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# Matter 2: The Need for Waste Management Facilities

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## 1. Introduction

Entec UK Ltd is acting on behalf of Sky Properties. The matter identified by the Inspector is to assess whether the needs identified for waste management facilities in the DPD are justified by the evidence base. The objectives set out by the Inspector with regard to this matter are:

- To ensure that Scenario 2 is the most appropriate and is supported by a robust and convincing evidence base.
- To ensure that any flows of waste into and out of Greater Manchester are appropriate to its general location in relation to adjoining waste planning authorities.
- To test whether there is a capacity gap for dealing with any particular waste stream.
- To be satisfied that the proposed level of energy recovery capacity is founded on a sound evidence base (Policy 1).

## 2. Evidence Base

The needs assessment does appear to have considered the key data sources typically used in policy formulation. It is not clear however from the updated assessment document published in March 2010 whether the new 2009 Environment Agency commercial and industrial waste data has been applied. Aside from this, the main issue that needs to be addressed is the assessment of capacity and the review of existing capacity in particular.

The model uses Environment Agency permit data and it is indicated that actual throughputs have been assessed wherever possible. Commonly there can be a significant discrepancy between permitted or licenced capacity and the actual capacity of many facilities. Table 10 of the updated assessment sets out the capacity data expressed in the model and it is notable that there is a significant discrepancy between the current throughput at many sites and the current capacities.

So for example, whereas the current capacity for waste treatment plants is 1.4 million tonnes, the current throughput is 216 000 tonnes. There is a similar picture for recycling with a current capacity of 2.4 million tonnes and a throughput of 1.2 million tonnes. The data then has an even greater discrepancy on transfer stations with an unbelievably high estimate for current capacity at 8.7 million tonnes against a throughput of 1.8 million tonnes. This flows through into the capacity gap analyses and impacts particularly on the recycling and treatment surplus capacities identified. It would be useful to further understand the extent to which the capacities have been verified, particularly for those facilities making the most significant contribution to the capacity estimates. It our view that this reinforces the need for the DPD to be flexible in its provision / allocated sites.

The nature of the modelling work undertaken does not readily facilitate an analysis of waste arisings, forecasts and capacities by waste type. In view of developments in the Greater Manchester Waste Contract this would have been useful. It is our view that the more global assessment undertaken hides the fact that there are shortfalls in capacity in the commercial and industrial waste management sector.

The 2009 RTAB monitoring report notes that the North West region has made progress towards reducing growth in commercial and industrial waste in line with the target for 0% annual growth, with a reduction of 2.5% from 2003 to 2006. However, whilst industrial waste had reduced by 14% since 2003, commercial had increased by 11% over the same period. As well as evidence of progress in waste management practices, this is consistent with the trend of reduced manufacturing and an increase in retail, wholesale and other services which now accounts for 40% of commercial and industrial waste arisings. This is significant given that the materials most likely to be available for energy recovery are more readily derived from the commercial sector. So as the balance in arisings changes, so will there be an increased opportunity to recover more materials and divert more waste from landfill. We consider this further below.

A final point is that it would be further useful to understand the variability in the composting capacity and need estimates from the 2007 data and the updated 2010 data. A surplus is now quoted at the beginning of the plan period albeit it appears to decline until a deficit is reached in 2024.

### 3. Scenario 2

The main issue that we have raised in respect of Scenario 2 has been that it is not ambitious enough in respect of maximising the value that Greater Manchester can extract from the wastes arising in the conurbation and particularly in the commercial and industrial waste sector.

The aim must be to remove wastes from the waste stream that can be re-used and recycled, to remove wastes from which value can be recovered, and to process wastes in a way that leaves the residues more stable so reducing their potential effect on the environment. Using waste as a resource is the key to maximising the value obtained from waste processing and treatment and a key element of this can also be the generation of energy.

In October 2009 Defra published its *Statement of Aims and Actions for Commercial and Industrial Waste in England*. This states that the objectives for commercial and industrial waste mirror those for household waste and other types of waste in the context of the Waste Strategy 2007. They are to:

- Reduce the amount of waste that arises in the first place - by more sustainable design, production, purchasing and use as well as reuse of products and materials in the economy;
- Increase the proportion of the waste that does arise which is productively re-used, recycled or recovered;
- Reduce significantly the amount of waste that is sent to landfill or incinerated without recovering energy;
- Manage any remaining residual waste responsibly;

- Maximise the investment opportunities for business from commercial and industrial waste management.

The 2009 Renewable Energy Strategy recognises the potential role that energy from waste can play in meeting targets. The strategy states that *Waste biomass is an under-used resource which could provide a significant contribution to our renewable energy targets and reduce the total amount of waste that is landfilled in the UK. We estimate that 6 million tonnes of waste wood and 9 million tonnes of waste food are currently landfilled each year. Strenuous efforts are being made to minimise this waste - for example by improving the way date labelling on food communicates information about food safety to consumers - but it is clear that a supply of waste food and wood will exist for the foreseeable future.* The strategy refers to a potential ban on the landfilling of certain materials which would increase the requirement for new waste treatment capacity.

Table 12 of the updated assessment shows an annual requirement of 1.2 million tonnes of landfill in 2012 reducing to 837 000 tonnes in 2027. A capacity gap kicks in after 2011. There is an opportunity to increase the recovery element of the model to assist in reducing the capacity gap for landfill. This could be effective from say 2015 as it will take time for new facilities to be developed. This approach would ensure that the conurbation takes responsibility for managing the commercial and industrial waste it produces and obtains value in the form of energy and employment from the waste it produces.

## 4. The Capacity Gap

From the above analysis we draw the following conclusions:

- The assessment of current capacity is likely to be an over-estimate but notwithstanding on the basis of the evidence presented there is a clear need to increase energy recovery and the key sector to focus upon will be the commercial and industrial waste sector;
- As accepted in the Needs Assessment, the analysis masks potential shortfalls in certain types of facility – it recognises for example that there could be a need for certain types of waste recycling facility to deal with component parts of the waste stream.
- There is significant potential to do more in terms of energy recovery in the commercial and industrial sector and to reduce landfill further.

We would also highlight that there is limited spatial assessment of where the gaps in capacity are and how this relates to the sites and areas identified in the plan. So for example, despite the significant shortfall in energy recovery capacity and the recognition that sites will often need to be in excess of 1.5/2 ha, only two sites are identified in this range – TR8a Tank Farm in Trafford (the only site within the conurbation) and W4 Makerfield Way in Wigan. The former is towards the lower end of the site size required and it is not clear what the developable area would be. The latter is on the edge of the plan area and not proximate to the main sources of arisings in Greater Manchester.

The evidence base argues that 13.85 ha has been allocated but 8.86 ha is at one site in Wigan (W4) and the remainder include 4 sites under 1 ha with limited potential to contribute to energy recovery targets. The conclusions of the site assessment do not appear to have been focussed on

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addressing either spatial capacity gaps or in preserving an adequate range of strategic sites in excess of 2 ha.

It is our view that additional sites for waste recovery need to be identified and we have promoted the omission site SL11 which would help meet the capacity gap in the Salford area. The merits of this site are explored in the paper presented for Matter 4.

Ian Cromie  
Director  
Entec UK Ltd