

# Greater Manchester Joint Waste Development Plan Document

Project Plan

Final Report

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Greater Manchester Geological Unit

# Greater Manchester Joint Waste Development Plan Document: *Project Plan*

June 2006

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# 1 JOINT WASTE DEVELOPMENT PLAN DOCUMENT: PROJECT PLAN

## 1.1 INTRODUCTION

This project plan has been prepared to provide a step-by-step guide to producing the joint waste development plan document (JWDPD). It draws on guidance published by the ODPM, signposting other relevant and useful documents and providing recommendations on sequencing and methods of tasks that need to be undertaken. It should be read in conjunction with relevant legislation, regulations and national policy statements to ensure correct preparation of the JWDPD.

The JWDPD is a joint local development document being produced under Section 28 of the Planning and Compulsory Purchase Act 2004.

## 1.2 FORMAT OF THE PROJECT PLAN

The remainder of this project plan has been split into the following sections:

- *Section 2 Preliminary Tasks*
- *Section 3 JWDPD Preparation Tasks*
- *Section 4 Individual Authority's Local Development Frameworks*
- *Section 5 Financial and Human Resources*

A system of coloured boxes has been used to assist in the presentation of this project plan. They are coded as indicated below.

**Preliminary or Preparation Task**

**Test of Soundness**

**Signposting**

**Cross working**

**Alternative suggestion**

**Supplemental Task**

**General information/suggestions on best practice**

This section presents a number of tasks that are particular to the circumstance of a number of authorities working together to prepare a joint DPD. They are not covered in significant detail in current ODPM guidance. Instead, the recommendations made here have been drawn from recent documents, discussions with GONW and other waste planning authority partnerships.<sup>(1)</sup>

As far as possible the preliminary tasks should be undertaken concurrently so as to avoid delaying the start of JWDPD preparation. A report will need to be presented to the AGMA Chief Executives to update that of 29 July 2005 and to gain agreement on the proposals contained within this project plan and the JWDPD strategy.

### Preliminary Task 1: Prepare report to AGMA Chief Executives.

## 2.1

### POLITICAL AND PUBLIC INVOLVEMENT

Community engagement is a key feature of the new planning system, enabling front loading, early decision making and ongoing involvement from a range of stakeholders including the general public, local politicians, industry representatives, statutory regulators and action groups.

The new planning system promotes early engagement to enable key decisions to be made early in the plan making process and to avoid unnecessarily lengthy independent examination. It is therefore important to commence participation initiatives as soon as possible, and to establish systems to enable continuous involvement by those who want to be involved.

**Political commitment** to joint working in developing a planning framework for waste management across Greater Manchester has already been established in principle. This now needs to be entrenched to ensure that that commitment is made available in reality, to minimise risk to delivery of the JWDPD and to ensure that waste planning is integral to political thinking throughout the Greater Manchester authorities.

This will be best achieved through establishment of the Joint Committee (refer *section 2.1.2*). But also through use of training for significant players and relevant stakeholders within each authority, including: elected Members, Chief Executives; and Heads of Planning.

(1) Including the Association of London Government and Berkshire Joint Strategy Unit.



**Public involvement** includes reference to a number of stakeholders including:

- general public;
- statutory consultees;
- waste management industry;
- community groups;
- town councils/ townships
- local strategic partnerships (especially where responsible for preparation of the community strategy);
- primary care trusts;
- waste disposal authorities; and
- action/focus groups.

Increasingly there will be opportunities to work with the two waste disposal authorities (WDA) to ensure comprehensive community involvement initiatives and reduce 'consultation overload,' specifically in regard to waste management. There will also be the potential to use communication networks that have already been established through each of the planning authorities.

However, it should be recognised that comprehensive involvement of communities will incur a heavy burden. Effective consultation initiatives require a good deal of time to organise and incur a number of costs including: printing documents; publicising events; inviting delegates; hiring venues; providing feedback; handling enquiries and catering etc.

### **2.1.1**      *Statement of Community Involvement*

All planning authorities must produce a statement of community involvement (SCI) setting out how it will engage with relevant stakeholders in undertaking its duties. Preparation of the JWDPD will need to be in conformity with the SCI as produced by each authority in Greater Manchester.

The JWDPD should also be informed by, and inform, the two WDA municipal waste management strategies. These strategies, as well as each authority's own LDD will be going through consultation programmes of their own. There is a very real danger of creating 'consultation overload' and confusion when seeking to engage communities in preparation of the JWDPD.

A consultation strategy should be produced to be directly relevant to the JWDPD:

- that will comply with the requirements of The Town and Country Planning (Local Development) (England) Regulations 2004, as a minimum;
- that draws on each of the SCI produced to date; and
- that seeks to make efficiencies through co-ordination with each of the authorities and WDA consultation initiatives as relevant.

The consultation strategy must be compliant with each district's SCI. It should set out creative and meaningful approaches to engage with stakeholders, including doubling up with other consultation initiatives and focussing on early decision making initiatives. It is recognised that each authority is at a different stage of production of SCI; as such integration of the consultation strategy will necessarily have to be a staggered process. How this is achieved will need to be discussed and agreed within the Steering Group at the earliest opportunity.

**Preliminary Task 2: Prepare a JWDPD consultation strategy to be integral to each authority's SCI.**

**Test of Soundness ii:** JWDPD must be prepared in compliance with SCI or minimum requirements of The Town and Country Planning (Local Development) (England) Regulations 2004.

**Signposting:**  
PPS 12 Companion Guide – Section 7 and Table 7.3  
The Berkshire Unitary Authorities Joint Minerals and Waste Community Involvement Protocol  
PPS 10 Companion Guide – Section 5 and Annex B

## 2.1.2

### *Governance*

The ODPM advice,<sup>(1)</sup> via GONW, is that a Joint Committee can be established to act as the Executive, with responsibility for all documents except those prepared for submission and adoption, which must be agreed at Full Council. This presents an opportunity for streamlining the decision-making process and reducing risks to delivery of the JWDPD.

Where a Joint Committee is established under Section 101 (5) of the Local Government Act 1972, constituent authorities should establish a remit for the Joint Committee through a local agreement. The local agreement should be prepared by GMGU and agreed by all authorities at Full Council.

The local agreement should draw upon the AGMA constitution and include details such as:

- membership of the Joint Committee (elected representation from all authorities);
- meeting arrangements;
- the structure for reporting to the Joint Committee;
- maintaining dialogue with each authority's relevant committees and Full Council;

(1) Meeting held at GONW offices on 21 October 2005.

- independent examination arrangements; and
- methods for ensuring commitment to the JWDPD throughout its development.

In order to ensure production of the JWDPD remains on schedule, it will be necessary for the Joint Committee to meet frequently and for there to be a minimal lead time prior to meetings. Joint Committee meetings are proposed every two months in the project plan; although some deviations from this are included toward the end of the production process as appropriate. The Joint Committee should be provided with a copy of the JWDPD strategy and project plan at the training day.

The Joint Committee should be supported by a JWDPD Steering Group made up of officers from each authority. This group should also include representation from the North West Regional Assembly and the two WDA, as appropriate. GONW is not expected to be in regular attendance at the Steering Group meetings, but a representative may attend as an observer or to provide specific advice as required. A memorandum of understanding may be beneficial to the Steering Group to secure the level of expected commitment and to establish relevant items such as: chairmanship; meeting arrangements; and role of the Group. The Group should meet on a monthly basis, with flexibility for additional meetings as necessary. Flexibility can also be built in through agreed use of discussion between the Steering Group by email/conference calls as or when necessary.

**Preliminary Task 3:**

- a) Prepare the local agreement and gain agreement from all authorities.**
- b) Establish Joint Committee and hold training day.**
- c) Establish JWDPD Steering Group, with MOU as required.**

**Signposting: AGMA constitution**

**Cross working: Impacts on preparation of detail to be entered into each authority's LDS (Preliminary Task 4).**

## 2.2

### *INCLUSION IN LOCAL DEVELOPMENT SCHEMES*

All the local development schemes (LDS) make brief reference to the JWDPD, but do not include any timescales for its production as this was not previously available.

Each authority's LDS must include details of: the role of the JWDPD; its production timetable and required resources; the chain of conformity; annual monitoring arrangements; the evidence base; and recognition of risks to production and how these will be managed. It should also clarify the scope and purpose of the JWDPD and how it fits within the wider strategy of the LDD produced by each authority.

As most LDS are currently being revised, this provides the most appropriate opportunity to ensure that the JWDPD is properly included. The production timetable of the JWDPD will be dependent, in part, on the arrangements of the local agreement. As such, GONW has advised that it would want to see the local agreement established prior to JWDPD entry into revised LDS. Ideally, submission of LDS would be delayed until JWDPD details have been agreed. Where LDS are submitted prior to this agreement, the relevant authorities should update and resubmit their LDS when JWDPD details are agreed.

The planning delivery grant (PDG) may not be awarded, or the award may be reduced, in the event that delivery of any LDD fails or is significantly delayed. The JWDPD is vulnerable to delay as it is required to be agreed by each authority's Full Council. How this might affect the PDG awarded to each authority is not currently known.

The risk to failure of delivery, and subsequent reduced PDG, can be managed through two related actions. First, that there is effective dialogue between the Joint Committee and Steering Group and their respective authorities. Even where decisions are not being made by Full Councils, they should be fully informed of progress and involved in decision making (ie raising concerns early in the process). Second, recognition by each authority, within its own LDS, that delay incurred by its own Full Council is beyond the control of the other authorities within Greater Manchester.

It is strongly recommended that JWDPD details are discussed with GONW and the Planning Inspectorate to ensure the proposed actions and resource implications are fully explored, before LDS submission.

#### **Preliminary Task 4:**

- a) Commitment from each authority to delay submission of its LDS until appropriate details for the JWDPD have been agreed - or where it is submitted, commitment that the LDS will be updated with agreed details of the JWDPD at the earliest opportunity.**
- b) Prepare appropriate details of JWDPD within a timescale to enable inclusion into the revised LDS.**
- c) Recognition that delay incurred by one authority's Full Council in regard the JWDPD is beyond the control of the other authorities.**
- d) Discuss proposed timetable with GONW & PINS prior to inclusion in LDS.**

#### **Test of Soundness**

- i: JWDPD must be developed in accordance with the LDS.**

**Cross working:** Links with establishment of Joint Committee (*Preliminary Task 3*) arrangements of annual monitoring (*Preliminary Task 7*) and service level agreement with Planning Inspectorate (*Preliminary Task 8*).

PPS 12 seeks coherence and consistency within and between DPD prepared by authorities and their neighbours, where cross boundary matters are relevant. It is important that the JWDPD is consistent with national planning policy and in conformity with regional planning policy, and each authority's core strategy.

PPS 10 seeks to ensure that waste management is integrated with other spatial planning concerns. Each of the authorities within Greater Manchester is developing a range of thematic DPD, area action plans and supplementary plan documents. It will be necessary to ensure that these local development documents do not compromise the ability to provide the necessary waste management facilities in appropriate locations.

The JWDPD must be prepared with reference to each authority's community strategy. It is assumed that approximately one day per month throughout DPD production will be allocated to *Task 5*.

**Preliminary Task 5: (ongoing)**

- a) Establish line of communication with Policy Officer <sup>(1)</sup> at AGMA to ensure consistency within and between core strategies and other DPD.**
- b) Ensure effective dialogue between GMGU and all authorities Joint Committee and JWDPD Steering Group.**
- c) Ensure policies developed are in general conformity with national and regional policy through regular dialogue with GONW, NWRA and WDA, including representation on JWDPD Steering Group.**

It will be necessary for each authority to include strategic waste related policy within its core strategy. This policy will need to be consistent across Greater Manchester. The JWDPD is a thematic DPD within each authority's local development framework, containing key principles, site allocations and development control policy.

Whilst each core strategy need not be identical, it is important that they are consistent and compatible. The decision-making structures must work when put alongside one another and the JWDPD. A scope of policies document for waste related strategic policy should be prepared by GMGU and made available to all authorities. This document would not have any statutory function, but should be referred to by each authority in preparing its core strategy. This will enable consistency throughout each authority's core strategy.

The detail of the document should be discussed within the Steering Group. However, relevant policy would be expected to draw heavily on the key planning objectives within PPS 10 and apply these at an appropriate local

(1) Jeff Lee

level. It should also be informed by some of the evidence that will be gathered in preparation of the JWDPD; for example whether to seek to meet or exceed waste management targets.

This task is included in this section as a preliminary task because it is not formally a technical function of DPD production. However, it is expected that the scope of policies document would be informed by the evidence gathering tasks.

Having reviewed each authority's LDS and spoken to those authorities that have already started preparing their core strategy,<sup>(1)</sup> the scope of policies document should be prepared by the end of March 2006. In this way it can be effectively deployed as a consultation response from GMGU to the authorities of Bury, Manchester and Tameside. The document should also be sent to the other authorities requesting that it is used to develop their core strategy.

**Preliminary Task 6: Prepare scope of policies document for waste related strategic policy to be used in preparing each authority's core strategy.**

**Test of Soundness**

**iv and v:** Requires consistency with national planning policy, conformity with regional planning policy, with proper regard to other plans, policies and strategies including the community strategy.

**vi:** Requires coherence and consistency within and between DPD.

**Signposting:** Development Plan Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents, Planning Inspectorate, December 2005

## 2.4

### *ARRANGEMENTS FOR ANNUAL MONITORING*

PPS 12 expects that consideration will be given to monitoring arrangements early in the plan making process, that it is not seen as a 'bolt-on' exercise. Preparation of an annual monitoring report (AMR) is a statutory requirement under the Planning and Compulsory Purchase Act 2004. Production of an AMR covering both JWDPD production and implementation will remain the responsibility of each authority.

Progress made in producing the JWDPD is a measure likely to be used in awarding PDG. A framework should be produced and agreed by the Steering Group so that the GMGU can submit relevant information to each authority when preparing their AMRs.

The JWDPD will include proposals for monitoring that would be used by each authority in implementing the JWDPD. Arrangements for annual monitoring

(1) Bury, Manchester and Tameside

should be in compliance with the legislative requirements. Two distinct, but interlinked, sets of indicators should be used, based upon the monitoring requirements of the JWDPD policies and key issues identified through the sustainability appraisal (SA). In this way, both the level of effectiveness of the adopted policies can be monitored, as well as the effect of implementing those policies.

**Preliminary Task 7:**  
Establish annual monitoring framework for JWDPD production progress. Developing appropriate monitoring of the JWDPD is included at Production Tasks 4 & 6.

**Test of Soundness viii:** JWDPD to include clear mechanisms for monitoring.

**Signposting:**  
The North West Plan  
PPS 10 Companion Guide – Section 3

**Cross working:** Links with including JWDPD details in each authority's LDS (Preliminary Task 4).

## 2.5

### *SERVICE LEVEL AGREEMENT WITH THE PLANNING INSPECTORATE*

It is expected that the JWDPD will have a separate independent examination. As such a service level agreement (SLA) will be required with the Planning Inspectorate.

The Planning Inspectorate has indicated that it will establish a SLA with whoever is taking the lead in producing the JWDPD. As a Joint Committee is being set up to oversee production, they have advised that they will enter into the SLA with them.

**Preliminary Task 8:** Establish SLA with Planning Inspectorate.

**Cross working:** Links with establishment of Joint Committee (Preliminary Task 3) and including JWDPD details in each authority's LDS (Preliminary Task 4).

### 2.5.1

#### *The Name of the JWDPD*

Regulation 13(3) of the Town and Country Planning (Local Development) (England) Regulations 2004, states that the title of a local development document must:

- name the local planning authority by which the local development document is prepared;
- indicate whether the document is a DPD or a SPD; and

- have a sub-title that indicates the subject matter and date on which it was adopted.

It is clear that each of the ten authorities will have to be clearly named within the formal title of the JWDPD, along with clarification that it is a thematic DPD dealing with waste management. A shortened title could also be used for ease of general reference, which might be along the lines of 'The Greater Manchester Joint Waste Development Plan Document'.

The name of the JWDPD should be agreed at the earliest opportunity in order to provide clear presentation in all consultation initiatives. If the Joint Committee has not been established, then this task could fall to the Steering Group.

**Preliminary Task 9: Establish name of the JWDPD.**



This section outlines a series of linked tasks as set out in the PPS 12 Companion Guide:

1. developing evidence base and scoping sustainability appraisal;
2. preparing issues and alternative options;
3. preparing the preferred options document and formal SA report; and
4. addressing representations on preferred options and preparing the submission development plan document and SA report.

### 3.1.1 *Scope of the JWDPD*

ODPM advice is clear in that each authority can have only one core strategy and that the JWDPD must be in conformity with that core strategy.

The JWDPD should be one document containing both key principles of waste planning and site specific allocations. Each authority's core strategy should include strategic waste planning policies; these must be consistent across Greater Manchester. *Preliminary Task 6* deals with preparing strategic waste related policy to be included in each authority's core strategy.

## PRE PRODUCTION/ EVIDENCE GATHERING

### 3.2 *ENABLING COMMUNITY ENGAGEMENT*

Particularly in the early stages of JWDPD production it will be necessary to engage communities with technical work. This will need to be undertaken efficiently and with a minimum lead in time. To this end a supplementary task has been included at the pre-production stage of making contact with appropriate local groups and stakeholders as identified through preparation of the consultation strategy and in discussion with the Greater Manchester planning authorities and the two WDA.

**Supplemental Task: Make contact with appropriate groups and stakeholders in order to inform them of the JWDPD and find out how they would like to participate in its production.**

### 3.3 DEVELOPING EVIDENCE BASE AND SCOPING SUSTAINABILITY APPRAISAL

#### 3.3.1 *Drawing upon and developing the evidence base*

##### *Review of existing policies*

The planning system enables policies adopted within each authority's unitary development plan (UDP) to be 'saved' for a period of up to three years from commencement of the Planning and Compulsory Purchase Act 2004. Advice in the Planning Officers' Society consultation document 'Policies for Spatial Plans' suggests that, in preparing DPD, planning authorities should not simply rewrite previous policy, but take on board fully the opportunity of preparing a modern and credible policy framework.

Notwithstanding this advice, there is still merit in identifying waste related policy as currently adopted across Greater Manchester, as part of the evidence gathering phase. This work will: inform the policy context in preparing the JWDPD; assist an understanding of how decisions will be considered in the interim period; and identify policies that are considered to work well or poorly.

A review of other context documents is also required, to include:

- national policy - Waste Strategy 2000 (including the consultation draft of revisions, published February 2006) and PPS 10;
- The North West Plan;
- Municipal Waste Management Strategies - as produced by Greater Manchester WDA and Wigan Metropolitan Borough Council; and
- Community Strategies for each authority.

This work will:

- identify appropriate building blocks and relevant information;
- make best use of information/research already undertaken;
- identify issues relevant to AGMA and to each authority; and
- identify other plans/programmes that are relevant to waste that could be enabled through JWDPD.

**Pre Production Task 1: Review existing plans, policies and strategies.**

**Test of Soundness iv and v:** Consistency and conformity with national and regional planning policy and community strategy.

**Signposting:** PPS 12 Companion Guide - section 5.4, page 38

**Cross working:** This task will also be relevant to the scoping report of the SA and *Pre Production Task 5*.

A purpose of the regional spatial strategy (RSS) is to apportion the tonnage of wastes required to be managed by each waste planning authority within the Region. This applies only to municipal waste and commercial and industrial (C&I) waste. The apportionment should be expressed in annual rates, but these may vary over the plan period. The rates are not intended to be a detailed forecast, but to provide a benchmark for the preparation of local development documents.

Essentially, the RSS should comprise a distribution of waste tonnage requiring management and a pattern of waste management facilities of national, regional or sub-regional significance. PPS 10 expects the adopted RSS to be carried forward into local development documents. Consequently, in preparing the waste core strategy, there will not be a need to reopen consideration of either the principles of the policy or the annual rates of waste to be managed.

The North West Plan, submission draft of the Regional Spatial Strategy for the North West of England (January 2006) identifies some of the key drivers steering a reduction in the reliance on landfill and its replacement by alternative reprocessing, treatment and disposal facilities and refers to the Regional Waste Strategy (September 2004) as setting out the overall approach to the required changes. The same indicative capacity requirements for municipal, C&I and hazardous wastes across the North West per year to 2020 are presented in both documents. However, the documents do not identify a pattern of waste management facilities as required by PPS 10. Instead, credible work undertaken in production of the JWDPD can be used to inform this pattern when it is developed.

#### *Waste data collection & use and identifying capacity requirements*

There is an issue of confidence over data. Information in relation to the creation and management of municipal waste has improved significantly over the past five years and is now readily available at the authority level. However, the same situation does not exist for other waste streams. Within Greater Manchester this is expected to be an issue particularly in relation to C&I waste, construction and demolition (C&D) waste and hazardous waste. Other wastes that should be considered include agricultural waste, clinical waste and waste water.

In preparing the JWDPD, the GMGU should use existing sources of data wherever possible. Municipal waste data should be sourced from the two WDA; whilst the Environment Agency will contribute information on other controlled waste streams.

A **forecast of waste growth** over the plan period will be necessary to inform the JWDPD. Methods for forecasting waste arisings are provided in the PPS 10 Companion Guide but may be based on a number of factors including:

- historical waste arisings trends;
- economic development indicators;

- population forecasts;
- housing growth forecasts;
- patterns of commercial and industrial development; and
- implications assumed from WDA waste minimisation initiatives.

The WDA are expected to have completed relevant work that should be used to inform JWDPD production.

A **capacity review** will indicate the level of development required to deliver the necessary waste management infrastructure. It is understood that GMGU has already started on this task.

A **need assessment** will identify the level of new waste related development required throughout Greater Manchester. It is important to remember that the number and scale of sites required will be dependent on: the size and scale of each facility; whether any one facility is able to manage more than one waste stream; and whether facilities may be co-located on any one site.

The need assessment may consider a number of alternatives for delivering the required capacity. However, at this stage the need assessment should be providing evidence on which to identify issues and options. The SA and political and public involvement during the issues and options tasks should be used to make decisions on how that required capacity should be provided.

Relevant evidence should be gained from an understanding of existing capacity supplemented by:

- understanding of industrial/urban land availability – discussion/information from district authorities (need also to understand their competing demands), reference to National Land Use Database; and
- reference to ‘Planning for waste facilities: A research study’, ODPM, 2004 for assumptions of site requirements for, and impacts from, facilities.

Spurious precision should be avoided in identifying capacity requirements and in forecasting growth. Instead, confidence should be sought in the information available, with gaps in knowledge identified and reduced in developing and monitoring the JWDPD. This method of working allows progress in preparing the JWDPD to continue, with reviews undertaken if and when significant differences or change circumstances are identified. The GMGU has already embarked upon a capacity study and this will identify where the significant gaps in facility provision exist.

**Pre Production Task 2:**

- Understand waste arisings and forecast waste growth.**
- Understand current waste management capacity.**
- Undertake need assessment.**

**Test of Soundness vii:** Ensure JWDPD is prepared on robust and credible evidence base.

3.3.2

*Consideration of objectives, especially need for general conformity with regional spatial strategy*

The following short, medium and long term objectives have been identified in preparing the strategy for preparation of the JWDPD. They build upon the key planning objectives of PPS 10 and establish the aspirations of the JWDPD:

- to inform, and be informed by, the municipal waste management strategies;
- to engage effectively with communities, enabling them to take responsibility for their own waste;
- to provide a sound framework within which to bring forward appropriate development;
- to be in general conformity with other DPD and the RSS; and
- to be visionary, looking to sustainable development in the longer term.

This list should also be informed by the objectives identified in the SA.

**Pre Production Task 3: Review, and update as necessary, objectives for the JWDPD.**

**Test of Soundness iii: JWDPD subjected to SA.**

**Cross working:**

The SA will identify sustainability objectives that should inform preparation of the JWDPD.

This task also requires clarity on how the JWDPD fits within the local development frameworks produced by the authorities and regional spatial strategy and what is expected of it. This should be completed as part of *Preliminary Tasks 3 & 6*.

This task is the start of outputs generated in *Pre Production Task 6*.

3.3.3

*Consider implications of other local strategies and initiatives*

Much of this task will have been completed in undertaking *Pre Production Task 1* (the review of existing policy and context documents, *Section 3.3.1*). PPS 12 requires particular focus on community strategies with local development frameworks recognised as the relevant land use delivery mechanism. In specific regard to the JWDPD, there is also a need to focus on the municipal waste management strategy (MWMS).

**Pre Production Task 4: Ensure community strategies and MWMS inform preparation of the JWDPD.**

**Test of Soundness iv and v:** Conformity and consistency with national and regional policy and community strategy.

**Signposting:**

PPS 12 Companion Guide – checklist 8a, pages 89 & 90

The relationships between community strategies and local development frameworks, ODPM, October 2003

**Cross working:** This task will be underpinned by *Pre Production Task 1*.

### 3.3.4

#### *Scope Sustainability Appraisal: Stage A*

The SA should be integral to the preparation of the JWDPD. It should inform the policy development process and influence land allocations. It must also incorporate the requirements of the SEA Directive.<sup>(1)</sup> Figure 4 of SA guidance<sup>(2)</sup> shows the SA process alongside the DPD production process. The SA should be undertaken at a level appropriate to the plan being assessed. However, it will be necessary to ensure that all relevant issues, indicators and objectives are identified at this early stage of DPD production, so that the baseline information and resultant Scoping Report will be useful to the development of all policy.

The GMGU should refer to appropriate partners (NWRA, the ten planning authorities and the two WDA) to collate any information that they have already gathered. Where gaps in information are recognised, the GMGU is not expected to undertake the necessary research to fill them. Instead, it should work with partners and external organisations to fill these gaps over time. Regard should also be given to the SA undertaken as part of RSS preparation. As the RSS has recently been submitted, it should provide a strong lead in terms of strategic issues and objectives, and be able to contribute up to date information.

Statutory consultees must be consulted on the scoping report for a period of five weeks. The report may also be made available to other consultees, with submission to each of the ten authorities recommended. If the Joint Committee has not been established by this stage it will be particularly important to ensure the scoping report is taken to each authority for consultation; it is assumed in this project plan that officer approval (through the Steering Group) will be acceptable for its publication.

**Pre Production Task 5:**

**a) Prepare the SA scoping report.**

**b) Consult on Scoping Report and address comments received.**

(1) European Union Directive 2001/42/EC.

(2) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. ODPM. November 2005. Figure 4, page38.

**Test of Soundness iii:** JWDPD subjected to SA.

**Signposting:**

Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005 – Figure 7 on page 42 provides advice on public involvement in both SA and DPD production  
PPS 10 Companion Guide – Section 3 and Annex A

3.3.5

*Agree a spatial vision and define spatial objectives*

The spatial vision is intended to emphasise local distinctiveness and to provide a focus for delivery. In regard to the JWDPD, this might identify key areas of growth within Greater Manchester and critical links with waste planning, including linkages with other non waste related development.

The spatial objectives should be clearly defined and measurable. They should be derived from the spatial vision (to reflect local circumstances) but build upon national and regional planning policy objectives and other relevant strategies (eg community strategy and MWMS).

**Pre Production Task 6: Draft a spatial vision and define spatial objectives. These should be drafted with stakeholder groups in the first instance, but reviewed through wider consultation initiatives.**

**Test of Soundness**

**vi:** Coherence and consistency within and between DPD.

**viii:** JWDPD to include clear mechanisms for implementation and monitoring.

**Cross working:** The spatial vision and objectives should be underpinned by work undertaken in *Pre Production Tasks 1 to 5*.

**Supplemental Task:** Prepare a factsheet containing essential pieces of information in regard the JWDPD (eg amount of waste in Greater Manchester, national policy requirements, indications of technologies). Responses could be invited to the document, although it need not be a formal consultation.

This is not a statutory requirement but would publicise the work going on, inform communities of relevant information and start to get them involved. It could also be used to publicise and review the spatial vision and objectives.

3.4 *PREPARING AND ASSESSING ISSUES AND ALTERNATIVE OPTIONS*

3.4.1 *The Issues and Options*

In regard to the JWDPD, three key strands of issues and options can be identified that are inter-related:

- key principles;
- location principles; and
- site alternatives.

*Key Principles*

The issues will be recognised through the evidence gathered previously, and might be expected to include, amongst others:

- matters of evidence – waste produced, growth forecasts, capacity requirement, LATS, and land availability;
- seeking to achieve or exceed national/regional targets;
- different types of waste technology - but avoiding this as an issue for discussion as national policy does not suggest DPD should abandon any one type of technology;
- site alternatives – use of Green Belt/Green Wedges, urban/rural;
- scale of facilities – large/small, centralised/dispersed; and
- location principles.

Relevant options will be identified through recognition of the issues, but further suggestions for both issues and options should be encouraged through community involvement. The SA scoping report might also indicate issues that should be considered.

*Location Principles*

Location preferences, for new or expanded facilities, should be considered as part of developing key principles for the JWDPD; and must be established first in order to provide a robust basis on which to identify specific sites. In practical terms too, a discussion of specific sites or areas in the first instance should be avoided, otherwise interest in strategic issues is likely to be lost.

Issues relevant to location principles are likely to include:

- consideration of principle to expand existing sites, co-locate waste facilities and/or co-locate waste facilities with other suitable industries eg eco parks/resource recovery parks;
- consideration of options for co-locating facilities and shared use between authorities - this might include the implications for sustainable transport of waste and consideration for use of canal or rail;



- reference to 'The Planning Response to Climate Change: Advice on Better Practice', ODPM, 2004 in regard the need to adapt for climate change and reduce greenhouse gas emissions;
- identification of 'showstopper' criteria (eg buffer zones between sensitive receptors, minimum distances to housing or access arrangements) but recognition of where they apply to avoid blanket application across Greater Manchester; and
- enhance positive and minimise negative aspects of waste management – eg identify difference between clean and dirty facilities as this may affect general location principles.

Consideration of location preferences should include an assessment of impacts from any proposed option and whether the preferred location types and/or indicative broad areas are deliverable. This has a direct link with the site specific work.

### *Site Specific*

Evidence gathering and discussion of key principles will provide useful indicators for site selection such as: capacity requirements; preferred locations including types of land for waste development; potential for co-location; and mix of large/small facilities.

Information on all potential sites should be sought from each planning authority (including sites in existing waste uses) the two WDA and the waste industry. Work undertaken for the capacity review (*Pre Production Task 2b*) will also be useful as all waste sites with planning permission gained in the last five years should have been identified, dealing with one area of search.

It is hoped that this would result in a long list of sites that show some potential for waste related development. This long list should be reduced through sieving out unsuitable locations. Examples of suitable sieves might include: whether site is available; site size (sites of less than 0.5 ha might be expected to gain planning permission through use of criteria based policy and probably do not need to be allocated); showstopper criteria (where appropriate); and Green Belt/Green Wedges designation (although this may need reviewing depending on number of sites). The SA might also indicate relevant sieves to use in shortlisting site options.

It may be beneficial to consider areas rather than specific sites at this stage, building in flexibility and deliverability at the outset. Areas might include: industrial estates, considering the suitability of plots in general; disused locations such as old factories; or waste water treatment facilities. Additional site suggestions may also be gained from other political and public stakeholders (eg in Surrey, a parish council suggested a site it considered to be suitable).

PPS 10 advises that planning authorities should avoid unrealistic assumptions on the prospects for delivering particular sites in regard to their development potential and ownership constraints.<sup>(1)</sup> Reasons why a site may not be delivered might include: alternative development of site is already in progress; owner might not relinquish site for waste related development; or development is dependent on something else happening, for example road improvements.

Ownership constraints can have a significant impact on delivering suitable sites. These are best managed by involving owners in preparation of the JWDPD. In appropriate circumstances, the authorities could also use their compulsory purchase powers.

### 3.4.2 *Sustainability Appraisal: Stage B*

The SA should be used to explore different options for delivering the identified waste management requirements. This should include those issues and options raised through community involvement. Those that do not offer genuine choices (eg only drafting policy for municipal waste) or realistic options (eg policy indicating preference for landfill) should be discounted.

*Section 3.2.4* identifies that the SA should be applied as appropriate to each level of DPD production. This advice is reiterated in the SA guidance<sup>(2)</sup> at paragraph 3.3.1, which states that at the issues and options phase *'the LPA appraises in broad terms the effects of strategic options and then in more detail the effects of the preferred options when these have been selected.'*

The SA guidance provides a significant amount of guidance on how to undertake options appraisal. The JWDPD should set out to improve on the situation if there were no DPD and aim to improve on the effects of the 'saved' UDPs. Options analysis may include no change scenarios in order to provide a comparative baseline for other options. It is important to remember that baselines will change over time with no change options, as well as with those options proposed for a new DPD.

It is also important to recognise this process as iterative and involving community and stakeholder engagement. Assessing the key and location principles through the SA will inform the type, number and range of sites that will need to be identified. The SA may also identify indicators for use in the site sieving exercise. As each option is refined, a comment on the key sustainability issues and problems arising must be prepared, with recommendations on how each of the options could be improved, unless they have been dropped from further consideration.<sup>(3)</sup>

(1) PPS 10. Paragraph 18. Page 11. ODPM, July 2005.

(2) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. ODPM. November, 2005.

(3) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. ODPM. November, 2005. Paragraphs 3.3.9 & 3.3.10, page 48.

The SA can be used effectively in two ways when appraising site specific options. First, it should inform the evaluation criteria used in the specific site assessments. Second, it can provide a strategic level of assessment, to enable an understanding of the more widespread impacts from site options. In this way it can use and develop the site specific analysis, rather than repeat the work and risk contradiction.

Some suggested options for appraisal might include:

- the number and size of major treatment facilities used to manage waste;
- the approach to permitting waste-related development in the Green Belt/ Green Wedges; and
- different sites identified for waste-related development.

This analysis might lead to strategic conclusions such as

*'Having a larger number of smaller treatment facilities will reduce waste transport distances, although it may also be more difficult to deliver than fewer but larger facilities.'*

Or

*'Having greater scope to locate facilities in the green belt provides only one wider sustainability benefit, in increasing the deliverability of sufficient facilities. However, there is also a drawback in terms of protection and enhancement of landscape and open spaces'.*

These strategic conclusions can be used to choose between combinations of sites and to draft site specific policy, as well as development control matters.

A detailed assessment is only expected to occur once a shortlist of sites has been identified.

### **3.4.3 Issues and Options Consultation**

Paragraph 8.3 of the PPS 12 Companion Guide recognises that *'Regulation 25<sup>(1)</sup> requires authorities to ensure development plan documents are genuinely front-loaded by informally involving communities in the development of issues and alternative options. This involvement should be a continuous process ... rather than one discrete exercise'*.

The consultation strategy will provide greater detail on how the issues and options consultation may be conducted. For the purposes of the project plan it is assumed that a series of events/workshops/reports/factsheets will be undertaken/made available that focus on the issues and options outlined at

(1) The Town and Country Planning (Local Development) (England) Regulations, 2004.

*section 3.3.1.* In this way the community can be engaged throughout the development of options for waste management policy within the JWDPD.

It will be necessary to engage with political and public stakeholders, eg statutory consultees, waste industry, WDA, town councils/ townships etc. However, the consultation strategy may consider referring to different groups for different stages of the issues and options phase of JWDPD production.

Expected issues for consideration in regard key and location principles have been outlined in the bullet lists in *section 3.3.1.* Discussion of issues and options should focus on these principles before moving onto specific site issues and options.

In terms of site specific issues and options, consultation might focus upon:

- the criteria to be used to undertake a detailed assessment of the shortlisted sites (criteria at PPS 10 Annex E and as identified in the SA should also be used);
- the number and size of major treatment facilities used to manage waste;
- the approach to permitting waste-related development in the Green Belt/ Green Wedges;
- different sites identified for waste-related development; and
- comment on the shortlisting exercise undertaken.

#### **Production Task 1:**

- a) Engage with community to identify issues and options.**
- b) Prepare issues and options and undertake SA.**
- c) Engage with community in accordance with consultation strategy (Regulation 25).**

**NOTE: A phased approach should be used so that discussion can be focussed on each strand of issues and options. Start with key principles, working through location principles to identify site specific matters, whilst recognising inter-relationship between each.**

#### **Test of Soundness**

- ii: JWDPD has been prepared in compliance with SCI.**
- iii: JWDPD subjected to SA.**
- vii: Need to consider relevant alternatives and that they are founded on a robust and credible evidence base.**

#### **Signposting:**

PPS 12 Companion Guide – paragraph 8.3, page 91 and table 7.3, page 80 – 83  
Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005  
PPS 10 Companion Guide – Sections 3 & 5 and Annexes A & B

### 3.4.4

#### *Managing consultation responses at the Issues and Options stage*

How community involvement is undertaken throughout the process will be determined through the consultation strategy. Consultation undertaken at this stage is informal and does not have a statutory role at the independent examination. However, it would be beneficial to establish a method of recording comments received, enabling non-discretionary consideration of them, perhaps through giving each respondent a code and recording this response/decision on how the comment has been used in preparing the JWDPD. This database would contribute to the audit trail of how communities have been involved in the plan making process. It would also indicate how opinions might have changed over the plan making process. An example database is provided at *Annex A*.

#### **Production Task 2:**

- a) Record responses on database.
- b) Address responses and audit how they have been used to inform production of JWDPD.

**Supplemental Task:** Effective dialogue with communities also involves feeding comments back. This could be achieved by publishing the database indicated above (although comments from the community should be non-attributable) or preparing a report that outlines the comments made and how they have been used in preparing the JWDPD. An example of this type of report is provided at *Annex B*.

### 3.5

#### *PREFERRED OPTIONS DOCUMENT AND THE SUSTAINABILITY APPRAISAL REPORT*

The preferred options document should build upon previous stages and set out the proposed policy direction, together with relevant issues and proposals, including description of preferred sites and the type(s) of waste management facility that would be appropriate. Alternative approaches should also be indicated where appropriate. It will be accompanied by the SA report; this is a key output of the appraisal process.

A **detailed site assessment exercise** will need to be undertaken in order to show the preferred locations, and ensure that the preferred route for waste management can be delivered within Greater Manchester. If alternative approaches are available these should be taken through SA.

The development potential of a site can be managed through two methods. Firstly, whilst a site allocation policy should provide clarity on the site's purpose, it should not be so prescriptive so as to stifle innovation in line with the waste hierarchy, so as to enable alternative, but still appropriate, development. Secondly, there is a further opportunity for community involvement, especially in regard to larger sized or more derelict sites, with consideration given to adding value or identifying measures that would make development of a site acceptable (eg restoration of adjacent land or provision

of a conservation area with long term management provided by the developer).

A good understanding of how a preferred waste management infrastructure can be delivered should have been achieved. As such, relevant **development control criteria** can also be considered and presented in the preferred options document.

Previous ERM experience indicates that by this stage the community is expecting to see a draft DPD; although advice in PPS 12 Companion Guide indicates that policies are not expected to be drafted until preparation of the submission document. SA must be used to inform the proposed policy direction. A benefit of preparing a draft DPD is that it will demonstrate explicitly the proposed policy direction to the community. This approach appears to conflict with policy guidance. This might be managed by preparing the document in the format that the JWDPD is expected to take, including appropriate title headings, but instead of drafting policy use explicitly worded options that can be cross referenced with the SA report.

It is recommended that Full Council of each authority is consulted on the preferred options document.

**The preferred options document must:**

- stress unique circumstances and characteristics of the area;
- be consistent with national planning policy and in general conformity with regional planning policy;
- have regard to the community strategy;
- be in conformity with the core strategy (where applicable) and consistent with other LDDs;
- set out a comprehensive approach;
- propose deliverable options; and
- go through formal consultation (six weeks) accompanied by the formal SA report.

**Production Task 3:**

- a) Undertake detailed site appraisal, develop development control policies and work toward preferred options.**
- b) Subject options to sustainability appraisal.**
- c) Prepare the preferred options document and SA Report.**
- d) Consult formally on preferred options document and SA report (Regulation 26).**
- e) Submit preferred options document and SA Report to each authority's Full Council.**

**Test of Soundness: All.**

**Signposting:**

PPS 12 Companion Guide – paragraph 8.4, pages 91 – 95

Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

PPS 10 Companion Guide – Sections 3 & 7 and Annexes A & B

**Supplemental Task:** Include monitoring proposals in the preferred options document, although they are not required until submission document. A monitoring and implementation framework that establishes clear objectives for achieving delivery is a key part of the JWDPD. It should not be considered as a bolt-on addition to the plan making process. Including proposals for monitoring at this stage will ensure a suitable framework is integral to production of the JWDPD. It might also highlight areas of the JWDPD that would be subject to inflexibility and that might need to be modified prior to submission.

**3.6*****ADDRESSING REPRESENTATIONS TO THE PREFERRED OPTIONS DOCUMENT***

This stage of the process is clearly explained in PPS 12 Companion Guide, incorporating advice on the following tasks:

- establish a consultation database;
- analyse representations;
- use SA to reassess options;
- respond to or meet those who submitted representations; and
- report to relevant Cabinet or committee member(s).

**Production Task 4:**

- a) Establish database of respondents and comments made.**
- b) Address responses made to preferred options document.**
- c) Use responses and SA to produce submission document.**

**Test of Soundness**

**ii:** JWDPD must be prepared in accordance with The Town and Country Planning (Local Development) (England) Regulations 2004 as a minimum.

**iii:** JWDPD subjected to SA.

**vii:** JWDPD represents best strategy/policy/allocation having considered relevant alternatives that have been based on robust and credible evidence.

**Signposting:**

PPS 12 Companion Guide – paragraph 8.5, page 95 – 97

Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

**Supplemental Task:** This is another opportunity to maintain effective dialogue with with communities by providing feedback.

At this stage, a report outlining the received comments and how they have been used in preparing the JWDPD is considered most appropriate as the database of response might be too large and unwieldy, or require too great a level of detailed consideration to present prior to preparation of the submission document.

### 3.7 *PREPARING THE SUBMISSION DEVELOPMENT PLAN DOCUMENT AND NEED FOR AMENDMENTS TO THE SUSTAINABILITY APPRAISAL REPORT*

It is at this stage that the PPS 12 Companion Guide suggests drafting policies. Policies should be positively worded and accurately reflect the preferred options developed through the plan making process. PPS 12 states clearly how the reasoned justification supporting each policy should be prepared (paragraph 3.21).

The PPS 12 Companion Guide provides comprehensive advice in undertaking this task and identifying good practice pointers. In preparing the submission document the following key tasks are necessary:

- effective editorial supervision;
- making the most of external resources, including PINS and GONW;
- preparation of a statement of compliance;
- consideration of the need to amend the formal sustainability appraisal report – SA is an iterative process throughout plan making and monitoring;
- preparation of monitoring proposals; and
- preparation of a key diagram/proposals map.

The submission document must also be accompanied by the SA Report and the consultation statement.

The Full Council of each authority will need to agree the submission document prior to submission.

A map may be produced for the whole of the Greater Manchester area to show the spread of proposed facilities and strategic issues, such as Green Belt, AONB and primary transport routes. However, each planning authority must include the specific locations of facilities on their own proposals map. These will also need to accompany the submission document.



### **Production Task 5:**

- a) Sustainability Appraisal.
- b) Draft policies.
- c) Production of the submission document, including monitoring proposals and map.
- d) Ensuring each authority's proposals map is amended as appropriate.
- e) Preparation of statement of compliance with SCI.
- f) Approval by each authority's Full Council.

### **Signposting:**

- **General**
  - PPS 12 Companion Guide – paragraphs 8.6 – 8.10, pages 97 – 105
  - Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents, ODPM, November 2005
- **Policy Drafting**
  - Policies for Spatial Plan (consultation document), Planning Officers Society, July 2004. [www.planningofficers.org.uk/](http://www.planningofficers.org.uk/)
- **Monitoring Proposals**
  - PPS 10 Companion Guide – Section 4
  - Local Development Framework Monitoring: A Good Practice Guide, ODPM, March 2005
  - Annual Monitoring Report (AMR) – FAQs and Seminar Feedback on Emerging Best Practice 2004/05, ODPM, September 2005
  - The North West Plan
  - Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

### **Key points in drafting waste related planning policy**

- Given that an increase in waste management capacity is likely to be required, it would be beneficial to look for positive criteria for locating facilities rather than constraints.
- Site allocation policy should indicate the type of development that is expected, but should not be inflexible in permitting alternative but appropriate facilities, or those that lie higher up the waste hierarchy.
- 'Showstopper criteria' – those that write-off the possibility of siting a new waste facility – should be kept to an absolute minimum and should not be applied through a blanket approach to all areas. Different sizes and types of facility and waste type may be suitable in a range of locations eg extensions to existing facilities in the green belt; smaller, cleaner facilities in closer proximity to residential areas.
- Opportunity cost of providing new waste facilities as opposed to higher value uses eg commercial development in close proximity to airport, regeneration proposals, is a significant constraining factor. Effective delivery mechanisms need to be established and the critical message that new waste facilities are needed needs to be 're-packaged' to get buy-in at member & community level.

- Development control policies should be included within the JWDPD to ensure a consistent framework across Greater Manchester, and to ensure that development control issues particular to waste management are covered adequately.

Once agreed by each authority's Full Council the Submission Document can be submitted to GONW, along with the statement of compliance with SCI. Formal consultation is required on the submission document, and representations will need to be reviewed and summarised prior to independent examination.

**Production Task 6:**

- a) Submit document and SA report. (Regulation 28)**
- b) Statutory consultation. (Regulation 29)**
- c) Representations on submitted JWDPD. (Regulation 31)**

## EXAMINATION AND ADOPTION

### 3.8

#### *DEVELOPMENT PLAN DOCUMENT EXAMINATION AND ADOPTION*

At this stage the plan-making process is significantly prescribed by Regulation. This is unpacked comprehensively in the PPS 12 Companion Guide at Section 9. Representation from all the planning authorities should be expected throughout the independent examination.

**Examination Task 1:**

- a) Examination Preparation**
- b) Pre-Examination Meeting**

**Supplemental Task:** Prepare a factsheet outlining the process that has occurred and key decisions made in the plan making process. Disseminate the factsheet widely throughout Greater Manchester. This will ensure that any part of the community with an interest in the process will be kept informed, which will be useful in enabling continuous engagement through implementation, monitoring and review of the JWDPD.

**Examination Task 2:**

- a) Independent Examination**
- b) Binding Report and making subsequent changes to JWDPD.**

### 3.8.1

#### *Adoption*

The Full Council of each planning authority will need to agree the adoption document prior to adoption. Each authority's proposal map, as amended to reflect the JWDPD site allocations, should also be agreed by Full Council.

**Adoption by each authority's Full Council.**

The preliminary and production tasks identified in *Section 3* indicate how the GMGU and Joint Committee will seek to ensure that the JWDPD will be in conformity and consistency with local development documents produced by each authority. It will also be necessary for each authority to consider how it will accommodate the JWDPD within their local development frameworks.

This would be effectively managed through the following suggestions:

- LDS will need to programme in arrangements that allow for joint preparation of JWDPD;
- SCI will need to support and not act as a barrier to joint consultation arrangements;
- proposals for monitoring arrangements will need to accommodate reporting on waste planning;
- co-ordination between district core strategies to ensure there is recognition that waste planning is to be taken forward at a strategic level through joint planning arrangements; and
- district LDD need to be supportive and not in conflict with waste DPD policies.

All of the above would be most effectively enabled though the establishment of strong waste champions and regular dialogue between the authorities.

### 5.1 ESTIMATED TIME AND COST FOR TASKS

*Table 5.1* summarises the time estimated to be required for each task. These tasks may be undertaken by either GMGU or consultant resource. The number of days attributed to each task has been gained from *Table 5.4*.

It is important to remember that these days are allocated for undertaking the technical tasks only. They take no account of additional work that is required to ensure delivery of the JWDPD including: general project management; consultant management; dealing with queries from general public; administration; preparing reports for committee; Joint Committee meetings; Steering Group meetings; etc. This arrangement is similar to that developed at the Berkshire Joint Strategy Unit, where a central team is responsible for DPD delivery, but is supported as necessary by consultancy resources.

*Table 5.1 Summary of time required for tasks*

Task Type	Number of days
Preliminary Tasks	182
Pre Production Tasks	145
Production Tasks	492
Examination & Adoption	130
Consultation	167
Supplemental	55
<b>Total</b>	<b>1171</b>

Assumptions:

- 5 000 responses received at each consultation stage
- 50 sites taken through detailed assessment
- Consultation = minimum expected requirements

*Table 5.2* indicates the costs that would be incurred on the basis that all the staff resources indicated in *Table 5.1* are provided by external consultant support. This assumes that consultants will play a significant role in JWDPD preparation. A range has been provided to reflect variations of consultant grade, cost and team structure between different consultancies. The table does not account for inflation rises in assumed day rates; neither does it include any assumed expenses.

**Table 5.2** *Estimated consultancy time and costs for production of JWDPD*

Consultancy Grade	Range A		Range B		Assumed range of day rates (£)	Estimated range of cost (£)
	%of days	Estimated number of days	%of days	Estimated number of days		
Principal	20	234.2	10	117.1	650 to 750	87 825.00 to 152 230.00
Senior	50	585.5	40	468.4	450 to 550	257 620.00 to 263 475.00
Junior	30	351.3	50	585.5	350 to 450	122 955.00 to 263 475.00
Total		1171		1171		538 660.00 to 608 920.00

Neither *Table 5.1* nor *Table 5.2* include any estimate for attending meetings of the Joint Committee or JWDPD Steering Group. These costs are indicated in *Table 5.3*.

**Table 5.3** *Estimated costs for attendance at meetings*

Consultancy Grade	Assumed range of day rates (£)	Joint Committee (assumed 21 meetings excluding training day)	Steering Group (assumed 42 meetings)
Principal	650 to 750	6,825 to 7,875	13650 to 15,750
Senior	450 to 550	4,725 to 5,775	9450 to 11,550

Assumed meetings are split evenly between Principal and Senior consultant

## 5.2 *OTHER EXPENSES*

There are a number of additional expenses that will need to be borne in mind in budgeting for production of the JWDPD.

### 5.2.1 *Joint Committee*

Costs associated with the Joint Committee will be dependent on how it is established. However, they might be considered to include: expenses for the Committee; venue hire; post of committee clerk; and administration costs.

### 5.2.2 *Consultation, publicity and printing*

These costs are dependent upon the consultation strategy prepared.

However, the particular circumstance of the JWDPD is that it will be adopted across 10 local authorities. The Town and Country Planning (Local Development) (England) Regulations 2004 require consultation at key stages of the JWDPD preparation process to be advertised in relevant newspapers. On the assumption that each district authority is served by a separate

newspaper, this factor alone may contribute in the region of £20,000 at each relevant stage.

Having reference to the work completed for the North London planning authorities, the publicity and printing costs presented at Appendix B of report to AGMA Chief Executives (£50,000) appears to be reasonable.

### 5.2.3 *Independent Examination*

The Planning Inspectorate Service is shortly due to produce consultation draft material for estimating examination timetables and costs. The Independent Examination of the JWDPD is expected to sit for approximately 40 days; as such the estimates provided in the work completed for the North London planning authorities provides a useful reference. However, this does not include costs associated with venue hire etc. The estimated costs for the examination presented at Appendix B of report to AGMA Chief Executives (£200,000) appears to be reasonable. However, this figure is likely to need to be increased to include a significant proportion of consultancy support.

### 5.3 *JWDPD ESTIMATED STAFF RESOURCE REQUIREMENTS AND SUMMARY OF SCHEDULE*

A preparation timetable for the JWDPD has been developed using a common computer package. *Table 5.4* over the page, identifies each of the tasks presented in *Section 3* and indicates the expected schedule of work. *Table 5.4* also indicates the level of staff resources that would be required for each task.

A gantt chart has been produced that shows the scheduling of all tasks.

**Table 5.4** *Indicative consultancy resources required for each task and scheduling of tasks*

Number	Task Description	Number of staff days	Schedule	Joint Committee
PRELIMINARY TASKS			2006	
1	Prepare report to AGMA Chief Executives.	2	By March 06	
2	Prepare a JWDPD consultation strategy to be integral to each authority's SCI.	20		
3	a) Prepare the local agreement and gain agreement from all authorities.	10	Concurrently throughout Winter 2005/ Spring 2006	Joint Committee training day 14 July 2006
	b) Establish Joint Committee and hold training day.	3		
	c) Establish JWDPD Steering Group with MOU as required.	5		
4	a) Commitment from each authority to delay submission of LDS or update at earliest opportunity.	5		
	b) Prepare appropriate details of JWDPD within a timescale to enable inclusion into the revised LDS.	10		
	c) Recognition that delay incurred by one authority's Full Council in regard the JWDPD is beyond the control of the other authorities.	2		
	d) Discuss production timetable with GONW and PINS prior to inclusion in LDS.	3		
5	a) Establish line of communication with Policy Officer at AGMA to ensure consistency within and between core strategies and other DPD.	1	Throughout production of JWDPD	
	b) Ensure effective dialogue between GMGU and all authorities through Joint Committee and JWDPD Steering Group.	42		
	c) Ensure policies developed are in general conformity with national and regional policy through regular dialogue with GONW, NWRA and WDA, including representation on JWDPD Steering Group.	42		
6	Prepare scope of policies document for waste related strategic policy.	25	Concurrently throughout Winter 2005/ Spring 2006	
7	Establish annual monitoring framework for JWDPD production.	2		
8	Establish SLA with Planning Inspectorate.	5		
9	Establish name of JWDPD.	5		
PRELIMINARY TASKS to be completed by April 2006.				
JWDPD PREPARATION TASKS			YEAR 0	2006

Number	Task Description	Number of staff days	Schedule	Joint Committee
pre production/ evidence gathering				
Supp. Task	Make contact with appropriate groups and stakeholders in order to inform them of the JWDPD and find out how they would like to participate in its production.	50	April to July 06	
1	Review existing plans, policies and strategies.	25	March to May 2006	
2	a) Understand waste arisings and forecast waste growth.	10	January to May 2006	
	b) Understand current waste management capacity.	30		
	c) Undertake need assessment.	30		6 June 2006
3	Review, and update as necessary, objectives for the JWDPD.	5	By July 2006	
4	Ensure community strategies and MWMS inform preparation of the JWDPD.	10	Throughout	
5	a) Prepare the SA scoping report.	30	March to June 06	14 July 2006
	b) Consult on Scoping Report and address comments received.	10	Sept/October 06	8 September 2006
6	Draft a spatial vision and define spatial objectives.	5	October 2006	
Supp. Task	Prepare a factsheet containing essential pieces of information in regard the JWDPD. Responses could be invited to the document, although it need not be a formal consultation.	5	July to September 2006	13 October 2006
production tasks				
1	a) Engage with community to identify issues and options.	25	Oct/Nov 2006	8 December 2006
	b) Prepare issues and options and undertake SA	145	October 06 to March 2007	9 February 2007
	c) Engage with community in accordance with consultation strategy (Regulation 25).	50	March/ Apr 07	
			YEAR 1	
2	a) Record responses on database.	2	As required	
	b) Address responses and audit how they have been used to inform JWDPD production.	1 per 500 comments	March to May 2007	13 April 2007



Number	Task Description	Number of staff days	Schedule	Joint Committee
Supp. Task	Effective dialogue with communities also involves feeding comments back. Prepare report outlining comments received and how they have informed production of the JWDPD.	10	March to May 2007	
3	a) Undertake detailed site appraisal, develop development control policies and work toward preferred options.	15 days plus 3 days per site	May to August 2007	8 June 2007
	b) Subject options to sustainability appraisal.	20	July / August 07	14 Sept 07
	c) Prepare preferred options document and SA report.	15	Aug/ Sept 07	9 Nov 2007
	d) Consult formally on preferred options document and SA report (Regulation 26).	10	January/Feb 08	11 Jan 2008
	e) Submit preferred options document and SA report to each Full Council.	12	January to April 2008	14 Mar 2008
Supp. Task	Include monitoring proposals in the preferred options document.	10	August/Sept 07	
4	a) Establish database of respondents and comments made.	5	January/ Feb 08	
	b) Address responses made to preferred options document.	1 per 500 comments	Jan to March 2008	
	c) Use responses and SA to produce submission document.	25	Jan to April 08	
			Year 2	
Supp. Task	Effective dialogue with communities also involves feeding comments back. Prepare report outlining comments received and how they have informed production of the JWDPD.	10	April/ May 2008	9 May 2008
5	a) Sustainability Appraisal.	10	a to e) January to April 2008	
	b) Draft policies.	20		
	c) Production of the submission document, including monitoring proposals and map.	30		
	d) Ensuring each district authority's proposals map is amended as appropriate.			
	e) Preparation of statement of compliance with SCI.	10		13 June 08
	f) Approval by each authority's Full Council.	5	f) June to September 2008	12 Sept 08
		20		

Number	Task Description	Number of staff days	Schedule	Joint Committee
6	a) Submit document and SA report. (Regulation 28)	10	Oct/ Nov 08	17 October 2008
	b) Statutory consultation. (Regulation 29)	10	October to December 2008	
	c) Representations on submitted JWDPD. (Regulation 31)	1 per 500 comments	December / January 2009	12 Dec 2008
examination and adoption				
1	a) Examination preparation.	40	a) February to June 2009	13 February 2009
	b) Pre - examination meeting.	5	b) March 2009	
YEAR 3				
Supp. Task	Prepare a factsheet outlining the process that has occurred and key decisions made in the plan making process. Disseminate the factsheet widely throughout the Greater Manchester authorities.	10	March to May 2009	10 April 2009
2	a) Independent Examination.	45	a) June/July 09	12 June 09
				14 Aug 09
				9 Oct 09
	b) Binding Report & making subsequent changes to JWDPD.	20	b) February to April 2010	11 Dec 09
				12 Feb 2010
				9 April 2010
YEAR 4				
	ADOPTION by each district authority's Full Council.	20	April to June 2010	11 June 2010
Implementation, Monitoring and Review			July	2010
				13 Aug 2010

ID	Task Name	Start	Finish	2006												2007											
				Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	
1	<b>PRELIMINARY TASKS</b>	Mon 02/01/06	Fri 31/03/06																								
2	1. Prepare report to AGMA Chief Executive	Mon 02/01/06	Fri 31/03/06																								
3	2. Prepare a JWDPD consultation strategy to be integral to each authority's S	Mon 02/01/06	Fri 31/03/06																								
4	3 a) Prepare the local agreement and gain agreement from all districts.	Mon 02/01/06	Fri 31/03/06																								
5	3 b) Establish Joint Committee and hold training day.	Mon 02/01/06	Fri 31/03/06																								
6	3 c) Establish JWDPD Steering Group with MOU as required.	Mon 02/01/06	Fri 31/03/06																								
7	4 a) Commitment from each authority to delay submission of LDS or update at	Mon 02/01/06	Fri 31/03/06																								
8	4 b) Prepare appropriate details of JWDPD within a timescale to enable inclusi	Mon 02/01/06	Fri 31/03/06																								
9	4 c) Recognition that delay incurred by one authority's Full Council in regard th	Mon 02/01/06	Fri 31/03/06																								
10	4 d) Discuss production timetable with GONW and PINS prior to inclusion in LI	Mon 02/01/06	Fri 31/03/06																								
11	5 a) Establish line of communication with Policy Officer at AGMA to ensure coi	Mon 02/01/06	Fri 31/03/06																								
12	5 b) Ensure effective dialogue between GMGU and all authorities through Join	Mon 02/01/06	Fri 31/03/06																								
13	5 c) Ensure policies developed are in general conformity with national and regi	Mon 02/01/06	Fri 31/03/06																								
14	6 Prepare scope of policies document for waste related strategic policy.	Wed 01/02/06	Fri 31/03/06																								
15	7 Establish annual monitoring framework for JWDPD production.	Mon 02/01/06	Fri 31/03/06																								
16	8 Establish SLA with Planning Inspectorate.	Mon 02/01/06	Fri 31/03/06																								
17	9 Establish name of JWDPD.	Mon 02/01/06	Fri 31/03/06																								
18	<b>JWDPD PREPARATION TASKS</b>	Mon 02/01/06	Tue 24/10/06																								
19	<b>pre production/ evidence gathering</b>	Mon 02/01/06	Tue 24/10/06																								
20	<i>Supplemental Task: Make contact with appropriate groups and stakehol</i>	Mon 01/05/06	Mon 31/07/06																								
21	1 Review existing plans, policies and strategies.	Mon 03/04/06	Wed 31/05/06																								
22	2 a) Understand waste arisings and forecast waste growth.	Mon 02/01/06	Wed 31/05/06																								
23	2 b) Understand current waste management capacity.	Mon 02/01/06	Wed 31/05/06																								
24	2 c) Undertake need assessment.	Mon 02/01/06	Fri 30/06/06																								
25	3 Review, and update as necessary, objectives for the JWDPD.	Mon 02/01/06	Fri 30/06/06																								
26	<b>4 Ensure community strategies and MWMS inform preparation of th</b>	Wed 01/03/06	Fri 16/06/06																								
27	5 a) Prepare the SA scoping report.	Wed 01/03/06	Wed 31/05/06																								
28	Joint Committee Meeting	Fri 16/06/06	Fri 16/06/06																								
29	Joint Committee Meeting	Fri 14/07/06	Fri 14/07/06																								
30	5 b) Consult on Scoping Report and address comments received.	Mon 04/09/06	Mon 09/10/06																								
31	6) Draft a spatial vision and define spatial objectives	Tue 03/10/06	Tue 24/10/06																								
32	<i>Supplemental Task: Prepare a factsheet containing essential pieces of information in regard the JWDPD.</i>	Mon 03/07/06	Fri 29/09/06																								
33	Joint Committee Meeting	Fri 08/09/06	Fri 08/09/06																								
34	Joint Committee Meeting	Fri 13/10/06	Fri 13/10/06																								
35	<b>PRODUCTION TASKS</b>	Mon 02/10/06	Fri 30/01/09																								
36	1 a) Engage with community to identify issues and options	Mon 02/10/06	Fri 10/11/06																								
37	1 b) Prepare issues and options and undertake SA	Tue 03/10/06	Fri 30/03/07																								
38	Joint Committee Meeting	Fri 08/12/06	Fri 08/12/06																								
39	Joint Committee Meeting	Fri 09/02/07	Fri 09/02/07																								
40	1 c) Engage with community in accordance with consultation strategy (Regulat	Fri 02/03/07	Fri 13/04/07																								
41	2 a) Record responses on database.	Fri 02/03/07	Fri 20/04/07																								
42	2 b) Address responses and audit how they have been used to inform JWDPD	Fri 23/03/07	Fri 11/05/07																								
43	<i>Supplemental Task: Prepare report outlining comments received and how they have informed production of the JWDPD.</i>	Fri 23/03/07	Fri 11/05/07																								
44	Joint Committee Meeting	Fri 13/04/07	Fri 13/04/07																								
45	Joint Committee Meeting	Fri 08/06/07	Fri 08/06/07																								
46	3 a) Undertake detailed site appraisal, develop development control policies at	Mon 14/05/07	Mon 06/08/07																								
47	3 b) Subject options to sustainability appraisal.	Mon 02/07/07	Fri 10/08/07																								
48	3 c) Prepare preferred options document and SA report.	Mon 13/08/07	Fri 14/09/07																								

Project: Project 6 Dec 2005  
Date: Thu 15/06/06

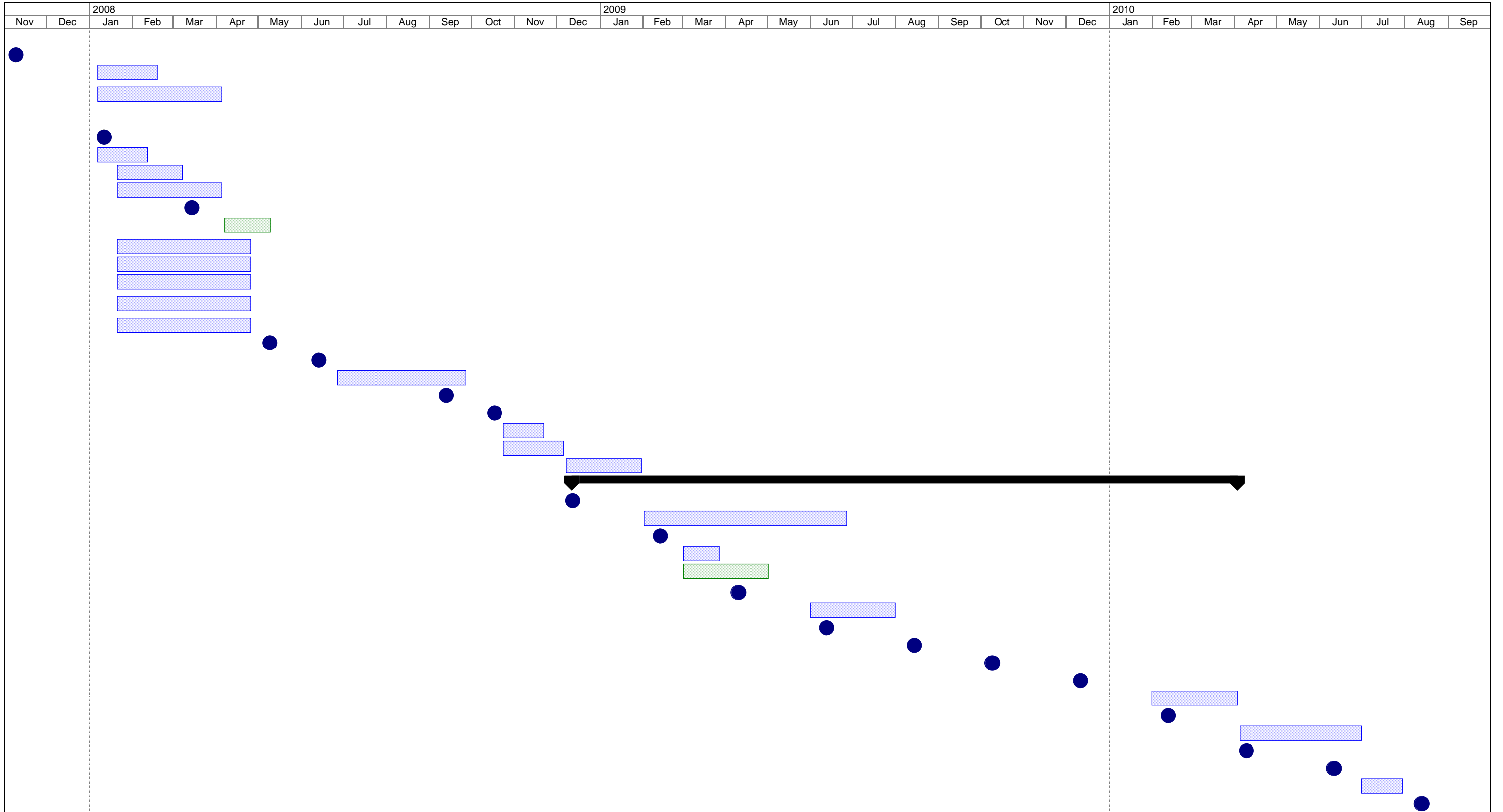
Task Progress Summary External Tasks Deadline   
Split Milestone Project Summary External Milestone



2008		2009												2010																				
Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep

Project: Project 6 Dec 2005  
Date: Thu 15/06/06

Task		Progress		Summary		External Tasks		Deadline	
Split		Milestone		Project Summary		External Milestone			



Project: Project 6 Dec 2005  
Date: Thu 15/06/06

Task  
Split



Progress  
Milestone



Summary  
Project Summary



External Tasks  
External Milestone



Deadline

Annex A

## Example of database of responses

**Table 1.1** Issues Paper 3 Draft policies - Paper 3 Q3. What modifications, if any would you like to see in policy 1?

<b>Issues Paper 3 - Draft Policies. Question 3</b>			
<b>User ID</b>	<b>Comments</b>	<b>ERM Response</b>	<b>Supp. Text/ Policy Changes/ additional items to check</b>
2382	<p>Add in</p> <p>(iii)there i sno damage to the surrounding area and communities</p> <p>(iv) appropriate infrastructure is put in place to ensure that consequential traffic generation is kept off local roads</p>	DC policy issues	<p>POLICY 1 Landfill re-ordered.</p> <p>NOTED: the policy only expects development at the preferred sites or locations – it does not deal with proposals submitted for landfill development elsewhere. This may be acceptable as landfilling is at the bottom of the hierarchy so should be the most restrictive policy – an applicant can still apply for landfill elsewhere but would have to provide justification for permission contrary to policy.</p> <p><b>Policy 13: Landfilling and landraising</b></p> <p>The County Council will only grant planning permission for waste disposal by landfilling and landraising provided:</p> <ol style="list-style-type: none"> <li>1. the waste to be disposed of cannot practically and reasonably be re-used, recycled or processed ( to recover materials; produce compost, soil conditioner, inert residues or to recover energy); and</li> <li>2. the proposed development is both essential for and involves the minimum quantity of waste necessary for: <ul style="list-style-type: none"> <li>• the purposes of restoring current or former mineral working sites; or</li> </ul> </li> </ol>



Issues Paper 3 - Draft Policies. Question 3

User ID	Comments	ERM Response	Supp. Text/ Policy Changes/ additional items to check
2063	<p>ISSUE PAPER 3 LANDFILL</p> <p>We note that we represent a stakeholder interest in the potential use of the Moorhouse Sandpits for waste management purposes including, possibly, landfill using inert waste materials.</p> <p>We note also that the findings of the County are that: "The shortfall in the availability of inert landfill is predicted to start after about 2007 in each of the three scenarios. This is due to the various commercial factors that influence the annual acceptance volume of each landfill and the need to complete sites within acceptable lifespans. The potential new inert landfill capacity that might be required is between 4.7 and 5.5 million m3 of voidspace up to 2020.</p> <p>We therefore consider that the County Council</p>	<p>NOTED</p> <p>[copied into sites comments sheet]</p>	<ul style="list-style-type: none"> <li>• facilitating a substantial improvement in the quality of land; or</li> <li>• facilitating the establishment of an appropriate afteruse; or</li> <li>• improving land damaged or degraded as a result of existing uses and where no other satisfactory means exists to secure the necessary improvement; and</li> </ul> <p>3. the proposed development is at one of the following preferred sites or preferred areas:</p> <p style="padding-left: 40px;">.....</p> <p style="padding-left: 40px;">.....</p> <p>subject to the development meeting the criteria set out.....</p> <p>Preparatory work indicates there may not be any preferred sites so that subsection may yet be removed.</p>

**Issues Paper 3 - Draft Policies. Question 3**

User ID	Comments	ERM Response	Supp. Text/ Policy Changes/ additional items to check
	should identify Moorhouse Sandpits as potentially satisfying part of its total resource requirements.		
2044	Re 1.4, part ii): This could lead to imaginative interpretation of this policy and therefore needs to be worded more precisely.	Disagree with comment, the policy includes the word minimum which is a quantifiable amount relevant to each situation.	
2281	In the absence of any potential sites being identified it is difficult to determine whether any locations will fulfil the requirements of this policy. This matter needs to be addressed at the draft plan stage.	NOTED	
2030	Policy 1 is far too restrictive by referring to waste in general and to waste that cannot be otherwise processed. Landfilling stable, non-reactive material in old workings can be a good environmental option and is very different from putting unsorted, mixed and putrefying rubbish into landfill, as has been done for so long. Requirements are changing - waste progressively will need to be segregated - SCC should wake up to this! As presently drafted Policy 1 appears to be merely a buttress to support mass burn incineration - which will be unpopular and ultimately uneconomic.	Disagree - policy refers to reused, recycled or processed - applicable to all technologies and supportive of Waste Hierarchy.	Supp Text Need to make sure landfill is last resort, otherwise policy is not consistent with WS2000 and waste hierarchy
2029	More emphasis on local interaction in the planning process and the opportunity to ensure commercial waste management organisations are more transparent and less evasive in their approach to public study.	NOTED	
2363	When you build an incinerator in your community, you are advertising to the world that you are not clever enough, either politically or technically, to recover your discarded resources in a manner which is responsible to your community or future generations. Dr. Paul Connett 4th Annual International Management Conference Waste-To-Energy, Amsterdam. 24-25 November 1998	NOTED	

**Issues Paper 3 - Draft Policies. Question 3**

User ID	Comments	ERM Response	Supp. Text/ Policy Changes/ additional items to check
2279	<p>Part I of this draft policy needs to include the word economically as in “practically, economically and reasonably be reused”, to ensure consistency with the proximity principle.</p> <p>Part ii of this draft policy requires "the use of the minimum amount of waste needed to". This could be considered to be inconsistent with the best and most practicable use of an appropriate landfill site.</p> <p>The policy should be modified to recognise that the minimum requirement to restore a former mineral working, and the most practicable utilisation of an appropriate site for landfilling to meet the residual disposal needs of Surrey are two different things. This policy as currently worded could lead to an increased number of landfills required to meet the residual disposal needs of the Plan period.</p> <p>This section of the draft policy is also inconsistent with the statement on “Husbanding of landfill capacity may therefore be prudent” as it limits the operator to be able to make best use of void.</p>	<p>‘Economic’ not part of proximity principle, but anyway can be included in discussion of ‘practicably’.</p> <p>Understand concern – issue to be picked up in Supp Text</p>	<p>Supp Text Policy should require minimum amount and leave the applicant free to justify otherwise in their application. In general final restored levels should respond to surrounding land levels.</p>
1155	<p>1. Any recovery of energy must be qualified. It must always be CHP.</p>	<p>Energy recovery is included in the policy – to require CHP is too specific</p>	
1135	<p>Delete (i) because:- (ii) has higher priority than (i) “practicably and reasonably” is uncertain in meaning Carried out in appropriate locations, and providing the land filling is coupled with landfill gas recovery, it is probably among the most environmentally friendly means of waste disposal. Appropriate locations would be remote from habitation and probably have impermeable subsoil so they are unlikely to be found in Surrey. Industrial composting is probably the least environmentally friendly of all methods of waste disposal because it makes the greatest contribution to the greenhouse effect by releasing the carbon dioxide</p>	<p>Disagree (i) is a fundamental policy requirement (ii) is a landscape matter ‘practicably and reasonably’ are both terms used throughout planning –have the test of reasonableness within planning and practicably is used throughout BPEO.</p> <p>This may be so, but policy is drafted in compliance with and to reflect waste hierarchy and national strategy requirements.</p>	

Annex B

## Example summary of responses tables

**Table B1 Issues and options relating to the waste hierarchy**

<b>Community Engagement Responses</b>	<b>How to implement through core strategy</b>
Minimisation of product packaging	Packaging is largely beyond the scope of the core strategy. National legislation applies to manufacturers and supermarkets.
Waste minimisation is difficult to implement and to measure the effects	Whilst this comment is accepted, this does not diminish need to implement waste hierarchy through core strategy policy. National and regional promotion of waste hierarchy should be complied with.
Encourage reuse and recycling of demolition and construction waste	Use of secondary aggregate also a national, regional & structure plan goal. This should be included in the core strategy.
Incentive, or encouragement for both the public and manufacturers to minimise waste, and increase its reuse and recycling	Policy can encourage minimisation of waste but core strategy unable to require actions of public or manufacturers.
Dovetailing with other social strategies could be a way for the core strategy to address waste minimisation	Core strategy has a wider remit, including a responsibility to implement other strategies/programmes of the County Council, such as the Community Strategy.
Waste recycling should be a key objective and waste minimisation an utmost priority	Core strategy should include policy dedicated to move waste up hierarchy, with a focus on minimisation and recycling.
Enforcement of minimisation strategies	This is largely beyond the remit of core strategy as the responsibility lies with the waste collection authorities. However, core strategy should include a commitment to the waste hierarchy and include a focus on waste minimisation.
Education and awareness raising of both the general public and waste industry professionals	Core strategy should seek implementation of programmes such as those set out in Joint Municipal Waste Management Strategy & Community Strategy.

<b>Community Engagement Responses</b>	<b>How to implement through core strategy</b>
Core strategy should be directional tool toward more sustainable practices	A new purpose of the core strategy is to include spatial policy to implement other strategies such as the Community Strategy. It has a role to play beyond just land use concerns. Core strategy also required to be, and is being, developed alongside SA. Reiteration and integration of SA means sustainable development objectives can be incorporated in policy and core strategy objectives.
Developers should be required to contribute to waste minimisation during the construction of new developments, and to incorporate recycling facilities in new developments	Also a policy issue for RPG 11 (policy WD3). The core strategy should pick up on these issues.
Local councils should lead by example through adopting in-house waste minimisation policies, for example through their purchase of services	Core strategy should pick up on green procurement principles such as those set out in Joint Municipal Waste Management Strategy.
Objection to wasteful private finance initiatives which rebuild rather than reuse buildings	Consideration of PFI is beyond the remit of the core strategy. Through policy and objectives the core strategy can encourage sustainable waste management in demolition and construction projects.
Concern for increased number of fly-tipping incidents due to higher disposal costs	Moving waste up the hierarchy may well result in higher costs. Enforcement of fly tipping is a matter for the Environment Agency and WCA, but the core strategy can play a part through education on waste issues and enabling appropriate development.