

Main Matter 3: Spatial Strategy

Key Issue: Whether the spatial strategy is the most appropriate, and is soundly based

- 1 A number of reasonable and realistic spatial alternatives were considered during the development of the spatial strategy to ensure the most appropriate option was selected. These are summarised below.

Stage One Issues and Options May 2007

- 2 Work on the spatial strategy began at Stage One Issues and Options (**CDC003**), which contained a section on Spatial Context as part of the Evidence Base. This covered three topics – **Social**, dealing with current and forecast population and households and main transport links; **Economic**, dealing with the relationship between economic activity and waste arisings, competition for available land for development and the need for waste management facilities located close to urban areas where there are people and business producing waste; **Environmental**, balancing need for waste development with protection of natural and historic environment as some environmental designation pose a constraint to waste uses.
- 3 The following factors, relating to the development of the spatial strategy and the pattern of distribution of waste management facilities, were also considered at Stage One Issues and Options:
 - **Sites vs. Areas**, whether to focus on 'areas', such as industrial estates, or clusters of small 'sites'.
 - **Sustainable transportation of waste** (subsequently referred to as access), considering prioritisation of sites close to existing rail/canal depots and wharfs to utilise sustainable transport.
 - **Factors affecting technological and economic viability of facilities**, e.g. identifying sites of various size and types as some facilities need to be a certain size to ensure viability (regionally/nationally significant facilities) and to ensure flexibility.
 - **Identification of Sites/areas for waste management facilities (Rural vs. Urban locations)**, considering whether a mix would be required to

ensure sufficient sites to suit different types of waste management facilities.

- **Expansion of existing waste management facilities**, considering expansion of existing waste management facilities as way to identify sites. Cumulative impact was also considered.
- 4 In addition, the need for ruling out particular types of waste management processes which would be unacceptable for planning reasons at particular locations was considered.

Stage Two Issues and Options: Built Facilities October 2008

- 5 The outcomes from the consultation on Stage One Issues and Options and the strategic objectives of the Waste Plan were used to develop four options for the distribution of sites/areas in Stage Two Issues and Options:
1. **Access** Based on distance of sites/areas from strategic roads, rail and canal. This sought to utilise sustainable transport and ensure the appropriate road network is used.
 2. **Growth Areas** Based on predicted housing and employment growth areas as set out in the emerging Regional Spatial Strategy. Aimed to ensure communities take responsibility for their own waste and reduce the distance travelled by waste.
 3. **Clusters** Based on the location of existing facilities and industrial areas. This could minimise environmental impact of new waste development through expansion of existing sites and utilisation of existing transport networks.
 4. **A combination of access, growth areas and clusters**
- 6 Factors raised in the Stage One Issues and Options Report such as where waste arises and physical and environmental constraints were recognised as being important components of the spatial strategy but not ones where reasonable alternatives could be developed and therefore were retained for use in the development of the final spatial strategy.
- 7 Each of the four alternative options (access, growth areas, clusters and combination) were appraised through Sustainability Appraisal. The results of this process can be found in section 6.4 of the Sustainability Appraisal Report for Stage 2 Issues and Options (**CDC007**) and influenced the development of the spatial strategy.

- 8 Following consultation it was agreed to take forward approach 4, which combined options 1 - 3 (see Outcomes Report for Preferred Options **CDC008**). This approach was chosen because it was most favoured by stakeholders and performed well in the Sustainability Appraisal. In addition, as shown in **TD023** 'Matrix of Internal Consistency', this approach demonstrates consistency with the aim and objectives of the Waste Plan.
- 9 The rejected options for the spatial strategy were the individual options of access, growth areas or clusters. This was consistent with the findings of the Sustainability Appraisal, which suggested that, on their own, none was more sustainable than the other. In addition, it emerged through consultation that the use of individual options was not favoured by stakeholders.

Stage Two Issues and Options: Residual Waste Disposal March 2009

- 10 Stage Two Issues and Options: Residual Waste Disposal (**CDC019**) set out a number of reasons why the location of landfill sites would be unlikely to fit with the spatial strategy. Instead, the document set out that the location of landfill will rely on the availability of void space, groundwater and geology and, in Greater Manchester, is likely to be within the Green Belt.
- 11 The accompanying Sustainability Appraisal (**CDC013**) concluded that in an area like Greater Manchester, which is constrained in terms of potential locations for landfill (see Maps 3 and 4 after page 38 of **SD001**), there may not be significant scope to identify sites based on the strategic and spatial distribution.
- 12 This point was confirmed by stakeholders through consultation, who clarified that the distribution of landfill sites should be dictated by availability of void space, either existing or capable of being created rather than spatial options 1-4 (see **CDC014**).
- 13 At the same time as the spatial strategy was being developed during Issues and Options, spatial objectives were being refined and each informed the development of the other. Elements of the strategic objectives which were particularly relevant to the spatial strategy were: protecting quality of life of communities and the sub-region's natural environment, biodiversity, geodiversity; cultural and historic heritage.

Preferred Option November 2009

- 14 As described in paragraph 9 of this Statement, the Preferred Option for the spatial distribution of waste management facilities was Option 4 – combination.
- 15 No specific feedback about the spatial strategy was received from stakeholders during consultation at this stage (**CDC019**). However, it emerged that stakeholders were broadly in agreement with the spatial objectives although they suggested improvements, which were used to review the objectives prior to Publication.

Publication November 2010

- 16 The spatial strategy set out in the Publication Waste Plan reflects the interrelated aspects of the Plan's evidence base, government advice, Objectives and the views of Stakeholders. The 3 aspects of the spatial strategy (access, growth areas and clusters) were combined and taken forward because there were all based on sustainable concepts. The other considerations that influenced the spatial strategy as mentioned in paragraph 7 (protection of sensitive places and places where waste development could make a positive contribution) were also incorporated. This is described in paragraphs 1.36 – 1.44 of the Submitted Waste Plan (**SD001**).
- 17 The spatial strategy used to guide the Site and Area Allocations within the Published Waste Plan incorporates six key parameters
1. Places accessible by different modes of transport
 2. Places close to where additional waste is expected to arise in the future
 3. Places near to existing waste management facilities
 4. Places with a sensitive natural or built environment, hydrology or close to existing communities
 5. Places where landfill or land raising can have positive impact on the environment
 6. Places where waste management development can realistically be expected to take place
- 18 At this stage, the Sustainability Appraisal (**CDC026**) summarised the previous appraisal of the spatial strategy rather than re-appraising it. This is because there is no requirement for a Sustainability Appraisal report at this stage but it was considered important to ensure sustainability was taken into account.

- 19 No representations on the spatial strategy were made at publication and the spatial strategy at Submission is the same as at Publication.
- 20 The chosen spatial strategy is soundly based because it is justified. This is demonstrated by the fact that it is derived from the Evidence Base (summarised in paragraph 17 of this Statement and in detail in **SD001** Chapter 1) and because the Waste Plan is internally consistent with itself (see **TD023**). In addition, the results of the Sustainability Appraisal (**CDC007** and **CDC021**) suggest this was the most sustainable option and the outcomes of consultation suggest this was Stakeholder's preferred option for the spatial strategy (**CDC005**, **CDC008**, **CDC014** and **CDC022**).
- 21 The chosen spatial strategy is soundly based because it is effective. This is demonstrated by the fact that it addresses the issues raised in the Spatial Context described in Stage One Issues and Options as part of the evidence base. This is summarised in the Matrix of Internal Consistency (**TD023**). It is particularly effective for future landfill requirements because there is certainty that these requirements can be delivered.
- 22 The chosen spatial strategy is soundly based because it is consistent with national policy and is internally consistent. National, sub-regional and local policy was used to inform the Evidence Base from which the spatial strategy was developed. Information on national policy that informed the spatial strategy is set out in Chapter 1 of the Submission Waste Plan (**SD001**).

Key Issue: Does the strategy result from considering reasonable and realistic spatial alternatives?

- 23 Questions 7-9 of the Soundness Self Assessment **CDE001** deal with the consideration of alternatives and state where the information showing how this was undertaken can be found. Outcomes reports prepared as a result of consultation of the plan undertaken as part of the work for Regulation 25 are summarised in SD006 Statement of Consultation.
- 24 Stage One Issues and Options (**CDC003**) described the spatial context for Greater Manchester and set out the evidence base for the Waste Plan. The Evidence Base, along with the outcomes of consultation and the results of the Sustainability Appraisal, was used to derive options for the spatial strategy as set out in Stage Two Issues and Options: Built Facilities. The options were reasonable and realistic because they were derived from the Evidence Base

and recognition of the need to be implementable, and they are demonstrated to be internally consistent (see **TD023**).

- 25 Options for the distribution of waste management facilities were subject to Sustainability Appraisal and this is documented in chapter 6.4 of the Stage 2 Issues and Options Built Facilities Sustainability Appraisal (**CDC007**) and chapter 4.4 of the Stage 2 Issues and Options Residual Waste Disposal Sustainability Appraisal (**CDC013**). The outcomes from the appraisal were used to inform the Preferred Option.

Objective 1: To ensure that the DPD is consistent with other strategic policies such as those included in RSS and Core Strategies

- 26 The Waste Plan has been produced alongside the preparation of the ten district core strategies.
- 27 At present only two of the core strategies have been adopted, two are currently undergoing Examination (Oldham and Trafford), whilst Rochdale has Submitted its Core Strategy and is awaiting a date for Examination. Manchester and Wigan intend to Submit later in 2011.
- 28 The Waste Plan is consistent with the Core Strategies. The Districts, as clients, have scrutinised the Plan at all stages and approved it for consultation. At the same time, GMGU has assisted in the preparation of policies in the Core Strategies which address the issue of waste, for example through the development of a model policy.
- 29 With regard to conformity with the RSS, this is set out in Core Document CDE001 – Soundness Self Assessment, specifically the response to questions 11-13. Technical document **CDE008** sets out the impact of the revocation of RSS on the Plan. The approach in the Plan is further supported by **CDE009** – Email from Spatial Planning Manager at GONW and **CDE011**- Email from Duncan McCorquodale previously of 4NW.
- 30 Reference to RSS was removed from the Waste Plan following the announcement by the Secretary of State in May 2010 of its proposed abolition. Although RSS was re-instated in November 2010 following a successful challenge by Cala Homes, reference to RSS in the Waste Plan was not re-introduced. This was because the RSS policies do not comply with PPS 10 (as admitted at the RSS EiP) and the data used to inform RSS Policy EM13 was out of date. Therefore, the data used to inform the Waste Plan is

more up to date and robust and this is reinforced by correspondence from the Spatial Planning Manager at GONW.

- 31 In light of this it is considered reasonable to progress the Waste Plan without reference to RSS. This approach is justified by the following facts.
- 32 A statement setting out the implications for the Waste Plan of the removal of RSS (**CDE008**) concluded that the revocation of RSS will not result in a policy gap for the Waste Plan. However, even before the revocation of the RSS, the Waste Plan evidence base was developed using sub-regional data and information on the most recent waste studies in the region, completed following the adoption of RSS, as it was felt this offered a more up to date position on waste arisings in the North West. As a result of this, the Waste Plan is based on the best available data and evidence available. There are three areas where this is evident within the Plan:
1. In relation to regional apportionment of waste, a more detailed and accurate assessment of waste arisings has been undertaken for the Waste Plan which supersedes information included within the NW RSS. Further to this, 4NW recognised that use of the more recent studies and EA data superseded the information on which the apportionments within RSS are based and supports the evidence put forward in the Waste Plan (**CDE009**). The NW authorities commissioned a number of surveys on the arisings of C&I and CDEW waste streams following the adoption of RSS. The results of the surveys were used to inform the development of the Needs Assessment 2007 and update 2010.
 2. The Needs Assessment models future waste requirements beyond the RSS figures (which only ran to 2021) to 2027, which is consistent with the requirements of PPS10.
 3. Evidence base documents commissioned by 4NW, such as **North West Regional Technical Advisory Body Report on Cross Boundary Movements of Waste in the Northwest Region (TD015)**, commissioned after the adoption of RSS have been used to inform Waste Plan policy development.

Objective 2: To understand the extent to which the spatial disposition of proposed allocations for waste management facilities has been predetermined by existing commitments.

- 33 Greater Manchester is covered by two Waste Disposal Authorities. Wigan Waste Disposal Authority (WWDA) handles municipal waste arising in Wigan, whilst Greater Manchester Waste Disposal Authority (GMWDA) handles municipal waste arising in the remaining nine authorities. In line with their Municipal Waste Management Strategy (MWMS) and to meet national targets to divert waste from landfill, GMWDA entered into a Private Finance Initiative (PFI) with Viridor-Laing in 2009 to build and operate municipal waste facilities. The process of identifying sites for the PFI began in 2004/05 using a methodology developed by Entec (**TD025**) and by 2007 a number of sites suitable for the facilities required under the PFI had been identified. These sites were owned by GMWDA or the relevant Local Authority. The planning application process commenced in 2009, with planning permission for all PFI sites having been granted by the time the Waste Plan was published in November 2010. GMGU assisted in the planning process for PFI sites through the preparation of an Interim Position Statement (**TD027**) which provided Local Planning Authorities with guidance on the determination of waste planning applications in the absence of local waste planning policies consistent with PPS10.
- 34 As part of work on the Waste Plan, a site search commenced in 2007, using the methodology developed by Entec for the PFI scheme as its basis. The spatial considerations used in the Waste Plan site search methodology are based on similar principles to those of the Entec site search and the two methodologies are therefore consistent. Whilst the PFI sites were predetermined by existing commitments undertaken prior to the commencement of the Waste Plan, they are derived from this process and are therefore compatible with the Plan's approach to site allocations. A number of the PFI sites were also considered at the early stages of the Waste Plan site search however, they were removed from the consideration through the Waste Plan when planning permission was granted.
- 35 It is therefore clear that sites identified in the Waste Plan and through GMWDA PFI were identified using a similar site search process and although the PFI sites were permitted prior to publication of the Waste Plan, they are compatible with the site search process and the spatial strategy of the Submitted Waste Plan.
- 36 Wigan's 2009 MWMS states that the Plan will include site allocations for additional facilities to meet the targets of the Strategy (**TD021**, page 18) and includes details of the types of waste technologies required to meet these targets. This information was used along with the 2010 update of the Needs

Assessment (**TD010**) to review Waste Plan sites which could meet the requirements of the Wigan MWMS. The review indicated that additional sites were required. Due to the specific technical and financial constraints influencing the selection of sites to meet the Strategy requirements, Wigan Council put forward areas which they considered capable of meeting the MWMS these locations were largely within their ownership or the ownership of partners involved in the procurement programme. The areas were subject to normal assessments described in the Waste Plan Site Search Methodology (**TD017**) and Sustainability Appraisal and fit well with the Spatial Strategy of the Plan.

- 37 An additional consultation on Areas in Wigan (**CDC023**) was undertaken in June 2010. No objections were received against these additional areas and they were included as allocations at Publication stage in November 2010 (**CDC025**).
- 38 It is therefore clear that sites allocated in the Waste Plan to meet the requirements of the Wigan MWMS have been assessed using the Site Search Methodology and subject to the same consultation processes as all other allocations and therefore have not been predetermined by existing commitments.
- 39 The methodology used to identify built waste management facilities in the Waste Plan is described in 'Site Search Methodology' (**TD017**). The spatial distribution of sites and areas set out in Waste Plan Policies 4 and 5 is based on the spatial strategy, described in paragraphs 4 to 14 of this Statement. Sites and areas have been allocated to meet waste requirements between 2012 and 2027 and were not predetermined by existing commitments. It should also be noted that any areas required to deliver the Core Strategy were removed from the process.
- 40 As described in paragraphs 11-12 of this Statement, in a constrained, urban area such as Greater Manchester, there are few opportunities for landfill and therefore limited scope to use the spatial strategy to identify landfill sites. Landfill operator Viridor nominated 3 sites for consideration, 2 of which were extensions to current, operational landfills with the third being an extension to a closed landfill. These extensions were subject to the assessments described in the Waste Plan Site Search Methodology (**TD017**) and Sustainability Appraisal. Public consultation on these sites was in July 2009 (**CDC016**) and they were included as allocations in Waste Plan Policy 7 at Publication.

- 41 In April 2011, one of the sites allocated for landfill, BU12 Pilsworth South in Bury, received planning permission for an extension. The Waste Plan does not include allocations for sites with existing Planning permission therefore a minor change has been proposed to remove BU12 as an allocation.