

GREATER MANCHESTER JOINT WASTE DEVELOPMENT PLAN DOCUMENT

**Summary of Publication Representations 1st
November– 13th December 2010**

Summary of representations

On Monday 1st November 2010 the Greater Manchester Joint Waste Development Plan Document (the Waste Plan) was published and then subject to a six week period of statutory consultation in which stakeholders were asked whether or not they considered the published DPD to be 'Sound' and ' Legally Compliant'. The six week consultation closed on Monday 13th December.

Preparations are underway to submit the Waste Plan to the Secretary of State at the end of February 2011. The Waste Plan will then undergo an independent examination, likely to take place in early summer 2011.

In total 48 representations were received from 23 organisations/individuals. The following table sets out a summary of the key points made by representees and what changes are to be submitted alongside the Waste Plan at the end of February.

Unique ID	Ref	Name/ Organisation	Policy/ Chapter	Summary of Representation
494851	3	Natural England	Waste Plan: Publication DPD Executive Summary	Do not consider the DPD to be unsound but 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.
494996	1	GVA Grimley on behalf of Ainscough Strategic Land (ASL)	Chapter 1- Aims and Objectives Spatial Portrait: paragraphs 1.12 and 1.13	ASL support the Aim and Objectives of the Plan and supports the inclusion of Clifton Industrial Estate as an Area Allocation

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494851	1	Natural England	Chapter 1: Aim and Objectives Aim: Paragraph 1.23	Do not consider Aim unsound but would welcome greater reference to the need to preserve and enhance the natural environment. Would recommend that the text is amended to recognise that adverse impacts should be avoided where possible, before being mitigated. Additional text has been provided.
494851	2	Natural England	Chapter 1: Aim and Objectives Aim: Paragraph 1.25	Do not consider the Aim to be unsound but are disappointed that 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.
344481	1	Network Rail	Paragraph 1.28	Support for the plan process and reminder to involve Network Rail where planning applications come forward near their land holdings
494996	2	GVA Grimley on behalf of Ainscough Strategic Land	Chapter 1- Aims and Objectives Objectives	ASL support the Objectives of the Plan and the report and the flexible approach adopted with respect of the types of facilities to treat waste in Greater Manchester.
494996	3	GVA Grimley on behalf of Ainscough Strategic Land	Chapter 1- Aims and Objectives Spatial Strategy: Paragraph 1.36	ASL support the recognition that road transport will remain an important method of transporting waste in Greater Manchester.
494996	4	GVA Grimley on behalf of Ainscough Strategic Land	Chapter 1- Aims and Objectives Spatial Strategy: Paragraph 1.40	ASL support the spatial strategy and in particular feel that the area allocation at Clifton Industrial Estate represents a suitable area for collocation as supported within the spatial strategy.
490896	2	Sky Properties	Paragraph 2.2	The difference between capacity and throughput is striking and that

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				<p>data from the Needs Assessment indicates the following:</p> <table border="1"> <thead> <tr> <th>Treatment method</th> <th>Throughput (approx tonnes)</th> <th>Capacity (approx tonnes)</th> </tr> </thead> <tbody> <tr> <td>All Treatment (exl recycling)</td> <td>216,000</td> <td>1.4million</td> </tr> <tr> <td>Waste transfer</td> <td>1.8million</td> <td>8.7million</td> </tr> <tr> <td>Recycling</td> <td>1.1 million</td> <td>2.4million</td> </tr> <tr> <td>All Treatment (exl recycling)</td> <td>216,000</td> <td>1.4million</td> </tr> </tbody> </table>	Treatment method	Throughput (approx tonnes)	Capacity (approx tonnes)	All Treatment (exl recycling)	216,000	1.4million	Waste transfer	1.8million	8.7million	Recycling	1.1 million	2.4million	All Treatment (exl recycling)	216,000	1.4million
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490896	3	Sky Properties	Paragraph 2.27	Capacity for C&I waste 2011 is over 2.5million tonnes but evidence base states that that total recycling capacity for all non inert waste streams at 2.4million tonnes in 2009.															
490896	4	Sky Properties	Paragraph 2.32	The reasons for the assumptions on capacity and throughput are not made explicit in the Waste Plan.															
31452	1	Lynx Euro	Chapter 2: Future Waste Management Requirement Paragraph 2.49	Insufficient consideration given to bulk earthworks, volumes generated per annum in the Greater Manchester area. Lack of allocation of disposal points for inert soils/subsoils generated from the construction industry.															

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494996	5	GVA Grimley on behalf of Ainscough Strategic Land	Policy 1: Commercial and Industrial Waste Energy Recovery	ASL consider the Waste Plan to be overly restrictive on the requirements for energy recovery capacity over the Plan period and in particular the cap placed on the number of larger and smaller energy recovery facilities to be delivered. They state that this approach appears to conflict with the flexibility afforded by the Aim and Objectives of the Waste Plan. As a result they have requested that the 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".
216729	1	Peel Environmental Ltd	Policy 1: Commercial and Industrial Waste: Energy Recovery	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.
31327	1	Emerson Group (Kerren Phillips)	Policy 4- Site Allocations Site Allocation BL9: Watersmeeting C South Triangle, Bolton	It is not appropriate to allocate a waste use within such close proximity to high end business park uses (Valley Business Park).

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31327	2	Emerson Group (Kerren Phillips)	Policy 4- Site Allocations Site Allocation BL9: Watersmeeting C South Triangle, Bolton	Risk to the watercourse and reservoir in close proximity of the site from contamination appears greater than at other sites.
31327	3	Emerson Group (Kerren Phillips)	Policy 4- Site Allocations Site Allocation BL9: Watersmeeting C South Triangle, Bolton	The green corridor to the east and south of the site should not be impacted on by a waste use and any proposal should include adequate screening and landscaping
31327	4	Emerson Group (Kerren Phillips)	Policy 4- Site Allocations Site Allocation BL9: Watersmeeting C South Triangle, Bolton	Current site is heavily treed and any waste development would impact on wildlife
31327	5	Emerson Group (Kerren Phillips)	Policy 4- Site Allocations	Four of the seven sites allocated for waste management are rated as Band C in terms of their sustainability appraisal and are therefore

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		Phillips)	Site Allocation BL9: Watersmeeting C South Triangle, Bolton	potentially not going to be able to come forward because of the significant planning issues that would require significant mitigation. The remaining three sites in Band B should be those sites which are allocated, not those in Band C.
31327	6	Emerson Group (Kerren Phillips)	Policy 4- Site Allocations Site Allocation BL9: Watersmeeting C South Triangle, Bolton	Traffic generated by such waste uses (heavy goods vehicles and refuse vehicles) will pass through a high end area and will act as a disincentive to development in this area.
490896	1	Sky Properties	Policy 4- Site Allocations Site Allocation SL11:Michell Shackleton, Salford	<p>Objection to the exclusion of site SL11 Mitchell Shackleton as an allocation from Policy 4 of the DPD.</p> <p>Sky Properties consider that Policy 4 is unsound and does not make sufficient provision for sites capable of meeting the demands of sustainable waste management. In particular the provision in the Policy departs from PPS10 in a number of respects.</p> <p>The site comprises a combination of retained and allocated employment land and bringing the site forward for development would contribute to regeneration.</p> <p>Planning applications have been submitted to the Council for the</p>

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				<p>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. 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.</p> <p>The evidence base clearly establishes a need for waste development and a capacity gap. Site SL11 has been through sustainability appraisal (SA) demonstrating that, subject to dealing with some specific environmental issues, the site is suitable for waste uses. Indeed it performs well against other sites that have been identified. It is considered that no sound reasons have been put forward to remove the site.</p> <p>The development of waste uses at SL11 would contribute positively to and not hinder regeneration and need not be at odds with the wider ambitions for the area. Modern well designed waste facilities should be seen as a positive regeneration force.</p> <p>The exclusion of the site is in direct conflict to Salford CC's UDP Policy E5 which seeks to protect employment land. The Nasmyth employment area (which includes the Mitchell Shackleton site) is a well defined area and there have been no incursions into it by other</p>

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				<p>land uses. An application for housing on the site in 2006 was refused by the Council and the subsequent appeal refused by the Secretary of State.</p> <p>In summary, there is no current justification to consider non-employment uses on the Mitchell Shackleton site. The site was therefore rightfully considered by the Waste DPDs site selection exercise.</p> <p>Sky Properties believe that the Waste DPD has failed to acknowledge this approach adequately and has failed to allocate enough land of sufficient availability and flexibility. Of the seven allocations in Policy 4, five do not offer the benefits of co-location of 'closed' facilities being only suitable for single or alternative technologies (eg. MBT and/or AD).</p> <p>The Waste DPD evidence base found that</p> <ul style="list-style-type: none"> • The site is available • The site is flexible with regard to the entire range of 'enclosed' facilities. • The site is sustainable with regard to the SA. • It would generate less traffic than a residential use at peak time • The highway network is suitable for the proposed level of movements. • There is the potential to redirect traffic away from the residential Lansdowne Road.

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				<ul style="list-style-type: none"> • Impacts on the canal and its ecology can be controlled. • The M602 embankment provides adequate physical separation with the adjoining residential area.
31339	4	English Heritage	Policy 4- Site Allocations Site Allocation W4: CA Site Makerfield Way, Wigan	The site profile should be amended to include reference to the heritage asset and its setting within the 'key issues' box.
31339	2	English Heritage	Policy 5- Area Allocations Area OL1: Land off Higginshaw Lane, Oldham	The site profile should be amended to include reference to the heritage asset and its setting within the 'key issues' box.
292601	1	CPD Land Agents (Sonia Swift)	Policy 5- Area Allocations Area Allocation OL3: Land off Higginshaw Lane, Oldham	Support inclusion of OL3 as an area allocation. Would like to be made aware of the submission and examination stages of the Plan.

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494363	1	S Birmingham	Policy 5: Area Allocations Area Allocation RD6: Mandale Park, Rochdale	<p>The local community at Beechwood gardens has not been consulted on this allocation.</p> <p>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.</p> <p>Translation of the plan should be available to local residents whose first language is not English.</p> <p>A newspaper article in a local paper weeks before the deadline is not the best way to seek local views.</p> <p>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.</p>
31587	1	Mr K Sartain	Policy 5- Area Allocations Area Allocation RD6: Mandale	<p>Lease Land included within allocation (as leased by Rochdale MBC to Beech House School) cannot be used to build on, as per lease agreement with Rochdale Council</p>

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			Park, Rochdale	<p>Consultation with all interested parties should be carried out</p> <p>The site access road should not be put next to a school with large vehicles parking at traffic lights next to the school playground.</p>
491303	1	Cllr Ian Duckworth	Policy 5- Area Allocations Area Allocation RD 6: Mandale Park, Rochdale	<p>No community involvement during all stages of the Plan on the allocation of Mandale Park.</p> <p>Townships and Area Forums have not received consultation on the Waste Plan.</p>
490489	1	Mr D Hall	Policy 5- Area Allocations Area Allocation RD6: Mandale Park, Rochdale	<p>No Public consultation from the start.</p> <p>Pollution survey not carried out at busiest junction of A627M</p> <p>Plans to build a road through Mandale Park would result in the loss of the park and would be too close to the school and hospital.</p> <p>Start the full proposal from the beginning and involve residents in the local area regarding pollution and the road through Mandale Park</p>
489679	2	Brimrod, Sudden & Marland Area Forum (Rochdale)- Mrs Beryl	Policy 5- Area Allocations Area Allocation RD6: Mandale Park, Rochdale	<p>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</p>

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		Hudson		
494996	1	Deployment Ltd (Stanley Castleton)	Policy 5- Area Allocations Area Allocation RD 6: Mandale Park, Rochdale	Objection to allocation of Mandale Park for waste management uses. 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
419082	1	Margaret Bruce	Policy 5- Area Allocations Area Allocation RD6: Mandale Park, Rochdale	There are no details of what a Waste Plan should involve. Without these it is useless.
494996	6	GVA Grimley on behalf of Ainscough Strategic Land	Policy 5: Area Allocations Area Allocation SL2: Clifton Industrial Estate, Salford	ASL consider the list of facilities judged suitable for development on SL2 Clifton Industrial Estate is overly restrictive and would wish to see the this expanded to include the full list of waste management uses. ASL state that they would not wish to see sites identified under Policy 4 afforded hierarchical preference , nor their availability seen as a reason to refuse the development of waste management facilities in those areas allocated under Policy 5.

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485664	9	GVA Grimley on behalf of Ainscough Strategic Land	<p>Policy 5: Area Allocations</p> <p>Area Allocation SL2: Clifton Industrial Estate, Salford</p>	<p>ASL state that because SL2 Clifton Industrial Estate has been ranked as a Band B through the Sustainability Appraisal it should be suitable for all types of waste management use, including thermal treatment. They state this would bring SL2 in line with the other sites which are Band B and listed as suitable for a larger range of waste uses. Restricting the type of waste facilities that could be delivered at SL2 would therefore seem overly restrictive and unreasonable at this stage.</p> <p>ASL therefore request that the proposed list of suitable uses for Clifton Industrial Estate be revisited prior to the submission of the Waste Plan for examination.</p>
31339	1	English Heritage	<p>Policy 5- Area Allocations</p> <p>Area SL3: Cobden Industrial Estate, Salford</p>	<p>Site boundary should be amended to exclude the listed building.</p> <p>The site profile should be amended to include reference to the heritage asset and its setting within the 'key issues' box.</p>
31339	5	English Heritage	<p>Policy 5- Area Allocations</p> <p>Area Allocation TR17: Land at</p>	<p>The site profile should be amended to include reference to the heritage asset and its setting within the 'key issues' box.</p>

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			Trafford Park, Trafford	
31339	3	English Heritage	Policy 5- Area Allocations Area Allocation TR18b:Carrington n Area part B Carrington Vehicle Storage Works, Trafford	The site profile should be amended to include reference to the heritage asset and its setting within the 'key issues' box.
450930	1	British Waterways	Policy 5- Area Allocations Area Allocation: W1a Miry Lane Employment Area, Wigan	Current summary sheet for this area allocation 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: <ul style="list-style-type: none"> • 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 • That British Waterways as must be consulted on any planning application.
31339	6	English Heritage	Policy 5- Area Allocations Area Allocation W13a: Martland	The site profile should be amended to include reference to the heritage asset and its setting within the 'key issues' box.

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			Park, Wigan	
495492	1	Culcheth and Glazebury Parish Council	Policy 7- Non hazardous Residual Waste Disposal	<p>Support allocation of sites within Greater Manchester to avoid export of landfill waste to Warrington.</p> <p>Would not wish to see waste being exported to Warrington beyond the Plan period when capacity at GM sites comes to an end.</p>
494004	1	Astley Green Residents Association (Mr JP Mellor)	<p>Policy 7: Non Hazardous Residual Waste Disposal</p> <p>Site Allocation W21: Whitehead Landfill, Wigan</p>	<p>Astley Green Residents Association consider that this policy goes against Government and European policy, which they say is to reduce the amount landfill and that more environmentally friendly solutions need to be pursued.</p> <p>This policy is an inappropriate use of Green Belt. Astley Green Residents Association compare the site to another proposal in the Green Belt that was refused on the basis of encroachment on the Green Belt.</p> <p>The existing landfill is poorly managed, and that there are problems with smells, odours, noise and pollution arising from the landfill. The Environment Agency have issued formal warnings relating to the landfill and that there has been a failure to observe the existing planning consents.</p> <p>The Waste Plan envisages considerably more waste and will therefore result in more HGV movements.</p>

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				<p>The existing site access is from a private road constructed from the A580 and the junction of the private road with the A580 is inadequate.</p>
494797	1	Mr Alan Liptrot	<p>Policy 7: Non Hazardous Residual Waste Disposal</p> <p>Site Allocation W21: Whitehead Landfill, Wigan</p>	<p>Mr A Liptrot considers that the existing site access is from a private road constructed from the A580 and that the private road was originally intended to be in use for 10 years and that it has not been maintained. 'Tolls' have to be paid for using the road and that should this private road not be available for any reason, due to the existing planning conditions and with no alternative access, the site would come to a standstill. There is a condition that the landfill traffic should not use the A572 Leigh Road, Boothstown/Worsley route.</p> <p>The plan does not meet Planning Policy Statement 10 which requires Waste Planning Authorities to seek to use modes of transport other than road. The Plan states that sites have to meet spatial tests including proximity to transport modes such as road and rail.</p> <p>It is an objective of the Waste Plan to ensure appropriate protection to the quality of life of communities. 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. 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. Mr A Liptrot is concerned that the</p>

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				<p>allocation of W21 does not protect quality of life.</p> <p>It is an objective of the plan to protect the sub-regional natural environment, bio-diversity, geodiversity, cultural and historic heritage and that Whitehead Landfill is adjacent to mosslands and Sites of Special Scientific Interest. Continued operation, include vertical and lateral extensions, would have an adverse effect on the existing wildlife and vegetation.</p>
494996	7	GVA Grimley on behalf of Ainscough Strategic Land	Policy 8: Requirement for Combined Heat and Power	ASL consider that the requirement to provide Combined Heat and Power could be seen as a reason for refusal of a planning application through Policy 8.
494996	8	GVA Grimley on behalf of Ainscough Strategic Land	Policy 10: Unallocated Sites	<p>ASL accept that the Plan must provide for flexibility to meet future capacity, which may require the release of unallocated sites for waste management facilities, but suggest the inclusion of a third criterion to be added to Policy 10 as follows:</p> <p>“iii. It has been demonstrated that no allocated sites and areas identified within the Waste Plan are available or suitable.”</p> <p>ASL state that this is required to ensure that sites and areas allocated within the Plan, 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</p>

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				forward for waste management facilities on unallocated sites, which the Waste Plan is designed to avoid.
494851	4	Natural England	Chapter 5: Monitoring and Implementation	Do not consider the Monitoring and Implementation to be unsound but 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 recommendation at the Preferred Options stage.
494713	1	Environment Agency	Waste Plan: Publication DPD	No comments
31218	1	Viridor Waste Management Ltd	Waste Plan: Publication DPD	Full support of the Plan, especially factual evidence, assessment and reasoning employed for the allocation of the three landfill sites are Pilsworth N & S and Whitehead.
494851	5	Natural England	Waste Plan: Publication DPD Habitats Regulations Assessment	Satisfied that HRA has been undertaken to meet the requirements of the Conservation of Habitats and Species Regulations 2010. 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.