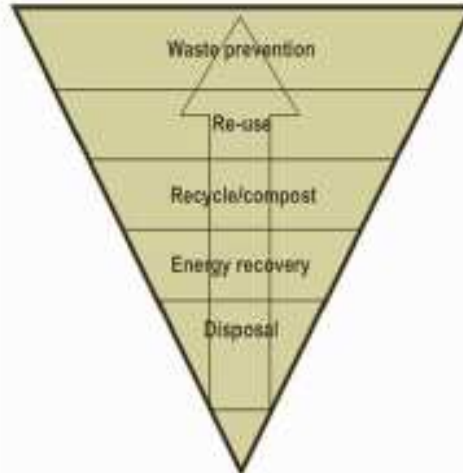
2.2 The overall aim of the Waste Plan is to provide a sound spatial planning framework to deliver sustainable waste management in Greater Manchester consistent with national and regional planning policies and the Waste Strategy for England 2007, in order to provide sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time.

- 3.1.1 The preferred Strategic Aim proposed within the Preferred Option can be considered a sustainable Strategic Aim. Assuming that a “sound spatial planning framework” would balance the environmental, economic and social needs of Greater Manchester and that “sustainable waste management” would be in accordance with the waste hierarchy, the Strategic Aim would support a broad range of SA objectives. The aim to provide facilities “of the right type, in the right place and at the right time” also performs well against most SA objectives, as it seeks to deliver waste management facilities in a balanced manner.
- 3.1.2 The rejected options were appraised in the Interim SA Report at Stage 1 Issues & Options. All promoted sustainability to a degree, but each often lacked an element of sustainability found in the other options. The preferred Strategic Aim brings all three options together quite well, so reflects the sustainability elements promoted within each.
- 3.1.3 The Strategic Objectives are broadly the same as those consulted upon at Stage 1 Issues & Options, and so the assessment of their sustainability carried out at that time in the Interim SA Report still stands. This found that the objectives proposed were found to be consistent with sustainable development principles and covered some key sustainability issues associated with waste management, all of which made them broadly sustainable. Alterations to Objectives 3 and 7 were recommended and these have been followed-up and the Objectives improved accordingly.

3.2 Future Waste Management Requirements

- 3.2.1 The Future Waste Management Requirements, as set out in Policy Direction 1 and its supporting text, are broadly sustainable, especially in regard of the fact that Scenario 2 of the Needs Assessment forms the basis of the future requirements. This scenario assumes Greater Manchester will maximise levels of waste recycling and recovery and therefore generally moves the management of waste up the Waste Hierarchy, reducing the need for landfill, the most unsustainable form of waste management.

Figure 1: The Waste Hierarchy



- 3.2.2 The Requirements are also sustainable simply by the fact that they enable sustainable planning and decision-making on waste management for now and the future by providing clear targets based on need.
- 3.2.3 The preferred approach combines a range of generally positive ideas to ensure a sustainable and deliverable Waste Plan and when they are taken together they have an even greater positive effect on sustainability. However, there are a few matters where the approach may raise sustainability issues in relation to what is proposed in Policy Direction 1.
- 3.2.4 Firstly, there is an issue of the capacity that should be created within Greater Manchester. It is welcomed (and very positive) that Policy Direction 1 sets out the capacity gap for each type of facility if Greater Manchester are to be self-sufficient in the waste management over the plan-period and provides an indication of how many facilities will therefore be needed to meet this capacity.
- 3.2.5 However, the supporting text to the Policy Direction refers to the reality that some waste will be transported out of Greater Manchester for management and disposal (paragraphs 3.11 and 3.12) and recognises the need to make additional waste facility provision available should waste from the wider North West region need to be transported to Greater Manchester for disposal (which would have a negative local effect).
- 3.2.6 It is unclear whether Policy Direction 1 accounts for this cross-border movement of waste between Greater Manchester and the surrounding Authorities in its estimate of future capacity requirements and, therefore, the number of facilities required within Greater Manchester. This is a matter which should be clarified within the Policy Direction or its supporting text and, if needed and if it is possible, any estimate of increased / decreased capacity requirements in Greater Manchester as a result of this cross-border movement should be incorporated into the figures.
- 3.2.7 Secondly, in relation to this cross-border movement, there will usually be a negative effect on sustainability caused by the increased distances waste will be transported (the exception to this is where the facility is just across the border and could therefore be closer than some facilities within Greater Manchester from some sources of waste). However, it is recognised that this

cross-border movement can sometimes be the lesser of two evils in that it is better than forcing a facility into an inappropriate location simply to provide facilities locally within Greater Manchester. Having said that, mitigation for the negative effects of cross-border movement of waste because of transportation should be considered and included where possible.

- 3.2.8 Thirdly, there is a need for clarification of the issue regarding the number of facilities provided for within the Plan because the 2nd, 3rd and 4th bullet points under paragraph 3.3 are somewhat contradictory and it is not fully explained in this section which approach is being taken forward.
- 3.2.9 The Site Allocations section implicitly brings a degree of understanding on this issue, given that more than enough sites / areas are allocated for the minimum number of facilities, therefore leaving further sites should the need arise due to waste growth or other changes in future requirements. However, Policy Direction 1 appears an appropriate place to clearly set out the overall approach to allocating sites to avoid confusion, as this overall approach is not currently clear.
- 3.2.10 This overall approach appears to be a middle of the road approach that promotes the waste hierarchy, whereby the number of residual waste facilities is restricted to the minimum, which means that a larger allocation for other waste management facilities than the needs assessment suggests is required, hence the amount of land allocated within the site allocations is greater than the figures from the need assessment in Policy Direction 1. This approach does not expressly promote allocating sites for potential future increase in requirements, but by having the larger allocation the Plan may well be able to cope with a relatively small increase in requirements over the lifetime of the Plan.
- 3.2.11 This approach therefore only allocates the number of sites that covers the anticipated need (taking into account the fact that more waste management facilities than the needs assessment suggests may be needed, because of the promotion of the waste hierarchy), which will minimise the land-take allocated for waste management, encouraging other land-uses to be developed instead that could have any number of positive social, economic or environmental effects. It will also limit the potential for unnecessary waste facilities being built that may have localised negative effects on surrounding uses.
- 3.2.12 A further argument for this approach is that purposely building in additional allocations to the Plan as a fall-back 'just in case' recycling and recovery targets are not met would not be a positive message to send out and could, in itself, inadvertently encourage such a situation to arise, with its various negative effects on sustainability. This appears to be one of the rejected options in paragraph 3.5, and, from this perspective, it was correct to reject that option.
- 3.2.13 However, not allowing for unanticipated future increase in need could result in under-provision should requirements increase in the future, with no planned or allocated sites to promote to meet the increased need. This could result in unsustainable development of waste facilities on sites that are not the most appropriate available, but have been brought forward by applicants to meet the increased need at that time. The larger allocation (because of the need for more waste management facilities than the needs assessment suggests may be needed) will reduce this possibility, while minimising any negative effects of purposely building in too many allocations 'just in case'.
- 3.2.14 Policy Directions 2 and 3 build-in flexibility that may be required should future capacity requirements increase, as there are far more sites / areas included in Policy Directions 2 and 3 than will be needed for the minimum requirements, even taking into account the fact that some

sites may not be able to deliver the capacity expected of them. This flexibility is positive in that it gives the waste management sector choice and allows for some sites not being brought forward for reasons of deliverability, as well as leaving flexibility for unanticipated future increases in capacity requirements.

- 3.2.15 However, such flexibility must be closely monitored to ensure only those facilities required are delivered and to identify future increases in capacity requirements as soon as possible in order to plan in advance for these. With effective monitoring, this approach is very sustainable and prudent, but it should be included within a Policy Direction (and therefore the relevant policy in the final version of the Plan), so that it is clear such an approach is being followed and that all parties are aware of it and so that the approach is given the strongest possible weight in planning policy terms for when applications are submitted for individual sites. Such a policy should also specifically include the monitoring requirements to support this approach.
- 3.2.16 It is clear that both sides of the debate over whether to only promote the minimum requirement or whether to allow for additional allocations 'just in case' have positive and negative effects on sustainability. Therefore, a middle ground is needed that controls the negative effects on both sides of the debate. The Preferred Option attempts to reach this middle ground but it needs to be more explicit in its Policy Directions both in the Future Waste Management Requirements section and the Site Allocations section in order to clarify and achieve this and to be clear in what monitoring is required to manage this process.

3.3 Site Allocations

- 3.3.1 A further potential improvement to the Site Allocations section could be to introduce an element of ranking or priority to the site / area allocations given the number of sites / areas allocated to show which are considered most appropriate and most sustainable. The Bandings given to each site / area in the Site Appraisals could be used for this or those sites / areas that would fall within all of the spatial options could be promoted above the others.
- 3.3.2 This would not limit delivery to the most appropriate sites / areas but it would mean that, should an applicant want to bring forward one of the less suitable sites, they would have to justify why their site should be considered ahead of the more appropriate sites, introducing an element of sequential test. This would promote the most sustainable sites.
- 3.3.3 The decision to seek to combine the three spatial options when selecting sites to take forward, as recommended by the Stage 2 Issues & Options Interim SA Report, will have a positive effect as this will incorporate the positive effects of each option, while limiting the negative effects of each one. The positive effects of each of these options were discussed in the Stage 2 Issues & Options Interim SA Report and do not need repeating here.
- 3.3.4 However, one potentially important negative effect may still remain in that focusing all development of waste facilities in the locations where all three options overlap could result in negative cumulative effects from having several waste management facilities in one place, e.g. pressure on transport network, environmental effects and the image of the area. Therefore, as each development is proposed in a given location, the cumulative effect must be considered as part of the decision on the application and appropriate mitigation must be incorporated into proposals.

- 3.3.5 Policy Directions 2 and 3 briefly set out key requirements for the granting of planning permission for waste management development on the sites / areas allocated. While it is recognised that it is difficult to go into too much detail on such requirements given that the Plan covers 10 Local Authorities, each with their own slightly different requirements for planning applications, there is a need for a strategic, sub-regional document such as the Waste Plan to take more of a pro-active role in setting a consistent conurbation-wide context for decision-making on waste management development planning applications.
- 3.3.6 At the very least, the Waste Plan could raise the issues that Local Authorities should address with regard to such applications. This would inform development management policies as they are formed by each Authority as they prepare their Development Management DPDs (where they have proposed to prepare one), as well as create a reference framework for Local Authority Development Control Case Officers in deciding such applications.
- 3.3.7 The kind of issues to consider could be similar to those listed in paragraph 6.6 of the Development Management Section – it would just mean formulating the list within a policy to give it more weight. However, it is recognised that such a policy should not repeat what is, or will be, established within each Local Authorities planning policy (and should certainly not have the level of detail such policies have) and also needs to be consistent with what policy already exists within each Local Authority, a task that may be quite challenging.
- 3.3.8 The list of sites / areas in Policy Directions 2 and 3 could be improved by indicating which sites are suitable for meeting the different capacity gaps identified in the Future Waste Management Requirements. The Waste Technology Types in Table 3 are helpful but they do not directly link to the types of facility in Table 2 (Policy Direction 1), so it is difficult to assess which sites may contribute to meeting which capacity gap.
- 3.3.9 Site allocations for residual waste disposal facilities can raise many issues and are, necessarily, difficult facilities to find sites for, especially in a heavily urbanised area such as Greater Manchester. The Preferred Option sets out site allocations proposals for the three types of residual waste disposal: inert, hazardous and non-hazardous.
- 3.3.10 The future waste management requirements for inert residual waste disposal in Policy Direction 1 show that 6 such facilities are required immediately in order to meet the capacity gap. This suggests a shortage of facilities of this type within Greater Manchester at this time and suggests it is an area of concern that needs addressing relatively urgently. The preferred approach for this waste type is to not allocate any specific sites in the Waste Plan, because no suitable sites were put forward in the call for sites but also because there are ways of disposing of such waste without having a specific “landfill” site.
- 3.3.11 Therefore, the Preferred Option relies on suitable planning applications coming forward for such a facility and on 4 alternative methods of disposing of this type of waste:
- Disposal of inert waste at ‘exempt’ sites;
 - Use of inert material for engineering and daily cover in non-hazardous landfills;
 - Alteration of ground levels using inert waste, e.g. landscaping and agricultural improvements, regeneration schemes, equestrian facilities; and
 - Quarry restoration.

- 3.3.12 Planning applications given planning permission across Greater Manchester in the past five years for the disposal of inert residual waste have resulted in a capacity of more than twice the size of the identified capacity gap for inert residual waste, which demonstrates the capacity for disposing of inert residual waste in Greater Manchester without having to allocate specific sites, especially given the fact that the amount of such waste will hopefully be decreasing as recycling and reuse of such waste increases.
- 3.3.13 While such a strategy has its risks if no sites or applications come forward in the future, it is recognised that this is the best available approach and is broadly sustainable in that it will likely result in more reuse of inert residual waste on-site in new developments and disposal of inert residual waste within sites being improved for other purposes or developments, meaning that there will be few long-term specific “landfill” sites for inert residual waste.
- 3.3.14 However, it is recommended that this approach is formulated in a Policy Direction (and ultimately an actual policy) along with guidance on what Local Authorities should consider in planning applications of this sort and what Authorities should do if no such sites become available.
- 3.3.15 The Preferred Option does not set a strategy for hazardous residual waste disposal at this time given that no suitable sites have been put forward in the call for sites and because capacity in Greater Manchester is available until 2018. However, this will need reviewing, and a strategy preparing, by 2013 if no additional capacity has come forward.
- 3.3.16 Much of the disposal of hazardous residual waste is reliant on regional sites, such as those in Winsford and Skelmersdale. While this is appropriate from the perspective of it being very difficult to find suitable sites for this waste type, it will have a negative effect on the areas surrounding those sites (outside of Greater Manchester) and have negative effects due to the transporting of waste to those sites. If this approach is maintained within the future strategy for hazardous residual waste disposal, suitable mitigation should be set out in that strategy for the negative impacts caused by transporting waste larger distances.
- 3.3.17 The preferred approach for non-hazardous residual waste disposal seeks to utilise existing capacity as much as possible and then, primarily, seek extensions to those sites where appropriate. While completely new sites for this purpose are not ruled out, it is recognised that there are likely to be few suitable sites and any such sites that do come forward must demonstrate that they would have fewer social and environmental impacts than extending existing sites.
- 3.3.18 While this approach is not ideal, given the anticipated capacity gap from 2011 for this waste type, it is understandable that no suitable sites have been identified and the approach is as sustainable as possible, seeking to reduce further negative effects on sustainability from non-hazardous residual waste disposal. In preparing the Publication version of the Waste Plan, the specific policy that emerges from Policy Direction 4 could be enhanced by providing more detail on what will be required of such applications, especially with regard typical issues such sites cause locally and mitigation for these issues.

3.4 Development Management

- 3.4.1 As already discussed above, the Plan would benefit from a Policy that provides further detail on the kind of assessment criteria that should be applied by Local Authorities to waste facility planning applications. This could be incorporated into the Site Allocation Policy Directions referred to above or it could be a separate Policy Direction in the Development Management section.
- 3.4.2 Paragraphs 6.4 to 6.6 already discuss these issues, but lack weight because they are not formulated within an actual Policy Direction. It is recommended that such a policy is formulated based around the list of issues in paragraph 6.6 and on any design issues that are generally applicable to waste facilities.
- 3.4.3 Policy Direction 5 on Combined Heat & Power (CHP) has a positive effect on sustainability in that it promotes the use of waste to provide heat and power in a more sustainable way than fossil fuels do and reduces the level of waste going to landfill. However, there is a concern that the policy direction may result in too many CHP facilities.
- 3.4.4 Heat and power can be sourced from some waste management processes that seek to reduce quantity of waste or recycle it, such as Anaerobic Digestion, and, where possible, the heat and power generated as a by-product of these processes should be harnessed, which is the intention of the Policy Direction.
- 3.4.5 However, the Policy Direction could be misinterpreted to promote Thermal Treatment on any site that it is suitable. Thermal Treatment is a process which uses combustion or very high pressures to reduce large quantities of waste, but it is a process whose prime purpose is to produce heat and power and is not as environmentally-friendly as other waste management processes.
- 3.4.6 Policy Direction 1 only sets out a capacity requirement for 1 Thermal Treatment facility with energy recovery in Greater Manchester but there are 8 allocated sites and 1 allocated area that have the potential for Thermal Treatment facilities. Policy Direction 5 could be misinterpreted to encourage Thermal Treatment in all of these, which would result in too many Thermal Treatment facilities (which can have detrimental effects on surrounding areas) with only enough waste for 1 facility.
- 3.4.7 Policy Directions 6, 7 and 8 all have positive effects on the sustainability of the plan and on the sustainability of development in Greater Manchester. Policy Direction 6 (Restoration and Aftercare) ensures that, even though some waste facilities may have detrimental effects while in use, the long-term use of the site will be sustainable and will make a positive contribution to the surrounding area. Policy Direction 7 (Unallocated Sites) will ensure that planning applications for waste facilities on unallocated sites cannot simply circumvent the Waste Plan, but must demonstrate that they will contribute to the aims and objectives of the Plan better than existing allocated sites. Policy Direction 8 (Safeguarding) will ensure that allocated sites are not compromised for use for waste facilities by other new developments in the area, where it is appropriate to safeguard a site in this way. This will ensure sufficient allocated sites are safeguarded to enable the capacity gaps identified in Policy Direction 1 to be met.
- 3.4.8 Paragraphs 6.50 to 6.55 of this section discuss waste minimisation. As paragraph 6.52 states: "It would be difficult for a planning document to have much influence in minimising all waste streams" but the Waste Plan can influence waste minimisation in new development and the construction of new development, especially waste developments.

- 3.4.9 The Plan would benefit from a Policy Direction on this issue, to promote the waste hierarchy in the way that all new development is designed and constructed and how such developments should manage and dispose of their waste, especially during construction. This could include the requirement for Site Waste Management Plans in all waste-related developments, no matter what their overall financial value.
- 3.4.10 Such a policy would enable waste minimisation to be promoted in this way immediately upon adoption of the Plan, rather than have a further delay while more refined policies on waste minimisation are prepared as suggested in paragraph 6.55.

3.5 Monitoring & Implementation

- 3.5.1 As referred to above, monitoring of the implementation and evolving capacity requirements is crucial to the successful implementation of this Plan. As such, detailed proposals as to how this will be undertaken should be included in the Monitoring section of the final adopted Plan.

4 Recommendations & Mitigation

4.1 Summary of Effects of the Preferred Option

4.1.1 Overall, the proposals in the Preferred Option of the Waste Plan are broadly sustainable with positive effects outweighing negative effects. Where there are negative effects or improvements can be made, they primarily relate to how policy is formulated and whether it is worded strongly enough or includes sufficient detail to give it the necessary weight to ensure positive effects on the sustainability objectives.

4.1.2 In summarising the effects of the Preferred Option on the sustainability objectives, there are 3 broad types of effect that are most common:

- The impacts of proposals at a local level, both positive and negative

4.1.3 These tend to arise more from the site allocations or policy directions that set the strategy for locating sites. There are a number of effects that can arise locally due to new waste facilities but these will vary between sites. However, they will often revolve around the issues highlighted in paragraph 6.6 of the Preferred Option report.

- Transport Impacts

4.1.4 The proposed location of waste facilities will have a mixture of positive and negative effects on the sustainability objectives (especially SA Objectives 5 and 14) in relation to the impact of transporting waste to and from sites. The overall strategy for Built Facilities will likely have positive effects as sites are located with good accessibility to the strategy road network where possible and should utilise rail or water-based transport where possible. The proposals should not unduly affect overall levels of movement on the road network, as waste is already transported around Greater Manchester, they will merely redistribute where the movements take place.

4.1.5 The issues over whether waste will be transported into / out of Greater Manchester from / to other surrounding Authorities will also have a negative effect due to transportation, predominantly on air quality (SA Objective 14) and on the transport network (SA Objective 5).

- Overall Impacts of Sustainable Waste Management

4.1.6 The overall intent of the Waste Plan is to sustainably manage the commercial waste produced in Greater Manchester by promoting the waste hierarchy in planning policy and allocating suitable land resources to recycle / re-use waste, recover energy from it and, as a last resort, dispose of any remaining waste in a sustainable manner. Therefore, there is an over-arching positivity about the Waste Plan in that it is seeking to achieve these sustainable aims and this relates directly to SA Objective 19. All other effects on sustainability primarily lie in how the details of such a strategy are implemented in a local context on a site-by-site basis and could affect a range of SA Objectives.

4.2 Potential Alterations to the Plan & Mitigation

4.2.1 Emerging from the assessment above, there are improvements and alterations that could be made to the Preferred Option or mitigation that should be put in place (either in policy or elsewhere) to make the final Plan more sustainable.

4.2.2 One of the key recommendations of this type is that regarding monitoring. It is essential that appropriate monitoring is put in place in the Final Waste Plan to update the needs assessment and capacity gap as development takes place and the site allocations are implemented and in light of demand for waste management as the amount of waste produced changes over time in Greater Manchester. Monitoring should also be used to help learn lessons from implementing specific allocations or development management policies to identify unforeseen issues and then cater for them in later development proposals.

4.2.3 Other recommendations include:

- Provide clarity on what waste will be transported into / out of Greater Manchester and how this will affect the number of facilities required – should cross-border transportation of waste between Greater Manchester and neighbouring authorities take place, mitigation should be identified for the negative effects on air quality and the transport network as a result of this
- Provide clarity in Policy on whether the Waste Plan is pursuing a minimum number of facilities approach or an allocation to meet anticipated future growth approach and ensure that Allocation Policies demonstrate how they fulfil the approach, especially given the large number of sites allocated – this may include ranking the sites using the Site Appraisal Sustainability Banding as to which allocations will be given favour for implementation.
- Provide monitoring of cumulative effects in a given area where several allocations are proposed and identify suitable mitigation should it become necessary.
- Include within policy the issues that should be considered in assessing a planning application for a waste management or disposal facility and provide guidance as to how those issues should be considered to encourage a consistent approach to deciding waste-related planning applications across the 10 Greater Manchester Authorities.
- It would be helpful to link waste technology types to the different capacity gaps identified to assess how the site allocations may contribute to meeting those capacity gaps and thus provide a basis for future monitoring of the capacity gap as allocations are implemented.
- Formulate the Plan's approach to inert residual waste within policy, to provide greater weight when considering planning applications and to provide guidance on what Authorities should do if no sites come forward that are suitable.
- Mitigation should be identified for the negative effects on air quality and the transport network as a result of the transportation of hazardous waste outside of Greater Manchester.
- Improve Policy Direction 4 in relation to non-hazardous residual waste disposal by providing more detail on what will be required of applications for such facilities, especially with regards to typical issues they cause locally and mitigation for this.

- Refine Policy Direction 5 on CHP to ensure that it is clear only one Thermal Treatment facility will be sought, in line with the capacity gap identified in Policy Direction 1.
- Provide a Policy on waste minimisation to formalise and give weight to the consideration of this important issue already given in Paragraphs 6.49 to 6.55 of the Preferred Option report.