

Tel: 061 604 7746  
Our Ref: CW01  
Date: 13 April 2011

Dear Natalie,

**Subject: Budget 2011 – Planning for Growth**

Thank you for the letter sent regarding the implications of the budget 2011 – Planning for Growth on the soundness of the Greater Manchester Waste Development Plan Document (the Waste Plan).

I have reviewed the statement made by The Rt Hon Greg Clark MP and the further details contained in the Treasury's 'The Plan for Growth'.

The Waste Plan takes a positive approach to development and has identified both sites and areas for future waste development to offer a flexible and responsive supply of land. Therefore, I am satisfied that the Waste Plan, once adopted, will assist in achieving the aims of the government on this matter.

Yours Faithfully,



**Carolyn Williams**  
Principal Planner (Minerals and Waste)  
For and on behalf of the ten Greater Manchester Local Authorities

## Blackston, Natalie

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**From:** Info [info@lynxeuro.co.uk]  
**Sent:** 14 April 2011 16:30  
**To:** Blackston, Natalie  
**Subject:** The Greater Manchester Waste Plan Development Plan Document: Examination: Budget 2011

Dear Natalie,

Whilst it is highly commendable to review the current planning procedures and encourage better decisions and speedier decisions.

The waste aspects of planning changes especially the enormous volumes of soils / subsoils are only part of the problems.

So long as construction surplus excavations are classed as a waste product, planners will continue to reject applications for the much needed disposal sites.

Why? Because planners are now guided by the over powerful Environmental Agency.

In most cases not only are they an adversary against any form of recovery application but they are also the slowest department to determine simple decisions. The Environmental Agency have no knowledge of the commercial reality of delays.

Major development will be delayed months whilst waiting for permits for the recovery of millions of cubes of soils / subsoils, in fact they are suppressing economic growth to a major proportion.

Lack of knowledge of the building / development industry costs many millions of pounds to private enterprises. It threatens jobs, investment in new plant and equipment and in many cases prevents the re-use of such soils for the benefit of society.

Unfortunately the GMW DPD has not really addressed this major "waste" problem, but we believe it could be a simple strike of the pen, removing soil / subsoils (clean) out of the waste category would take these large volumes out of the DPD and would also take it from the grips of the bureaucratic Environment Agency.

Building houses / commercial developments / motorways etc all generate soils / subsoils in large volumes should the economy pick up which it will undoubtedly do. We have no provision for the recovery of these large volumes especially whilst classed as waste.

Regards

Robin Arnold

cc. Rt. Hon Greg Clarke MP - Minister of State

LYNX EURO MANAGEMENT  
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06/05/2011

## Blackston, Natalie

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**From:** Stan Castleton [stan@deployment.com]  
**Sent:** 18 April 2011 10:31  
**To:** Blackston, Natalie  
**Subject:** [Probably Spam]Mandale Park Waste Plan/ Ministerial Statement 'Planning for Growth'  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

*'The Chancellor has today set out further detail on our commitment to introduce a strong presumption in favour of sustainable development in the forthcoming National Planning Policy Framework, which will expect local planning authorities to plan positively for new development; to deal promptly and favourably with applications that comply with up-to-date plans and national planning policies; and wherever possible to approve applications where plans are absent, out of date, silent or indeterminate'*

The paragraph above, taken from the Planning for Growth Statement, says to me "pass plans at *almost* any cost even if it means using bully boy tactics and take no notice of local fears or inhibitions."

I would like to ask the inspector and the minister, would plans for the same type of unit and a new road, carrying 44 ton articulated trucks, within 100 yards of their house, or more to the point, their children`s school be passed. **I think not.**

I do not have much hope of these plans being denied, because of local government pampering to out of touch and uncaring ministers.

## Blackston, Natalie

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**From:** Hubbard, Alan [alan.hubbard@nationaltrust.org.uk]  
**Sent:** 18 April 2011 15:39  
**To:** Blackston, Natalie  
**Subject:** Greater Manchester Waste Plan DPD Examination: Budget 2011 - response from National Trust  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Dear Mrs. Blackston,

Thank you for your letter of 12<sup>th</sup> April 2011 inviting comments on the implications of the Government's Budget, and in particular the Minister's Statement on 'Planning for Growth' for the DPD and the Trust's submissions. On this occasion there are no specific comments/implications that the Trust wishes to draw attention.

Kind regards,  
Alan Hubbard  
Planning Adviser  
National Trust  
Stamford Estates Office  
18 High Street  
Altrincham  
Cheshire  
WA14 1PH

Tel: 0161 925 4330  
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Email: [alan.hubbard@nationaltrust.org.uk](mailto:alan.hubbard@nationaltrust.org.uk)

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2 May 2011

Our ref: NW10/11CON21966

Your ref: NBlackston



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Land Use Operations  
Team  
Natural England  
Hornbeam House  
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**BY EMAIL ONLY**

T 0300 060 3900

Dear Ms Blackston

**The Greater Manchester Waste Plan Development Plan Document: Examination: Budget 2011**

Thank you for your consultation on the above dated 12 April 2011, which was received by Natural England on 14 April 2011.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has **no comment** to make in relation to this application.

From the information provided with this application, it does not appear to fall within the scope of the consultations that Natural England would routinely comment on. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to comment.

Should the Development Plan Document be altered in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Should you wish to discuss this response please do not hesitate to contact me at the above address.

Yours sincerely

Janet Baguley  
Planning and Conservation Adviser  
Land Use Operations Team  
Direct dial: 03000601772  
Email: [janet.baguley@naturalengland.org.uk](mailto:janet.baguley@naturalengland.org.uk)

## Blackston, Natalie

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**From:** Info [info@lynxeuro.co.uk]  
**Sent:** 26 April 2011 16:20  
**To:** Blackston, Natalie  
**Subject:** Waste Plan Development document hearing  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Dear Natalie,

We attended the above on Thursday 21st April 2011 and feel we should make the following comments.

(A) Whilst everyone appreciates that it is a Waste Plan, we still feel that not sufficient thought has gone into the millions of tonnes of subsoils / soils generated in the Northwest. This cannot be simply identified as "inert" as on many occasions it is not inert. It is also not construction / demolition waste, it is a separate entity totally.

We feel it should be given a separate segment, whilst it is called waste.

Unfortunately it cannot be recycled in the way that other wastes can, but it has major beneficial uses for the community, if one can get rid of the WASTE stigma.

Such large volumes cannot be ignored or else illegal dumping will increase dramatically at enormous cost to the tax payer.

(B) Policy 7. It was noted comments re. Viridor, Whitehead site. Whilst the emphasis was on general waste, it also has a major bearing on subsoils / soils disposal.

The industry cannot rely on private commercial ventures such as Viridor, Whitehead. Should Planning be refused or Viridor simply 'mothball' the site for commercial reasons, which they are entitled to do. What other provisions are there?

Unless Planning Authorities get their acts together and give permissions quickly the industry could grind to an abrupt halt.

We have not even touched on the major delays caused by the Environment Agency.

Your comments would be gratefully received.

Regards

Robin Arnold

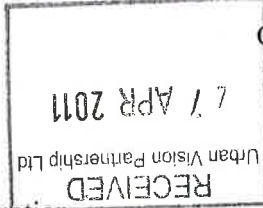
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26 April 2011

Our Reference – 25042C119/IC/ljh



Ms N Blackston  
Greater Manchester Waste Plan Examination  
Urban Vision Partnership  
Emerson House  
Albert Street  
Eccles  
Salford M30 0TE

Dear Natalie

## **GREATER MANCHESTER WASTE PLAN DEVELOPMENT PLAN DOCUMENT EXAMINATION: BUDGET 2011**

As you are aware I am acting on behalf of Sky Properties in respect of the omission of Site SL11 Mitchell Shackleton from the Submission Waste Plan DPD. Your letter of 12 April, regarding the *Written Ministerial Statement: Planning for Growth*, which was published by Greg Clark, the Minister of State for Decentralisation on 23 March 2011, asks for comment in respect of the implications, if any, of this new policy position for the soundness of the Plan.

The Statement indicates that the Government's top priority is to promote sustainable economic growth and jobs. It expects development and growth to go ahead unless this would compromise the key sustainable development principles set out in national planning policy. It is our position that the statement reinforces our arguments for the allocation of Site SL11 in the Waste Plan DPD.

The reason for the omission of the site was that its allocation would be *premature as the future regeneration plans for the area are unknown*. However the site comprises retained employment land and is part allocated for employment within Salford's UDP. A waste management use falls within the definition of an employment use in planning policy terms. This is recognised in Salford's Established Employment Areas Supplementary Planning Document.

The site is located within the Nasmyth employment area which makes a significant contribution to the city's employment base, in terms of the number of existing business occupiers which together account for a significant number of jobs. There are approximately 30 business occupiers within the Nasmyth employment area, which together account for approximately 700 employees. The area is comparatively well occupied with only 3 premises currently advertised as vacant through the FOCUS commercial database.

The recently published Bridgewater Canal Masterplan, which is a non-statutory document, indicates that the employment uses in the area east of the canal are operating efficiently and the masterplan plan envisages redevelopment for employment uses in the area including the Mitchell Shackleton site.

**Ms N Blackston, Greater Manchester Waste Plan Examination**

It is difficult to see, therefore, how the development of waste uses would be inconsistent with regeneration. The Mitchell Shackleton site has been considered for a number of uses in recent years. An application for housing was refused in 2006 and an appeal dismissed, in part on the basis that a housing use would deplete the stock of employment land in the area. A range of employment and leisure uses have been considered by Sky Properties on the site but proved to be unviable. Hence waste uses have been considered; indeed applications have been submitted and are as yet undetermined for a range of recycling and recovery operations. The applications have the potential to directly create 60 jobs with a further 17 jobs expected to be created as a result of the proposals. Waste recovery proposals also have the potential to contribute to local energy requirements which in turn can help support regeneration.

Rather than potentially hinder regeneration, an allocation for waste uses would support the sustainable development of this vacant site, support local employment, improve the environment of the Canal corridor and offer opportunities for synergies with new development in the area. This is entirely consistent with the Government's agenda for economic growth.

Yours sincerely



**DR IAN CROMIE**

Director

Direct Line – 01743 342021

E-mail – cromi@entecuk.co.uk



**Blackston, Natalie**

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**From:** Peter Wishart [Peter.Wishart@viridor-laing.co.uk]  
**Sent:** 21 April 2011 14:08  
**To:** Blackston, Natalie  
**Cc:** Ian John  
**Subject:** The GMWPDPD-Examination:Budget 2011 and Treasury Statements

Dear Ms Blackstone,

Thankyou for your letter of 12th April,2011 inviting comments (on behalf of the Examination Inspector) on the planning policy changes announced in the recent 2011 Budget Statement and the Treasury's " The Plan for Growth".

I believe these statements help to reinforce the need for an up-to-date Waste Development Plan covering the whole of the Greater Manchester area to provide for and facilitate the adequate provision of waste management facilities and infrastructure to support sustainable economic development in the community and growth of jobs,households,local industries,commerce and businesses.

Viridor is a major provider of a broad range of waste management facilities across the Manchester sub-Region and beyond dealing with practically every aspect of waste resource management covering a wide spectrum of waste types derived from households,commerce,businesses and industry.

The waste resource industry and management is an integral part of the economy and provides valuable jobs directly and indirectly and support for economic growth generally.For example,the Company operates in Manchester a recently awarded 25 year PFI Municipal Waste Contract providing numerous purpose built new site facilities dealing with waste prevention and reduction;waste resource management;recycling and composting;transfer stations and operating depots;household waste recycling centres; In-vessel Composting, AD and MBT processing plants;and two operational residual waste disposal landfills namely at: Whitehead-Wigan and Pilsworth-Bury.The Manchester PFI Municipal Waste Contract represents a considerable investment of both public and private finance into an integrated network of waste management facilities with an emphasis on the new waste hierarchy as set out in the new Waste Framework Directive(2008/98/EC) treating waste as a resource whilst also operating in the most sustainable manner possible to foster economic prosperity and the well being of the area.Apart from dealing with municipal wastes the Company manages waste from the equally important commercial,business and industrial sectors which must be adequately planned and catered for in the emerging new Waste DPD.

In connection with the above mentioned Pilsworth Landfill site, a planning application for an extension (c.1.8Millions m3, upto 2028) has been recently APPROVED by Bury Council on 19th April,2011, in line with Bury's saved UDPlan policies and those policies, allocations and the waste strategy contained in the

emerging draft GM Waste DPD. This newly approved landfill extension at Pilsworth will provide an essential part of the necessary strategic waste management landfill infrastructure and capacity required to support economic growth, prosperity of households and industry and jobs throughout the Manchester sub-Region.

In respect of the recent Government announcements we consider that all the proposed residual waste landfill allocations made in the WDPD are absolutely essential to underpinning the waste strategy going forward where there is an overriding and demonstrable need to provide continuity of landfill disposal space to deal with any residual waste remaining after all other waste prevention, reduction, preparing for re-use, recycling and composting or other recovery treatment initiatives have been first fully exploited. The continued backing of the Greater Manchester WDPD for landfill allocations at Whitehead and Pilsworth (both North and South sites) will provide a firm and positive policy context for Viridor and the sub-Region to forward plan with confidence to ensure (as evidenced already) these proposed allocations are provided and financed at the appropriate time to serve the plan area and local communities, commerce and industries' needs.

In the light of the recent Budget and Treasury Statements and the aforementioned Waste Framework Directive (affecting a change to Annex C of PPS 10: The revised waste hierarchy) Viridor fully endorses the overall waste strategy and allocations made in the draft WDPD; welcomes the strong presumption in favour of sustainable development supported by WDPD policy to encourage and support a robust, as possible, local economy. Viridor is looking towards the adoption of the WDPD to support the waste industry in providing the necessary support infrastructure which in turn lays down the foundations for future economic growth and prosperity in the region. The Budget and Treasury Statements in my view re-emphasise the importance and need for the emerging WDPD and confirms that its proposed strategy and policies remain relevant, up-to-date, robust and "sound"; and, therefore, are enthusiastically supported by Viridor.

Viridor wish to re-iterate its continued support for the DPD's waste strategy, policies and proposed allocations and look forward to the Plan's eventual formal adoption. I trust the above comments will be taken into account by the Inspector.

Regards,

Peter Wishart,  
Company Planning Advisor,  
On behalf of Viridor.

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06/05/2011