

**GREATER MANCHESTER JOINT WASTE
DEVELOPMENT PLAN DOCUMENT**

**All Publication Responses Received
1st November– 13th December 2010**

Unique ID	Ref	Organisation	Representation in relation to:	Details of why the Waste Plan is not considered legally compliant or is unsound.	Change(s) considered necessary to make the Waste Plan legally compliant or sound,
494713	1	Environment Agency	Waste Plan: Publication DPD		
344481	1	Network Rail	Waste Plan: Publication DPD		
31218	1	Viridor Waste Management	Waste Plan: Publication DPD		
419082	1	Margaret Bruce	Waste Plan: Publication DPD	There are no details of what should a Waste Plan involve. Without these it is useless	
494851	3	Planning and Conservation Adviser Natural England	Waste Plan: Publication DPD Executive Summary	Whilst we do not consider the DPD to be unsound, we note that the Executive Summary incorrectly references the section numbers throughout the DPD. Section 1 is referred to as Section 2; Section 2 is referred to as Section 3 and so on.	
494851	1	Planning and Conservation Adviser Natural England	Chapter 1: Aim and Objectives Aim: Paragraph 1.23	While we do not consider the Aim to be unsound, we would welcome greater reference to the need to preserve and enhance the natural environment within this paragraph. We also recommend that the text is amended to recognise that adverse impacts should be avoided where possible, before being mitigated. Our recommended wording for this paragraph is: "The process of site identification for the Waste Plan should seek to ensure that sites/areas identified for waste facilities are in the right locations based on an understanding of known constraints, where any detrimental impacts can firstly be avoided and where such impacts cannot be avoided they can be mitigated to an acceptable level and balanced against the overall demand for the development."	Our recommended wording for this paragraph is: "The process of site identification for the Waste Plan should seek to ensure that sites/areas identified for waste facilities are in the right locations based on an understanding of known constraints, where any detrimental impacts can firstly be avoided and where such impacts cannot be avoided they can be mitigated to an acceptable level and balanced against the overall demand for the development."
494851	2	Planning and Conservation Adviser Natural England	Chapter 1: Aim and Objectives Aim: Paragraph 1.25	While we do not consider the Aim to be unsound, we are disappointed that our previous recommendation has not been incorporated, and that the Aim continues to make no reference to the need to preserve or enhance the natural environment.	
494996	2	Development Surveyor Ainscough Strategic Land	Chapter 1- Aims and Objectives	The Aim of the Waste DPD is clear and achievable, and will allow for new waste management facilities to come forward, as required, during the plan period. No amendments to the Aim of the Plan are therefore proposed by ASL. The objectives of the Plan reflect national policy set out within a range of strategic documents, including the Waste Strategy 2007 and Renewable Energy Strategy 2009, and national planning policy set out in PPS1, PPS10 and PSS22. The movement of waste up the waste hierarchy is in accordance with EU Waste Framework Directive 2006/12/EC, the principal objective of which is to reduce the amount of waste that is sent to landfill. Energy recovery from waste is widely recognised as having a vital role to play in contributing towards a reduction in greenhouse gas emissions, and therefore ensuring a flexible approach to the type of facilities to be delivered through the Waste DPD will be essential to allow new and emerging technologies to come forward.	

494996	3	Development Surveyor Ainscough Strategic Land	Chapter 1- Aims and Objectives	<p>Within paragraph 1.36, reference is made to PPS10 and promoting the transportation of waste by modes other than road. This includes the movement of freight by rail and water. Notwithstanding this, there is recognition that road transport will remain an important method of transporting waste in Greater Manchester. This approach is supported by ASL. Clifton Industrial Estate, whilst undoubtedly representing a suitable location for waste management facilities given its physical and locational characteristics, presents limited opportunity to secure access other than by road. However, when balanced against the area's wider attributes, and the investment in seeking to consistently improve vehicular access to the area, this should not therefore be seen as representing a constraint to its development for waste management facilities, subject to demonstrating the ability to secure suitable road access via the strategic highway network as part of any planning submission. Clifton Industrial Estate is also easily accessible by public transport. The site entrance currently serves as a frequent passenger bus terminus, whilst Clifton rail halt currently still operates as a passenger station on a daily basis. The opportunity for people to access the site via public transport represents a significant benefit, and during construction and operation would serve to reduce the number of private car movements to the site, and on the strategic road network.</p>	
494996	1	Development Surveyor Ainscough Strategic Land	Paragraph 1.12	<p>Paragraphs 1.12 and 1.13 of the Plan recognise that economic growth is a key priority in ensuring the continued development of the sub-region. The Plan acknowledges that investment in new technologies for dealing with waste have an important role to play in this process, generating a significant number of 'green collar' jobs which will require a broad range of skills. As part of the economic growth strategy, and given the emergence of new waste technologies, paragraph 1.13 states that "the Waste Plan must therefore allocate sites for a range of waste facilities including those for recycling, treatment, processing and recovery." This strategic approach is supported by ASL. However, the Plan in allocating sites (and areas) for specific waste management facilities should equally retain a sufficient degree of flexibility to allow for emerging new technologies to come forward on the allocated sites and areas during the plan period to facilitate the delivery of new waste management and environmental technologies. Clifton Industrial Estate has historically represented one of Salford's employment and economic drivers, employing thousands of people in industrial occupations for well over a century. It is therefore well placed to continue to facilitate economic growth within the sub-region through the diversification of end-uses, including waste management facilities.</p>	
494996	4	Development Surveyor Ainscough Strategic Land	Paragraph 1.36	<p>National planning policy, in the form of PPS10, promotes the co-location of waste management facilities with complementary activities, thus minimising the environmental impacts of new development by providing facilities close to existing operations where compatible waste uses can be developed. It is noted that reference to PPS10 and the benefits of co-location is made in paragraph 1.40 of the Plan. Clifton Industrial Estate, as an existing industrial area, represents an excellent area in which to co-locate new waste management facilities given the availability of and proximity to commercial and industrial waste arisings, and thus is able to demonstrate compliance with and draw support from PPS10.</p>	

494996	5	Development Surveyor Ainscough Strategic Land	Paragraph 1.4	<p>Section 2.2 of the Plan identifies the need for a total of 5.2 million tonnes of energy recovery capacity between 2012 and 2027. Depending on facility capacity, it is anticipated within the Plan that this will be provided at up to 3 larger facilities (each with a capacity of c. 120,000 tonnes per annum (tpa), or a maximum of five smaller energy recovery facilities (each with a capacity of c.75,000tpa). It is accepted within the Plan that there is a need for new waste management facilities to come forward during the plan period to maximise energy recovery. However at present, the Plan is considered by ASL to be overly restrictive by placing a cap on the number of larger and smaller energy recovery facilities to be delivered. This appears to conflict with the flexibility afforded by the Aim and Objectives of the plan. It is therefore requested that this wording be amended to afford more flexibility to the number of energy recovery facilities to be developed across Greater Manchester by replacing "up to" and "maximum" with "approximately." This is perhaps even more pertinent given that paragraph 2.33 of the Plan, which refers to "Commercial and Industrial Waste: Energy Recovery Capacity Requirements," recognises that the level.</p>	<p>The Waste DPD, in its current form, offers limited flexibility in relation to the development of additional energy recovery facilities across the plan period. This is not considered to afford sufficient flexibility required to allow the Authorities to respond to any potential changing circumstances and waste management needs which may arise between 2012 and 2027. Greater flexibility should therefore be applied to the number of energy recovery facilities which could come forward during the plan period.</p>
490896	2	Sky Properties	Chapter 2- Paragraph 2.2	<p>The full text of the response in relation to Policy 4 is set out in addressing the table of allocations. It states that the policy is unsound due to the exclusion of site SL11 Mitchell Shackleton.</p>	<p>Site SL11 Mitchell Shackleton should be included as a site allocation.</p>
490896	3	Sky Properties	Chapter 2- Paragraph 2.27	<p>As noted above the difference between capacity and throughput is striking in terms of waste treatment. The reasons for this are not made explicit in the plan and it is assumed that all of this capacity is available.</p>	<p>The plan or its evidence base needs to be more transparent in terms of the estimate of treatment capacity.</p>
490896	4	Sky Properties	Chapter 2- Paragraph 2.32	<p>The specific waste requirements are derived from the needs assessment dated April 2010 and what is striking about the data is the estimate of capacity requirements. So for example, waste treatment throughput (excluding recycling) is estimated at 216 000 tonnes for 2009 whilst capacity is shown at 1.4 million tonnes; waste transfer is shown as 1.8 million tonnes with capacity at 8.7 million tonnes; and recycling at 1.1 million tonnes with a throughput of 2.4 million tonnes. This suggests that there is either significant capacity that has come on-line but is not operational; or existing facilities are operating well below their capacity. The capacity data needs to be re-assessed or made more explicit.</p>	<p>The waste capacity information needs to be made explicit in the evidence base to justify the significant variation between throughputs and capacities. At the same time the Environment Agency data for 2009 is soon to be published in full and should be assessed in the evidence base by way of an update.</p>

216729	1	Estates Surveyor Peel Holdings (Environment) Ltd	Policy 1- Commercial and Industrial Waste-Energy Recovery	Peel Environmental Ltd considers that this policy and the reasoned justification (paragraphs 2.34 - 2.37) provides sufficient clarity and flexibility to meet the energy recovery capacity over the plan period. Peel Environmental Ltd considers that expressing the required capacity in tonnes per annum enables the required number and scale of facilities to be flexible to meet these requirements. As expressed at paragraph 2.36, reference is also made to the energy recovery facility at Ince Marshes. As the waste plan team is aware, this site is being developed by Ince Park LLP (a joint venture partnership between Peel Environmental Ltd and Covanta Energy Ltd). As such, we would be happy to continue to assist with providing further information regarding the development and availability of the facility, as and when appropriate.	
490896	1	Sky Properties	Policy 4- Site Allocations Site Allocation SL11:Michell Shackleton, Salford	Introduction Sky Properties strongly object to the exclusion of site SL11 Mitchell Shackleton as an allocation from Policy 4 of the DPD and to the reasons for its exclusion. Salford CC's contention is that the allocation is "premature as the future regeneration plans for the area are unknown". The site comprises a combination of retained and allocated employment land and bringing the site forward for development would contribute to regeneration. Planning applications have been submitted to the Council for the development of recycling, anaerobic digestion and energy from waste (July 2010 and as yet undetermined). These uses would contribute to the local economy, generate employment, support local businesses and provide opportunities for CHP. Indeed the applications have received support from the Greater Manchester Chamber of Commerce and the North West Institute of Directors. The landowner, Sky Properties, has secured the support of the local gasification technology provider ENERGOS in providing an advanced thermal treatment solution on the site; and also that of the local waste management contractor, JWS, who are interested in developing a materials recycling facility and relocating part of their existing operations in Salford to the site.	The allocation of SL11 Mitchell Shackleton as a site allocation in Policy 4 for all enclosed waste facilities.

31327	1	The Emerson Group	Policy 4- Site Allocations Site Allocation BL9 Watersmeeting South C Triangle	<p>The Waste Plan is not sound because it is not appropriate to locate this waste facility allocation in close proximity to a new employment facility which needs to attract investment and is recognised in the Waste Plan as a high end industrial development. It would be more appropriate for the site to be used for B1/B2/B8 employment allocated in the UDP. In terms of employment, waste management facilities generally have fewer staff in comparison to other B1/B2/B8 facilities that can be located on a business park such as this. Alternative B1/B2/B8 tenants which employ more staff could be deterred from locating on this allocated business park by the prospect of this facility being located there. Being adjacent to a watercourse and reservoir the risk of contamination of water sources appears greater here than other sites proposed in the wider area. A green corridor lies to the east and south of the site and any proposals for the site should continue the green link between the north and south of Watersmeeting Road and screen the proposal from the green chain to the east and south through effective landscaping. The site is heavily treed and if an MBT were provided on site there would be ecological wildlife issues to address. This site is prime undeveloped employment land suitable for B1/B2/B8 purposes and the proposal would underutilise the potential of the site. Seven sites have been identified for anaerobic digestion and five sites for mechanical biological treatment facilities, two of which are in Bolton. They should be spread around the Greater Manchester area and two should not be provided in such close proximity to each other. Four of the seven sites allocated for waste management are in Band C in terms of their sustainability appraisal and are therefore potentially not going to be able to come forward because of the significant planning issues that would require significant mitigation. Therefore only three of the seven sites have a strong potential to come forward and it should be those sites which are allocated, not those in Band C. Emerson welcome the changes that have been made as a result of their last representations in respect of the recognition that the site is unsuitable for open waste treatment facilities and the inclusion of the reference to a small enclosed facility being appropriate, but Emerson still maintain that the site should not be allocated for a waste management facility for the reasons stated above. The traffic generated by a waste management facility will be heavy goods vehicles and refuse collection vehicles which themselves are smelly and noisy. These will pass through the Valley Business Park along Watersmeeting Road which is not appropriate in a business park and will be a disincentive to development.</p>	<p>Removal of site BL9 from the list of allocated waste sites. If that is not possible, removal of MBT from appropriate uses on the site.</p>
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31327	2	The Emerson Group	Policy 4- Site Allocations Site Allocation BL9 Watersmeeting South C Triangle	<p>The Waste Plan is not sound because it is not appropriate to locate this waste facility allocation in close proximity to a new employment facility which needs to attract investment and is recognised in the Waste Plan as a high end industrial development. It would be more appropriate for the site to be used for B1/B2/B8 employment allocated in the UDP. In terms of employment, waste management facilities generally have fewer staff in comparison to other B1/B2/B8 facilities that can be located on a business park such as this. Alternative B1/B2/B8 tenants which employ more staff could be deterred from locating on this allocated business park by the prospect of this facility being located there. Being adjacent to a watercourse and reservoir the risk of contamination of water sources appears greater here than other sites proposed in the wider area. A green corridor lies to the east and south of the site and any proposals for the site should continue the green link between the north and south of Watersmeeting Road and screen the proposal from the green chain to the east and south through effective landscaping. The site is heavily treed and if an MBT were provided on site there would be ecological wildlife issues to address. This site is prime undeveloped employment land suitable for B1/B2/B8 purposes and the proposal would underutilise the potential of the site. Seven sites have been identified for anaerobic digestion and five sites for mechanical biological treatment facilities, two of which are in Bolton. They should be spread around the Greater Manchester area and two should not be provided in such close proximity to each other. Four of the seven sites allocated for waste management are in Band C in terms of their sustainability appraisal and are therefore potentially not going to be able to come forward because of the significant planning issues that would require significant mitigation. Therefore only three of the seven sites have a strong potential to come forward and it should be those sites which are allocated, not those in Band C. Emerson welcome the changes that have been made as a result of their last representations in respect of the recognition that the site is unsuitable for open waste treatment facilities and the inclusion of the reference to a small enclosed facility being appropriate, but Emerson still maintain that the site should not be allocated for a waste management facility for the reasons stated above. The traffic generated by a waste management facility will be heavy goods vehicles and refuse collection vehicles which themselves are smelly and noisy. These will pass through the Valley Business Park along Watersmeeting Road which is not appropriate in a business park and will be a disincentive to development</p>	<p>Removal of site BL9 from the list of allocated waste sites. If that is not possible, removal of MBT from appropriate uses on the site.</p>
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31327	5	The Emerson Group	Policy 4- Site Allocations Site Allocation BL9 Watersmeeting South C Triangle	<p>The Waste Plan is not sound because it is not appropriate to locate this waste facility allocation in close proximity to a new employment facility which needs to attract investment and is recognised in the Waste Plan as a high end industrial development. It would be more appropriate for the site to be used for B1/B2/B8 employment allocated in the UDP. In terms of employment, waste management facilities generally have fewer staff in comparison to other B1/B2/B8 facilities that can be located on a business park such as this. Alternative B1/B2/B8 tenants which employ more staff could be deterred from locating on this allocated business park by the prospect of this facility being located there. Being adjacent to a watercourse and reservoir the risk of contamination of water sources appears greater here than other sites proposed in the wider area. A green corridor lies to the east and south of the site and any proposals for the site should continue the green link between the north and south of Watersmeeting Road and screen the proposal from the green chain to the east and south through effective landscaping. The site is heavily treed and if an MBT were provided on site there would be ecological wildlife issues to address. This site is prime undeveloped employment land suitable for B1/B2/B8 purposes and the proposal would underutilise the potential of the site. Seven sites have been identified for anaerobic digestion and five sites for mechanical biological treatment facilities, two of which are in Bolton. They should be spread around the Greater Manchester area and two should not be provided in such close proximity to each other. Four of the seven sites allocated for waste management are in Band C in terms of their sustainability appraisal and are therefore potentially not going to be able to come forward because of the significant planning issues that would require significant mitigation. Therefore only three of the seven sites have a strong potential to come forward and it should be those sites which are allocated, not those in Band C. Emerson welcome the changes that have been made as a result of their last representations in respect of the recognition that the site is unsuitable for open waste treatment facilities and the inclusion of the reference to a small enclosed facility being appropriate, but Emerson still maintain that the site should not be allocated for a waste management facility for the reasons stated above. The traffic generated by a waste management facility will be heavy goods vehicles and refuse collection vehicles which themselves are smelly and noisy. These will pass through the Valley Business Park along Watersmeeting Road which is not appropriate in a business park and will be a disincentive to development</p>	<p>Removal of site BL9 from the list of allocated waste sites. If that is not possible, removal of MBT from appropriate uses on the site.</p>
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31339	4	Regional Planner English Heritage	Policy 4- Site Allocations Site Allocation W4: CA Site Makerfield Way, Wigan	<p>Comments relate to Policy 4 Site W4 PPS5 Planning for the Historic Environment sets out the Government's objectives and policy for the conservation, enhancement and enjoyment of the historic environment. Policy HE10 covers the setting of designated heritage assets. Annex 2 defines setting and the Practice Guide provides further guidance. Hindley Hall, a Grade II Listed Building lies to the North East of Site W4. The Appendix 1 site profile fails to identify the setting of this listed building as a key issue or whether this has been considered.</p>	The site profile should highlight the need to preserve those elements of the setting of Hindley Hall which make a positive contribution to its significance and that opportunity should be taken to enhance its setting.

450930	1	Area Planner British Waterways	Policy 5- Area Allocations	Policy 5 Area Allocation W1a Miry Lane Employment Area, Wigan The following comments are made by British Waterways as landowner and navigation authority for the Leeds and Liverpool Canal, and as landowner of part of the allocated area. Please note that they are not considered to be issues of overall soundness or otherwise of the Publication DPD. British Waterways does not object to the proposed area allocation W1a Miry Lane Employment Area on the basis this is not a restrictive allocation, i.e. other uses will be allowed within the allocated area. We would object if the area was to be safeguarded for waste uses only. No details or descriptions for the area allocations are provided within the DPD - we assume these will be provided separately. We are concerned that the current summary sheet for this area allocation provided with the DPD consultation makes limited reference to the canal and none at all to British Waterways. Any information of this nature provided with the DPD should at the least include the following: Under proximity to sensitive receptors, this should refer to canal and towpath users as well as residents of housing. That any development will need to take into account the need to protect the canal from pollution.	
292601	1	CPD Land Agents	Policy 5- Area Allocations OL3 Land off Higginshaw Lane	Support inclusion of OL3 as an area allocation. Would like to be made aware of the submission and examination stages of the Plan.	
489679	2	Brimrod, Sudden & Marland Area Forum	Policy 5- Area Allocations RD6 Mandale Park, Rochdale	Area Allocation RD6: Mandale Park Too close to schools. Entrance and exit roads between schools and using Manchester Road for even more traffic Adding at least one more set of lights to a road that already is very busy	I would like to find out more about what happen, not a lot of maybe's. I am representing quite a large area and feel unable to explain to people what is going to happen. As most of the question at the meeting where met with 'we don't know yet' or blinded with gobbledygook which went over most peoples heads. Please speak in laymans terms at future meetings as I'm sure there will be many.
490489	1	Brimrod Residents and Tenants Association	Policy 5- Area Allocations RD6 Mandale Park, Rochdale	Area Allocation RD6: Mandale Park. No consultation has taken place with local residents from the outset. The policy clearly states this should of been done. Was told when asked why this has not been done I was told township was informed. I spoke to Stuart Heys our township officer and he told me he new nothing about it up until a few weeks ago. Stuart has done his own investigation and township has not been informed of any Waste Plan at Mandale Park. I will use him as my evidence. My second concern is the pollution survey done A627M and not at the busiest junction at Sudden, where all waste vehicles will pass through from all surrounding areas, to be stood in stationary traffic this is where most of the pollution will be created. On top of the pollution from the waste plant itself, this means Brimrod and Sudden will get higher levels of pollution. My third concern is the plans to build the road through the middle of Mandale Park this means there would be no park left and could no longer be known as a park. This road would be too near the local school and hospital. This would have a great impact on the local area.	Start the full proposal from the beginning and involve residents in the local area regarding pollution and the road through Mandale Park. Do pollution tests at Sudden junction.

494996	1	Deployment Limited	Policy 5- Area Allocations RD6 Mandale Park, Rochdale	Area Allocation RD6: Mandale Park. The new access road will join an already busy junction. Heavy vehicles using the access road will emit fumes which will directly affect the local school and residents. Mandale Park is a park and as such it is a recreational area used by local residents and during school holidays particularly children. Increased volume of traffic increases the risk to children coming to/leaving school. There is also an abundance of existing wildlife, e.g. deer in the park	
31587	1	Headmaster Beech House School	Policy 5- Area Allocations RD6 Mandale Park, Rochdale	Policy 5 RD6 Mandale Park Lease Land included within allocation can not be used to build on, as per lease agreement with Rochdale Council Consultation with all interested parties should be carried out The access road should not be put next to a school with large vehicles parking at traffic lights next to the school playground.	
491303	1	Councillor Ian Duckworth	Policy 5- Area Allocations RD6 Mandale Park, Rochdale	Policy 5 RD 5 There has been no community involvement during all stages of the Plan (Mandale Park). Rochdale MBC is divided into Townships, which are used in all consultation. This Plan has not been to any township. Furthermore, Ward Forums are used at the next level for consultation. This Plan has not been to any. Throughout Rochdale and the respective wards affected by the Waste Plan the vast majority of local people have had no official consultation from the GMGU, Rochdale Township and the various forums. Other than the small amount of local people I have informed. Within the local planning authorities LDF, Development Plan Documents and Statements of Community Involvement must be sound (Section 20 of the 2004 Act) both in terms of their content and the process by which they are produced they must also be founded on a robust and credible evidence base. I state again, there has been no community involvement.	We need full public consultation so residents have the opportunity to give their views. They cannot have an opinion on something they know nothing about.
494363	1	Ms Susan Bermingham	Policy 5- Area Allocations RD6 Mandale Park, Rochdale	The Waste Management plan is not sound as participation of the local community has not been sought. The local community living at Beechwood Gardens, Rochdale are on land adjacent to Mandale Park. Houses at the head of the three cul de sacs (Lower Beechwood Gardens, Convent Grove & Pallotine Walk) share land boundaries with Mandale park. Their land goes beyond their back fences down the slope into Mandale Park. Quoting from the Borough Solicitor 16 the October 1996 in a letter to the Pallottine Missionary Sisters. 'There are numerous trees between the 3 storey convent home and the extensions to Highfield Hospital. A number also lie to the rear of the 2 storey Victorian Infant building, beyond which is a steep, densely wooded drop to Mandale Park.' This is a unique area by reason of its size and the large numbers of mature trees contained within it; in a well maintained setting in close proximity to the town centre. The trees offer visual relief between the adjacent residential and commercial interests. The trees also attract local wildlife, particularly given the large numbers and location adjacent to the River Roch valley and the Green Space Corridor formed nearby in part by Mandale Park.' Calling on neighbours over the weekend of the 5- 6th the Dec the majority were unaware of any Waste Management plans. Twenty Seven residents have signed a petition highlighting that their views had not been sought (see enclosed).	The local community at Beechwood gardens needs to be involved - their voice and opinions sought. There needs to be community involvement in this exemplar of place management. Participatory Appraisal tools (community walk, mapping, timeline etc) should be used to seek out the communities attachment and views about Mandale Park. Translation of the plan should be available to local residents whose first language is not English. A newspaper article in a local paper weeks before the deadline is not the best way to seek local views. The Green Space corridor prized by the Borough Solicitor in 1996, is prized by the locals at Beechwood Gardens. The residents purchased their homes next to a former landfill site, in the full understanding that its new use was as a park, part of a Green Space Corridor.

31339	5	Regional Planner English Heritage	Policy 5- Area Allocations Area Allocation TR17: Land at Trafford Park, Trafford	Comments relate to Policy 5 Area TR17 PPS 5 Planning for the Historic Environment sets out the Governments objectives and policies for the conservation enhancement and enjoyment of the historic environment Policy HE10 covers the setting of designated heritage assets, Annex 2 defines setting and the Practice Guide provides for the guidance. The Grade II* Listed Building All Saints Presbytery on Radcliffe Road lies at the western tip of the site. The setting of this Listed Building is not identified as a Key Issue in the Site Profile, where as the SBI is included as a constraint. The site profile should address potential impacts on the setting of the listed building and identify any appropriate mitigation.	The site profile should refer to the nearby listed building and include it as an issue of concern in the Key Issues box. Opportunities to enhance the setting should be exploited.
31339	3	Regional Planner English Heritage	Policy 5- Area Allocations Area Allocation TR18b:Carrington Area part B Carrington Vehicle Storage Works, Trafford	Comments relate to Policy 5 Area TR18b PPS5 sets out the governments objectives of policies for the conservation, enhancement and enjoyment of the historic environment and heritage assets. Policy HE10 covers the setting of designated heritage assets Annex 2 defines setting and the Practice guide provides further guidance. The Grade II* listed Church of St George lies immediately to the north of the site TR18b. Whilst the site profile identifies several SBIs close by it does not refer to the Church. The setting of the Church must be assessed and any development of the site should preserve and enhance its setting.	The site profile should identify the setting of the II* Church as a key issue. The setting of the Church should be preserved and enhanced. Opportunities to enhance the setting should be exploited.
31339	6	Regional Planner English Heritage	Policy 5- Area Allocations Area Allocation W13a: Martland Park, Wigan	Comments relate to Policy 5 Area W13a PPS5 sets out Government policy for the conservation enhancement and enjoyment of the historic environment and heritage assets. Policy HE10 covers the setting of designated heritage assets Annex 2 defines setting and the Practice Guide provides further guidance. The Grade II* Listed Ackhurst Hall lies to the north west of the site. The setting of the Hall should be assessed and any development at site W13a should preserve and enhance its setting.	The site profile should identify the setting of the II* Hall as a key issue. The setting of the Hall should be preserved and enhanced. Opportunities to enhance the setting should be exploited.
31339	2	Regional Planner English Heritage	Policy 5- Area Allocations Area OL1: Land off Higginshaw Lane, Oldham	Comments relate to Policy 5 OL1 PPS5 Planning for the Historic Environment sets out the Government's objectives and policy for the conservation, enhancement and enjoyment of the historic environment and heritage assets. Policy HE10 covers the setting of designated heritage assets, Annex 2 defines setting and the Practice Guide provides further guidance. The Grade II listed former board school adjoins the southern boundary of the site at Shaw Road. The site profile does not identify this listed as a key issue, whilst it does include an SBI as a major issue of concern. The site profile should address impacts on the listed building and include the need to address these before any particular use is taken forward, reflecting the approach taken to the SBI.	The site profile should refer to the adjoining listed building and include it as a major issue of concern in the second paragraph of the key issues box. Opportunities to enhance the setting should be exploited.
31339	1	Regional Planner English Heritage	Policy 5- Area Allocations Area SL3: Cobden Industrial Estate, Salford	Comments relate to Policy 5 Site SL3 - PPS5 Planning for the Historic Environment sets out the Government's objectives and policy for the conservation, enhancement and enjoyment of the historic environment and heritage assets. PPS5 Policy HE7.4 includes policy principles which local planning authorities should take into account and policy HE10 covers the setting of designated heritage assets. Site SL3 includes 2 Grade II listed buildings on Broughton Road, the Maypole Public House and the Pendleton Co-Operative Industrial Society Buildings. The site profile does not identify these listed buildings as a key issue nor the special considerations needed when planning for the area. It is not clear why they are included in an area allocation for waste management development.	The CS should exclude the listed buildings from the area allocation for waste management development. In addition, the site profile should identify them as a sensitive receptor in the Key Issues box. Appropriate mitigation measures should be incorporated to preserve and enhance their setting. The adaptive re-use of the buildings could be encouraged in line with PPS5 Policy HE1, HE3.1. Opportunities to enhance the setting should be exploited.

494996	6	Development Surveyor Ainscough Strategic Land	Policy 5- Area Allocations: Area Allocation SL2 Clifton Industrial Estate	<p>It is understood that an assessment has been undertaken of the potential facility types which could be suitable on each site and within each area. It is acknowledged within paragraph 3.8 of the Plan that this process has been based on information available at the time of the assessment. The Plan therefore recommends that a full assessment of the suitability of each site and area for a facility type should be undertaken by the developer as part of any planning application. Accordingly, the list of proposed facilities is only intended to be indicative at this stage, with developers required to prove the suitability of any development proposals which they seek to promote. Further to this, Policy 5 of the Plan list a number of areas within Greater Manchester considered suitable for waste facilities. This generally encapsulates a number of combined sites, and includes allocation SL2 'Clifton Industrial Estate' which comprises the c. 18 hectare parcel of land in the ownership of ASL. Policy 5 identifies the type of 'open' and 'enclosed' waste facilities which are deemed suitable for development within each area. Whilst the flexibility offered by paragraph 3.8 is welcomed, it is questionable how robust the judgement that Clifton Industrial Estate is not suitable for Open Windrow Composting, Conventional Thermal Treatment and Advanced Facility Thermal Treatment is at this stage without the benefit of a detailed assessment of their potential impacts. Despite this lack of supporting evidence, the site has still been found to be suitable for 6 other types of facilities relying upon professional judgement. The approach to establishing the suitability of areas does not appear wholly consistent across the Plan, as other areas are found to be suitable for those waste facilities which Clifton Industrial Estate is not, despite the judgement of suitability presumably having been taken based upon a comparable level of detail and information currently available for Clifton Industrial Estate. Given the accepted need for new energy recovery facilities, the Plan should therefore afford as much flexibility as possible to the Clifton Industrial Estate given its undoubted credentials and ability to accommodate (subject to an assessment of potential impacts) those uses for which it is currently excluded. ASL therefore asks that Clifton Industrial Estate be identified as a suitable location for the waste management facilities for which it is currently deemed unsuitable, particularly Conventional Thermal Treatment and Advanced Facility Thermal Treatment. The reasoned justification which accompanies Policy 5 (paragraph 3.17) states that the purpose of this policy is to "provide additional choice to developers/investors for new, unidentified waste management technologies." Policy 4 on the other hand, which identifies specific sites, is intended to provide for the "waste management facilities needed to meet the capacity requirements set out in the DPD." It is understood that the allocation of areas under Policy 5 is designed to supplement the allocation of sites under Policy 4 to accommodate new unidentified waste management technologies. Whilst this flexibility is welcomed, those sites identified under Policy 4 should not be afforded hierarchical preference.</p>	<p>The allocation of sites and areas for specific uses has been based on professional judgement based on a site's physical and locational credentials. However, there appears inconsistency within the Publication Waste DPD, with some site's/area's which score a Sustainability Appraisal ranking of B allocated for all types of waste management facilities, whilst others are not despite this judgement understood to have been taken based upon a comparable level of environmental and technical information. The ability or otherwise of a site to accommodate a specific waste management facility should therefore be based upon detailed and robust evidence of potential impacts.</p>
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494996	9	Development Surveyor Ainscough Strategic Land	Policy 5- Area Allocations: Area Allocation SL2 Clifton Industrial Estate	<p>Area Allocation SL2 Clifton Industrial Estate, Salford Appendix A of the DPD contains a profile of all sites and areas identified for inclusion within the Plan, and in doing so confirms the Sustainability Appraisal ranking of each site and area. For Clifton Industrial Estate, the area is ranked as Band B. This banding is afforded to those sites identified as having several issues which, if the site were to be developed for a waste management facility, would require mitigation. However, Band B sites are identified as generally suitable for waste management facilities if these issues can be addressed. Whilst ASL has no reason to question the area's Sustainability Appraisal ranking, it is noted that a number of other areas identified within the Plan (with a Band B ranking) are deemed suitable for Open Windrow Composting, Conventional Thermal Treatment and Advanced Facility Thermal Treatment uses for which Clifton Industrial Estate is not. This is considered to add further weight to the case for identifying Clifton Industrial Estate as a suitable location for the above uses unless proven otherwise by detailed impact assessments to be prepared and submitted as part of any planning application. The Area Description contained in Appendix 1 of the Plan states that Clifton Industrial Estate is accessed via Lumns Lane to the south providing access to the A6044, or via Rake Lane to the west which passes through a primarily residential area. The latter is recognised within the Plan as a constraint to development which would need to be addressed through design and mitigation as part of any development proposals. Further, the site's proximity to the River Irwell and Prestwich Forest Park are also identified as potential development constraints to be addressed through appropriate siting, design and mitigation measures. It is therefore accepted within the Plan that the potential constraints associated with Clifton Industrial Estate could be addressed and mitigated through design and/or mitigation measures. The location of Clifton Industrial Estate within a valley would, as an example, minimise the landscape and visual impact of any development proposals (i.e. chimney stacks). The unsuitability of the area for Conventional Thermal Treatment, Advanced Thermal Treatment and Open Windrow Composting would therefore appear unsubstantiated at this stage without firm evidence of the "potential adverse impact on surrounding area" to which the site profile makes reference. Accordingly, the suitability of Clifton Industrial Estate for these uses, in addition to those for which it is already found suitable, should be recognised within the Waste DPD at this stage in order to retain sufficient flexibility in the potential waste management facilities to be developed across the area. Indeed, the key issues section of the site profile recognises that the area has the potential to accommodate "several types of waste facility". Restricting the type of waste facilities that could be delivered within this area would therefore seem overly restrictive and unreasonable at this stage, and ASL therefore request that the proposed list of suitable uses for Clifton Industrial Estate be revisited prior to the submission of the Waste DPD for examination.</p>	<p>Clifton Industrial Estate is not allocated within the Publication Waste DPD for Open Windrow Composting, Conventional Thermal Treatment and Advanced Facility Thermal Treatment. However, there are other sites within the Publication Waste DPD with a comparable Sustainability Appraisal rating of B which are identified for these uses. At this stage, it is not considered that the exclusion of the Clifton Industrial Estate for the above uses is substantiated by firm evidence and facts demonstrating that these uses are not acceptable. Nor is it understood that there is firm evidence and facts suggesting that other sites are suitable for these uses where allocated</p>
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31452	1	Director Lynx	Policy 6- Inert Residual Waste disposal	<p>Insufficient consideration given to bulk earthworks, volumes generated per annum in the Greater Manchester area. We write in response to the published document and to lodge our concerns over the lack of allocation of disposal points for inert soils/subsoils generated from the construction industry. This item is not construction/demolition waste (i.e skips etc) it is bulk excavations that are not treatable at any recycling centre for two reasons: a) it contains a large amount of clay and therefore incapable of screening b) the physical area (acreage) of any such recycling centre could not cope with the vehicle movements or storage. Its only disposal points are for restoration of old, existing landfills or newly aquired sites and their locations have to be North, South, East and West of Manchester centre. If excavations take place in the south of the region, it is not commercially viable to run to the North of the region. The sites listed i.e Pilsworth North, South and Whitehead will not take inert soils/subsoils in any volumes or at prices that allow developments to be undertaken. It is therefore urgent to address this problem.</p>	<p>Whilst we fully appreciate that the responsibility has been placed on the private sector, unless the local planning authorities assist in either allocating specific sites or are not obstructive when private companies identify opportunities, these future development will be seriously hampered or even placed on hold due to financial implications. It is imperative that the GMGU, local planners and private material handling companies work together to ensure this large volume of materials is handled in an environmental and professional way, benefitting the community from which it was generated.</p>
494797	1		Policy 7- Non hazardous Residual Waste disposal Site allocation W21	<p>It is stated that sites have to meet spatial tests including proximity to transport modes such as road and rail. In respect of the preferred option of the Whitehead landfill site access being from the private road constructed from the A580 East Lancashire Road in 1997/98. Although it was originally intended that this private road would only be in use for 10 years, it is still in use, and to date no maintenance has ever been carried out. Also being a private road 'tolls' have to be paid for the use of the road. Should this private road not be available for any reason whatsoever, due to the existing planning conditions and with no alternative access, the site would come to a standstill. There is also a condition that the landfill traffic should not use the A572 Leigh Road, Boothstown/Worsley route. The plan does not meet Planning Policy Statement 10 which requires Waste Planning Authorities to seek to use modes of transport other than road. A further objective to the Plan is to ensure appropriate protection to the quality of life of communities. As you will be aware Astley Green is a rural village adjacent to the landfill site the site being operational from 1998. Since that time residents have suffered various nuisances including obnoxious smells, flies, gulls and gas leakages. These problems have even occurred in the hot summer months confining residents to their homes behind closed doors and windows. Although there are no statistics to quantify the risk to health of this nearby refuse dump it is possible that the existing air quality could be a hazard to ones health in the future. Surely this does not protect our quality of life. Another objective to the plan is to protect the sub-regional natural environment, bio-diversity, geodiversity, cultural and historic heritage. This landfill site is adjacent to mosslands and Sites of Special Scientific Interest and continual future operation, not only enlarging the area of landfill to twice the size but also increasing the contour heights, must have an adverse effect on the existing wildlife and vegetation. Given the above the plan cannot be completely sound.</p>	

494004	1		Policy 7- Non hazardous Residual Waste disposal Site allocation W21	<p>The Astley Green Residents Association are extremely concerned and worried at the news that the Greater Manchester Waste Disposal Plan Publication Consultation Document now includes the Whitehead Landfill Site as a 'Preferred Option', and proposes to extend the life of Whitehead Landfill (The Tip) by 25 years, doubling its size and increasing its height. This has yet to go through the Planning Permission process, but this proposal seems to have the backing of Wigan Council which is extremely surprising. Brief History. Planning Permission was granted for the Tip to commence in 1999 for a 10 year life. Upon expiry, the land was to be landscaped and returned to the community as fully safe reclaimed land. In 2006 Planning Permission was granted for a 5 year extension, taking the operating life of the Tip to 2014. On behalf of the Residents Association, I spoke against this proposal at the Planning meeting for the following reasons: 1) UK Govt and EEC Policy is to reduce the amount of waste into Landfill Sites - more environmentally friendly solutions need to be pursued. 2) Smells and odours suffered by the Village. 3) Noise and Pollution. 4) Poor Site Management with formal warnings issued by the Environmental Agency. However the 5 year extension was passed by the Chairman's casting vote. Again, upon expiry in 2014, the site was to be landscaped and returned to the community as fully safe reclaimed land. The Residents Association were aware that Whitehead Landfill had been mentioned in the GMWDP Consultative Document as an existing facility, due to close in 2014, but it was not a preferred option at that time as that report concluded that there were too many difficulties associated with extending the life. Some months ago I had a meeting with Lord Peter Smith, Leader of Wigan Council and the subject of Whitehead Landfill was mentioned as we were aware that it had been included in the initial consultative document. At that time I was advised that Wigan Council were against any proposal to extend the Life of Whitehead Landfill, quote 'as it was inappropriate use of Green Belt Land'. Is this still Wigan's attitude and Policy, or has 'money been talking' to a cash strapped council? Bearing in mind the recent Bodens Planning Application which was fought every step of the way by Wigan Planning on the grounds of Green Belt encroachment, it is extremely difficult to understand how Wigan can perform a complete 'about face' and now support an extension to Whitehead Landfill both as to the geographical size, vertical height, and volume to be dumped, possibly for over the next 25 years- it's the same Green Belt Land. May I also bring in Traffic Issues. All waste needs to be brought in by HGV's, the Document envisages considerably more waste, therefore considerably more HGV's. The existing access is via a Private Road with an inadequate junction to the A580 (the East Lancs Road). Are there any proposals now to adopt the Tip Road, and upgrade the Junction on the A580 to a two way traffic light controlled Junction? I would welcome your further assurance that we have got this completely wrong and that there is no possibility of the life of Whitehead Landfill being extended beyond 2014. Summary of Objections 1) Against Govt & EEC Policy 2) Totally inappropriate use of Green Belt Land 3) Existing poor Site Management, with smells / odours, and noise and pollution, formal warnings issued by the Environment Agency. 4) Failure to observe existing planning consents 5) Traffic issues. We have been able to tolerate a Tip knowing it will close in a few years, but I am sure everyone can understand our concern at the present proposals for a Super Tip ad infinitum.</p>	Whitehead Landfill to close on expiry of current Planning Permission in 2014
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495492	1	Culceth and Glazebury Parish Council	Policy 7- Non hazardous Waste disposal	We are not in a position to comment on issues such as the soundness and legality but commend you on not exporting waste to Warrington. We have a landfill site close to Culceth and others a short distance away and the landfill of large amounts of waste from other authorities is opposed by residents both in Culceth and Warrington generally. We are concerned that you are looking at the possibility of exporting waste beyond the plan period, and we would oppose waste coming to Warrington.	
494996	7	Development Surveyor Ainscough Strategic Land	Policy 8- Requirement for combined Heat and Power	Paragraphs 4.6 to 4.16 of the Plan are focused upon Combined Heat and Power, and the considerable benefits associated with combining the production of heat with power. Working on the assumption that the maximum energy output of any waste facility (with the potential to utilise biogas or energy from waste) will be achieved, Policy 8 requires applicants for CHP facilities to demonstrate an existing or new user for the steam of heat offtake, as well as a user of grid connection for the electricity generated as part of any planning submission. The location of Clifton Industrial Estate, and the presence of existing industrial uses, would appear to lend itself to CHP subject to undertaking a detailed feasibility assessment in relation to the delivery of the associated infrastructure across the area (i.e. pipeline). Whilst the approach advocated by Policy 8 would ensure that all heat and power generated by a facility is fully utilised, this should not be seen as a reason for refusal. The wider provisions of Policy 8 are therefore welcomed and supported as a means of enabling applicants to demonstrate a lack of feasibility, particularly in circumstances where it is found that a proposal would otherwise accord with all other relevant provisions of the development plan, and national policy	
494996	8	Development Surveyor Ainscough Strategic Land	Policy 10- Unallocated Sites	Policy 10 of the Plan refers to unallocated sites, and lists two criteria that must be satisfied before planning permission will be granted. Whilst it is fully accepted that the Plan must provide for flexibility to meet future capacity, which may require the release of unallocated sites for waste management facilities, a third criterion should be added to Policy 10 as follows: iii. It has been demonstrated that no allocated sites and areas identified within the Waste Plan are available or suitable. This is important to ensure that those sites and areas identified through the plan preparation process, and which have been found through the Sustainability Appraisal to represent suitable locations for waste management facilities, are afforded priority. A failure to consider the availability and suitability of allocated sites and areas could potentially result in a number of planning applications coming forward for waste management facilities on unallocated sites, which the Waste DPD is designed to avoid.	The Waste DPD in its current form does not afford sufficient weight to the bringing forward of those sites and areas allocated within the DPD in advance of unallocated sites. This would potentially mean that sites which have not been subject to the Sustainability Appraisal and consultation as part of the plan preparation process could potentially secure planning permission application ahead of those sites which through lengthy and detailed consultation have been found to represent suitable sites for waste management facilities. This would seem to go against the purpose of local community and consultee participation in the preparation of the Waste DPD to identify suitable sites, who in turn could object to non-allocated sites coming forward.

494851	4	Planning and Conservation Adviser Natural England	Chapter 5- Monitoring and Implementation	<p>^ Natural England is satisfied that HRA has been undertaken to meet the requirements of the Conservation of Habitats and Species Regulations 2010. We welcome the fact that that the extension of the Whitehead landfill has been subject to Appropriate Assessment, as it would be within 1.5km of the Astley Moss SSSI/SAC (which is part of Manchester Mosses SAC), in line with our consultation response at the Preferred Options stage. We support the conclusions of HRA Report, and would welcome the recommended addition to the supporting text to policy 10, requiring applications for waste facilities on unallocated sites to be subject to the same HRA screening as the site allocations within the DPD. As discussed in our response to policy 10, we are concerned that it is currently unsound as it does not reflect the recommendations of the HRA report. We also note that the conclusion section of the HRA report (paragraph 6.6) does not clearly reflect the findings of the main body of the report (paragraph 4.22) and the mitigating text to be added to policy 10 should reflect the specific wording set out in paragraph 4.22.</p>	
494851	5	Planning and Conservation Adviser Natural England	Waste Plan: Publication DPD Habitats Regulations Assessment	<p>Whilst we do not consider the Monitoring and Implementation to be unsound, we are disappointed that the reference to Biodiversity Duty, which was removed from the Monitoring and Implementation section following the Issues and Options stage, has not been reinstated in line with our recommendation at the Preferred Options stage</p>	