

Main Matter 4: Site and Area Allocations (Policies 4 and 5)

Key Issue 1: Whether the selection of the Site Allocations is based on appropriate criteria.

1. The criteria used to select sites/areas (including locations for residual waste disposal) for allocation within the Waste Plan is set out within Site Search Methodology (TD017). This document sets out how the methodology was used at each stage of Plan preparation.
2. The basis of the site search criteria was developed from the approach used by the Greater Manchester Waste Disposal Authority during their search for sites in 2004/5 (TD025). This approach was used to develop options for defining the criteria for the Waste Plan site search methodology which were initially discussed at stakeholder events in March 2007 (outcomes CDC001) and then included within the Issues and Options stage 1 Report (CDC003 pgs 83-88). The responses received to this consultation (contained within CDC005), along with outcomes from stakeholder events were used to develop the criteria for the site search methodology and this was then used to identify sites/areas for inclusion within the Stage 2 Issues and Options reports for both Built Facilities (CDC006 pgs 34-39) and Residual Waste (CDC012). Comments on the Site Search Methodology were welcomed at early stages of Plan preparation and were taken into account to assist the identification of the final allocations included within the Submitted Plan. Each site/area included for consultation during the preparation of the Plan was also subject to a Sustainability Appraisal, which is part of the Site Search Methodology, but carried out by independent assessment.
3. Future applications for waste management developments on both allocated and unallocated sites are encouraged to consider the site selection methodology evidence and submit information relating to the considerations which informed the site search methodology (Submitted Plan, pg 65, para 4.5) and address any issues identified.

Key Issue 2: Whether there is a sound match between the Sites which are allocated and the estimated demand for the facilities which could be located at them.

4. The Waste Plan allocates sites and areas to meet the capacity requirements set out within the Needs Assessment. The capacity requirements for built waste management facilities has been identified as 5.2 million tonnes of waste over the Plan period (2012-2027) at a maximum of 5 new energy recovery facilities. In calculating this figure of 5 facilities an average capacity of 75,000 tonnes per annum, per facility has been used as supported by 'Planning for Waste Management Facilities: A Research Study' (Defra, **NP015**). This study estimates that the area required for these types of facilities is between 2 and 4 ha for a facility which can process between 75,000 and 120,000 tonnes of waste per annum (tpa). In calculating the total number of facilities required by the end of the Plan period, it is reasonable to state that one facility with a capacity of 75,000tpa will cover approximately 2ha. Therefore, based on facilities with the smallest capacity, 5 facilities, each requiring 2ha of land area will require 10 hectares of land in total.
5. The sites listed in the table in Appendix 1 of 'Response to Inspectors Note 2' (**RD007**) are included in the Submitted Waste Plan as Site Allocations. The table identifies the total area of these sites to be 13 ha, this is an excess of 3 hectares above the 10 hectares (5 facilities). Due to economies of scale, facilities with a larger capacity would require less land overall but the Waste Plan provides capacity to ensure the maximum land is available to meet the capacity requirements throughout the Plan period.
6. The information included within GMGUs Response to the Inspectors Note 2, query b and Appendix 1 (RD007) states what type of waste management facility is suitable at each allocated site and how much land area the facility type requires.
7. The requirement for non hazardous residual waste disposal facilities is also informed by the Needs Assessment which sets out that Greater Manchester must identify sufficient sites to dispose of 5.9 million tonnes of waste (this figure is based on the proposed change in **SD009** ref. APMC/AGMA/11-17). In terms of the number of facilities required for the disposal of this level of waste the Plan includes two allocations (See **SD009** APMC/AGMA/11-17), together, these sites provide sufficient capacity to meet the required 5.9 million tonnes of capacity over the Plan Period. Due to the difficulty in identifying suitable locations for the disposal of waste, the selection process used to identify the allocated sites differs

slightly from identified for built waste management facilities; this process is set out within **TD017**. More information on the site search and selection methodology is set out within the Matter 6 Statement.

Key Issue 3: Whether the evidence base justifies the number and location of the selected Area allocations.

7. Page 60 of the Submitted Waste Plan sets out the reasons for identifying areas in addition to sites within the Waste Plan. Over the plan period it is likely that technologies will change and the way public attitudes to waste will change. Both of these factors could result in the need for more waste management facilities if existing facilities do not have the capacity, or as the composition of waste changes new types of facility may be required.
8. As such the sites allocated in the Plan may not meet specific needs or new facilities may be required close to existing waste producers to gain benefits of co-location. Therefore the Plan has taken a flexible approach by identifying a range of areas across Greater Manchester where such developments may come forward and would not constrain alternative types of appropriate development.
9. Although the Needs Assessment identifies that there is surplus existing capacity at recycling and treatment facilities it is not possible to know how much of the available capacity is taken up purely by waste arising in Greater Manchester and how much is taken up by imported waste and how much is unused capacity. In addition, although it may be considered that recycling facilities may be multi-material specific, many facilities and reprocessors are material specific and consequently any surplus capacity available at such facilities is not transferable. Therefore, although it may appear that there is currently no requirement for additional facilities, there may be a material specific need which the Plan has not provided for and if such a facility was to come forward, the area allocations identified could meet this requirement.
10. The area allocations cover large industrial/employment areas which may currently have existing uses on them. Therefore, although the areas in total provide some 1,084.95 ha, in reality this is not all available capacity and should not be considered as such.

Key Issue 4: Whether Sustainability Appraisal has been comprehensive and is adequate.

11. The Waste Plan has been subject to a comprehensive and adequate Sustainability Appraisal.
12. The following stages of Plan preparation underwent Sustainability Appraisal:
 - Stage 1 Issues and Options (**CDC004**)
 - Stage 2 Issues and Options Built Facilities, including site specific Sustainability Appraisal (**CDC007**)
 - Stage 2 Issues and Options Residual Waste Disposal, including site specific Sustainability Appraisal (**CDC013**)
 - Preferred Option – sustainability review (**CDC021**)
 - Publication (**CDC026**)
13. All sites and areas consulted on during Plan preparation were subject to technical appraisal of the sustainability and general suitability of each site/area for waste management facilities. The results of this process were used to inform the decision on whether or not the site/area should form part of the Plan's strategy for delivering future waste management facilities.
14. The final appraisal of each site/area comprising Waste Plan Policies 4, 5 and 7 can be found in Technical Appendix 4 of submission Sustainability Appraisal Report Technical Appendices (**SD004**). This shows the criteria and constraints that were used during the appraisal of each site/area and provides detailed information on potential waste management technologies considered suitable on each site/area which was assessed having regard to Government guidance - ODPM (2004) Planning for Waste Management Facilities – A Research Study (**NP015**).
15. Each site/area appraisal concludes with an assessment of the overall performance of the site/area and a banding from A-D is awarded depending on sustainability. The Sustainability Appraisal rating (A – D) was used to inform which sites should be taken forward as part of the Plan. Those sites/areas awarded a 'Band D' rating were not taken forward as they had been deemed unsuitable for waste management facilities in terms of sustainability. Sites/areas awarded a Band A – C rating were taken forward, whilst recognising that varying levels of mitigation would be required depending on the rating. This is set out in

Appendix 1: Introduction of the Waste Plan (**SD001**). Details on sites/areas excluded because they were awarded a 'Band D' rating can be found in Site Search Methodology (**TD017**).

16. The results of the site/area Sustainability Appraisal have been used to inform site specific Waste Plan Policies 4, 5 and 7. These policies set out which waste facility types the site/area would potentially be suitable for, based on the outcome of the site appraisal.
17. Responses and additional information received during consultation on sites/areas were used to re-appraise sites/areas. Re-appraised sites are identified as such in Technical Appendix 4 of submission Sustainability Appraisal Report Technical Appendices (**SD004**). Where re-appraisal has resulted in a downgrading of the sustainability rating to a Band D, the site/area has been removed and this is documented in the Site Search Methodology (**TD017**).
18. In addition, the spatial distribution of sites/areas was informed by the Sustainability Appraisal process as documented in chapter 6.4 of **CDC007** and chapter 4.4 of **CDC013**.

Key Issue 5: Whether there should be a sequential test of preferences: i.e. Sites, Areas and then land unallocated but acceptable.

Objective: *To ensure that the allocation of the particular Sites and Areas are founded on a robust and credible evidence base and are the most appropriate in the circumstances.*

19. A sequential test of preferences of site before areas before unallocated sites was deemed unsuitable for the Plan area as this may have resulted in local area needs not being met if there was no site or area allocation close by that would serve a specific need. If a sequential test approach was used this could mean that a development would be required to come forward on a site allocation in a different district resulting in unnecessary transportation of waste. There are limited opportunities to bring forward site allocations as these are safeguarded solely for waste use and have landowner support for such development to come forward. Area allocations as discussed early provide more flexibility and identify industrial/employment areas on which waste development is deemed appropriate alongside other general employment/industrial uses.

20. The inclusion of a policy on unallocated sites goes further to allow land which may not previously considered by the Plan due to reasons such as it was not previously available or had been identified for another use in a Core Strategy for which it was no longer required to come forward for use as waste development. Without such a policy there would be no means of assessing such sites.
21. The inclusion of a requirement within Policy 10 'Unallocated Sites' for all unallocated sites to provide evidence that an allocated site/area would not be more suitable would seem to be overly difficult for applicants. The approach taken with the Submitted Plan requires unallocated sites to meet the same criteria as sites/areas allocated within the Plan, but cannot require more onerous standards if it is to remain flexible throughout the Plan period.
22. Furthermore, paragraph 2, page 5 of PPS10 states that Waste Planning Authorities should provide sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time. If the sequential approach was taken the Plan could not ensure that this requirement would be met due the large area being covered by the Waste Plan. Therefore the decision not to include this option was taken.