

Greater Manchester Joint Waste Development Plan Document

Strategy

Final Report

June 2006

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Greater Manchester Geological Unit

Greater Manchester Joint Waste Development Plan Document: *Strategy*

June 2006

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1 *GREATER MANCHESTER JOINT WASTE DEVELOPMENT PLAN DOCUMENT: STRATEGY*

1.1 *INTRODUCTION*

The ten districts constituting the Association of Greater Manchester Authorities (AGMA)⁽¹⁾ have agreed to produce a Joint Waste Development Plan Document (JWDPD). This should be a modern, intelligent, and flexible document that provides a sound and sustainable basis for the provision of waste management infrastructure. It must recognise the circumstances, needs and aspirations of all the authorities within the Greater Manchester area.

Development of the JWDPD will be managed by a dedicated team located within the Greater Manchester Geological Unit (GMGU). This strategy has been prepared to be a reference document for the team. It is necessary that effective and efficient preparation of the JWDPD commences as soon as possible.

The strategy establishes the overall aims and objectives of the JWDPD, providing guidance and recommendations for its production. It makes reference to the context within which the JWDPD is to be produced, including national and regional policy requirements; the plan preparation arrangements of each of the ten authorities; and the existence of two waste disposal authorities and recognition of their municipal waste management strategies. It also identifies the risks to production of the JWDPD and how these can be managed so as not to delay its successful delivery.

A detailed project plan and timetable have also been produced, indicating resource requirements and scheduling of each task to ensure JWDPD production in a timely manner. Neither the agreed strategy nor project plan should be considered static documents. Instead, they should be flexible, in both their content and implementation, to accommodate change in circumstance or requirement.

1.2 *ENABLING MORE THAN JUST A JOINT WASTE DEVELOPMENT PLAN DOCUMENT*

Historically, waste management has been seen as a dirty business, to be kept separate from other land use concerns such as housing, retail or office development. Yet, it is an issue integral to all other land uses, throughout their development, operation and deconstruction.

PPS 10 sets out a national policy framework to enable sustainable waste management and to break the link between economic growth and the environmental impact of waste. Moving the management of waste up the

(1) Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan.

waste hierarchy is the critical method for achieving this aim. To genuinely engage with the waste hierarchy will require all authorities to incorporate reduction, reuse, and recycling initiatives, which can be achieved through non waste development, into their local development frameworks and development control decisions. For example, both Cherwell and South Oxfordshire District Councils require waste management facilities to be included in housing developments over a set threshold.

The JWDPD need not be seen simply as the means by which to deliver the necessary facilities. It is also able to affect issues broader than land use regulation, including, the good management of resources and influencing others in their specifications and purchasing. Well developed policy dealing with key principles would deliver this approach: non land use specific issues, such as minimisation, can be given a policy framework; other planning decisions, such as incorporating waste management initiatives within regeneration projects, can be influenced; and all stakeholders and members of each community can be inherently involved - both affecting the policy as drafted and strengthening their appreciation of integrated and sustainable waste management.

1.3

AIMS AND OBJECTIVES

The overarching aim of this strategy and the project plan is to ensure that an effective planning framework is in place to deal with future demands of the waste management industry and to help reduce the risks to Greater Manchester's and Wigan Metropolitan Borough's municipal waste management strategies (MWMS).

This can be broken down into short, medium and long term objectives that 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 regional spatial strategy; and
- to be visionary, looking to sustainable development in the longer term.

Box 1.1 outlines the key purposes of the strategy and project plan.

Box 1.1

Purposes of the strategy and project plan

-
- to minimise the life cycle financial costs of the plan making process to the AGMA
 - to ensure compliance with national requirements – Waste Strategy 2000, PPS 10, LATS etc
 - to enable an efficient and effective plan preparation process
 - to deliver an innovative and robust framework that will ensure delivery of the plan for the AGMA
 - to enable effective implementation of the JWDPD bearing in mind barriers
 - to enable synchronisation with municipal waste management strategies and the Greater Manchester Waste Disposal Authority’s procurement process
 - to ensure consistency & conformity throughout – especially with regard to the local development scheme, statement of community involvement and core strategy
 - to provide reliable and credible documents to be used throughout plan making processes and at Examination in Public
 - to provide an assessment of key risks and provide guidance on how best to manage those risks
 - to deliver an effective tool for the plan development process through an appropriate level of preparation and identification of a critical path
-

1.4

FORMAT OF THE STRATEGY

The remainder of the strategy has been split into the following sections:

- Section 2* Context of the Joint Waste Development Plan Document
- Section 3* Risks to effective strategy implementation
- Section 4* Guidance and recommendations on key preliminary tasks
- Section 5* Guidance and recommendations on key stages of plan preparation

2.1 OVERVIEW

The drive to divert biodegradable municipal waste away from landfill, avoiding the payment of fines, achieving compliance with LATS (landfill allowance trading scheme) and procuring value for money municipal waste management services are key objectives underpinning modern waste management plans and strategies. Whilst the importance of achieving national and regional waste management targets for municipal waste is not dismissed, the JWDPD must also provide a policy framework for other waste streams, including: construction and demolition (C&D) waste; commercial and industrial (C&I) waste; and hazardous waste. This is especially appropriate within the current spirit of PPS 10, which seeks to achieve greater integration of waste management with other spatial planning issues.

2.2 NATIONAL DOCUMENTS

National planning policy for sustainable waste management is established in **Planning Policy Statement 10: Sustainable Waste Management** (PPS 10). The Office of the Deputy Prime Minister is committed to the planning process being successful in delivery of the required waste management infrastructure.

Positive planning has an important role to play in delivering sustainable waste management:

- *through the development of appropriate strategies for growth, regeneration and the prudent use of resources; and*
- *by providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time. ⁽¹⁾*

Tests that have been found to be burdensome, such as the proximity principle and assessment of best practicable environmental option (BPEO) have been removed from the planning process. Similarly, the issue of need has been moved to be a key responsibility for regional planning bodies in producing the regional spatial strategy; although clearly each planning authority or sub-regional area will need to understand how this relates to local circumstances.

A greater focus is now placed upon the waste hierarchy to provide the framework for establishing the necessary waste management infrastructure; addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for.

(1) Planning Policy Statement 10: Sustainable Waste Management. Page 5, paragraph 2. ODPM. 2005.

Public participation is placed at the heart of waste planning; encouraging communities to take responsibility for the waste they generate, whilst producing local development documents that: reflect the concerns and interests of communities; the needs of waste collection authorities, waste disposal authorities and business; and encourage competitiveness.

Waste Strategy 2000 has also been recently amended, reinforcing the importance of the waste hierarchy and removing the need to undertake BPEO assessment. Further, a quinquennial review of Waste Strategy 2000 is expected in 2006. There is a clear commitment from both Defra and ODPM for the municipal waste management strategies and planning documents to inform and be informed by each other, providing a clear framework for the waste management industry and other key stakeholders.

The **Waste & Emissions Trading Act 2003** (WET Act) sets landfill allowance targets for biodegradable municipal waste being sent to landfill by all disposal authorities each year. Biodegradable municipal waste disposed of to landfill over the allowance target (termed 'excess landfill') will incur a penalty, currently set at £150 per tonne. The WET Act also provides the legislative framework for the **Landfill Allowance Trading Scheme** (LATS) allowing waste disposal authorities to trade their landfill allowances to other authorities, save them for use in future years, or use them in advance. It has been established in order to enable waste disposal authorities to meet their obligations under the WET Act in the most cost effective way.

2.3

REGIONAL PLANNING DOCUMENTS

The Regional Waste Strategy for the North West (RWS) was adopted in September 2004. It was part of the Partial Review of Regional Planning Guidance for the North West. This Partial Review has since been withdrawn, although its content and deliberations have been carried through into the production of a draft regional spatial strategy (RSS). The North West Plan, Interim Draft Revisions to the Regional Spatial Strategy for the North West of England was published in October 2005 and is nearing the end of its six-week consultation period.

The review is timely as some of the underlying principles of the RWS have been superseded by the adoption of PPS 10. The emerging RSS for the North West will be a key driver of the JWDPD, as it is now a statutory document included within the development plan and commands conformity.

A purpose of the RSS is to apportion the tonnage of municipal and C&I wastes required to be managed by each waste planning authority within the Region. 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 emerging RWS should comprise a distribution of waste

tonnage requiring management and a pattern of waste management facilities of national, regional or sub-regional significance.

The emerging RSS identifies the key drivers seeking to reduce the reliance on landfill and promotes its replacement by alternative reprocessing, treatment and disposal facilities, referring to the RWS for 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. In general, the emerging RSS contains few policies on waste and provides little clarification in terms of regional apportionment and the distribution of waste management facilities. Instead, credible work undertaken in production of the JWDPD can be used to inform this pattern when it is developed.

PPS 10 expects the adopted RSS to be carried forward into local development documents. Consequently, in preparing the JWDPD, there should not be a need to reopen consideration of either the principles of the policy or the annual rates of waste to be managed. However, there will remain a debate on where those wastes should be managed.

2.4 WASTE DISPOSAL AUTHORITIES

2.4.1 *Municipal Waste Management Strategies*

There are two waste disposal authorities (WDA) relevant to preparation of the JWDPD: Wigan Metropolitan Borough Council; and the Greater Manchester Waste Disposal Authority, comprising the other nine authorities represented within AGMA.

Wigan Metropolitan Borough Council (WMBC) produced a MWMS in August 2003. This focussed on short term measures, prioritising the provision of a recycling infrastructure within the Borough. No consultation was undertaken in developing this MWMS. In 2004, the Borough gained funding from Defra to consider a future waste strategy for Wigan. Two workshops were held, with local politicians and voluntary groups, in considering a range of options to underpin this strategy. A report of the conclusions drawn was taken to Cabinet in August 2005, with the Borough now looking to produce a revised MWMS for consultation in April 2006.

The Greater Manchester Waste Disposal Authority (GMWDA) adopted its MWMS in May 2004. The strategy is designed to meet all known and anticipated duties of the authorities and is based on the aim of managing Greater Manchester's waste through infrastructure high in the waste management hierarchy. Recycling and composting targets set in the MWMS exceed current statutory requirements and national performance targets. Consultation was undertaken on draft editions of the MWMS.

2.4.2 *Service Procurement*

The two WDAs are looking to provide the required waste management services through very different routes. WMBC has an existing contract with Waste Recycling Group Ltd until 2012, with an option to extend for a further 15 years. The GMWDA is currently looking to procure new municipal waste management services through a private finance initiative (PFI) contract.

2.5 *LOCAL DOCUMENTS*

The existence of ten, discrete, local planning authorities within the Greater Manchester area is, itself, an important element of the context within which the JWDPD will be produced.

A brief review of the local development scheme produced by each authority has been undertaken. This has identified overarching conclusions that contribute to understanding the local context for the JWDPD, including:

- Bury Metropolitan Borough Council is looking to produce significantly more local development documents than any of the other authorities;
- most of the core strategies are programmed to be adopted by 2008, with two scheduled for adoption in 2009, and Rochdale looking to adopt its core strategy in 2010;
- most statements of community involvement (SCI) are scheduled for production between 2005 and 2006, both Rochdale and Salford intend to start their SCI in 2006 with adoption dates of 2007 and 2008 respectively;
- several risks are common to all the LDS, including staff retention and turnover, political engagement and delay, soundness of plan/legal challenge, budget, capacity of the planning inspectorate service; and
- all LDS include reference to the JWDPD.

2.5.1 *Core Strategy*

The original project outline foresaw the JWDPD comprising development control policies and the identification of sites. As the JWDPD is not to include a core strategy, it will be important to ensure that the constituent authorities' core strategies are appropriate for waste management. At this transition period, this represents both an opportunity and a threat. The opportunity is presented in that core strategies being developed may be influenced to include matters for waste management. A threat is presented in that each of the authorities have different timetables for core strategy production, which may not result in the timely provision of a clear planning strategy for waste. Further, at this stage it is not clear how appropriate each core strategy will be to waste planning concerns.

This issue has been discussed with ODPM, GONW and all constituent authorities. It has been agreed that each district's core strategy should include strategic waste related policy. The JWDPD should build upon key principles for waste management development and provide site specific allocations in relevant policy.

2.6

GOVERNANCE ARRANGEMENTS FOR THE JWDPD

Two approaches to governance were originally considered: Approach A required consent from all districts at all stages; Approach B involved the creation of a Joint Committee within AGMA, into which each authority would divest its waste (and potentially mineral) plan making powers. A third approach has been adopted that builds on the strengths of the former proposals.

A Joint Committee should be established, with representation from each district and responsibility for production of the JWDPD. It would have an Executive function with Full Council approval from each district required only for submission and adoption drafts of the JWDPD. This approach provides most opportunity to ensure the JWDPD is recognised as an integral part of each authority's local development framework, whilst streamlining the decision making processes.

3.1

INTRODUCTION

Waste management is an issue that generates a great deal of interest and debate. Unfortunately, this has historically been used to intercept the provision of necessary and appropriate facilities. There are a number of potential barriers to the effective implementation of the JWDPD, which need to be managed so as to result in the least disruption. The key risks, many of which are shared by the constituent authorities, are considered to be:

- community engagement incorporating political and public participation and public perception;
- lack of specialised waste planning expertise;
- financial resources;
- need for synchronisation with MWMS and WDA infrastructure requirements;
- production timetable and policy requirements of the RSS;
- cohesion of the joint working arrangements;
- soundness of plan/legal challenge; and
- capacity of the Planning Inspectorate Service.

This section of the strategy discusses each of these risks and proposes generic headline actions for managing them, where relevant. *Section 4* provides more detailed recommendation on key preliminary tasks having regard to effective risk management.

3.2

COMMUNITY ENGAGEMENT

It will clearly take some time to change significantly public perception regarding waste management facilities. Whilst some attitudes can be affected through education and awareness raising initiatives, for the majority of the general public there will remain an inherent fear, and therefore distrust, of waste management facilities. Realistically, these feelings are most likely to be changed over time by well run facilities located in appropriate locations, effectively managing waste with few impacts on their surrounding environment – essentially waste facilities making a positive contribution to sustainable communities.

Engaging the public, political figures and other stakeholders early on in the plan making process is a keystone in laying the foundations for future change. Participation, by political and public stakeholders, has a very real role to play in informing the content and direction of the JWDPD and therefore ensuring

its ultimate credibility as a robust framework for the provision of waste management facilities. Community engagement can also directly tackle some of the hard set perceptions of waste management and make public some of the difficult decisions that have to be made. This includes integrating waste management facilities more fully with other development proposals and ensuring they are firmly embedded in consideration of other spatial planning concerns.

A post of communication officer could be set up within the GMGU team. The postholder would be responsible for producing the consultation strategy (discussed below) for organising events and for acting as a central point for all responses. However, as the role sits within the plan making team, it ensures that community involvement is inextricably interlinked with technical tasks. This would be an additional cost to the project, but is likely to be more cost-effective than externalising to private consultants.

Headline Actions

- Prepare a consultation strategy to be integrated within each district's SCI
- Establish waste champions within each authority at Member and officer level
- Consider post of communication officer within the GMGU team

3.3

THE LACK OF SPECIALISED WASTE PLANNING EXPERTISE

The lack of specialised waste planning expertise is a very real threat and one shared with many other waste planning authorities in the Country. Similarly, many of the Greater Manchester authorities identified staff turnover as a risk to the delivery of their other local development documents. However, it is also possibly the easiest of the identified barriers to be overcome.

The GMGU has recruited new staff to undertake work on the JWDPD. Currently, all but one of the identified posts have been filled, but not all the staff have a waste planning background. The team structure has been revised to allow greater flexibility between roles, but the JWDPD production timetable is tight and additional specialised waste planning expertise is likely to be required from consultancy support. Clearly, this has financial implications, but the certainty of delivering a robust and credible policy framework, on schedule, is an obvious benefit.

Headline Actions

- Identify tasks that will require specialist consultancy support and identify appropriate sources for that support
- Ensure all staff are aware of work being undertaken and how it fits into the overall programme of JWDPD production

3.4

FINANCIAL RESOURCES

Organisation early in the process of JWDPD production will greatly assist in the allocation of financial resources in terms of both local and strategic, and short and long term considerations. An example of a local and shorter term consideration is the planning delivery grant. In the longer term, and at a more strategic level, the JWDPD needs to provide a framework that can deliver the adopted MWMS and the infrastructure contracted by the two WDA. The costs incurred through the unnecessary delay or lack of delivery of these strategies will be substantial and have potential for significant impact throughout all of the authorities.

A preliminary budget has been prepared and was presented to the AGMA Chief Executives on 29 July 2005. It will be necessary to revise the budget estimate to take account of delays experienced so far in the process and to incorporate the resource requirements and their financial implications to be presented in the project plan. Nonetheless, having this budget estimate in place, indicating where and when the budget is allocated, and the likely level of contribution to be gained from each of the authorities, is a sound start to the management of financial resources.

Headline Actions

- Review financial, staffing and timetabling resources in accordance with the project plan

3.5

NEED FOR SYNCHRONISATION WITH MWMS AND WDA INFRASTRUCTURE REQUIREMENTS

Defra and ODPM expect the waste disposal and the waste planning functions of local authorities to co-operate in delivering a sustainable waste management infrastructure.

Preparation of a new MWMS or significant changes to an adopted strategy should now be accompanied by strategic environmental assessment (SEA) and a greater degree of public scrutiny. Increasingly, MWMS will be produced in a process more akin to the plan making process. The MWMS developed by the two WDA have not been developed subject to SEA. As such, there is a risk associated with wholly incorporating the MWMS as adopted. Instead, the underlying principles of each of the MWMS can be identified and incorporated into early community engagement initiatives. Furthermore, the MWMS can provide baseline data and so contribute to evidence gathering tasks. In this way, the adopted MWMS can usefully inform development of the JWDPD, whilst managing the risks that might arise from wholly incorporating them.

It is in all authorities' interest to avoid Public Inquiries over a facility sought by the WDA and refused by the relevant planning authority. To avoid this situation occurring, it is important to ensure that MWMS, contracts and waste planning frameworks have a shared purpose and direction. However, the JWDPD must deal with all wastes, not only municipal waste, which is also far from being the majority of waste generated. As such, the policy framework must not be discriminatory to the sustainable management of other waste streams.

Headline Actions

- Incorporate key objectives/principles from each of the MWMS in early community engagement initiatives
- Identify data for evidence gathering tasks eg quantity of municipal waste produced, arisings within each district, forecast growth, site search work
- Include representation from each WDA on Steering Group

3.6

PRODUCTION TIMETABLE AND POLICY REQUIREMENTS OF THE RSS

The RSS is not currently adopted; its development has been affected by commencement of the Planning and Compulsory Purchase Act 2004, and by publication of PPS 10. This is not a situation unique to Greater Manchester; it is experienced by many, if not all, waste planning authorities throughout the Country.

There are risks associated with the production timetable of the RSS in terms of:

- will the RSS be developed enough to provide the necessary framework within which to develop the JWDPD; and
- will the JWDPD be in a position to provide a credible response to proposed RSS policy as it is being developed?

Production of the JWDPD should not be delayed until adoption of the RSS. This would have consequential effects on the delivery of a sustainable waste management infrastructure, risking implementation of the MWMS and incurring significant penalty costs. The RSS must be produced in conformity with national policy, so its underlying principles should not be unfamiliar to, or pose significant barriers to, the JWDPD.

The greatest risk might be felt in policies dealing with waste management tonnage apportionment and the distribution of facilities throughout the Region. Yet, a sound evidence base gathered in preparation of the JWDPD will also provide a robust and credible basis from which to make representations to proposed apportionment and distribution policy in the RSS. Alternatively, it will provide a sound evidence base if this matter is unresolved in the adopted RSS.

Headline Actions

- Start evidence gathering and community engagement initiatives
- Continue to develop relationship with the regional planning body in order to keep informed

3.7 *COHESION OF THE JOINT WORKING ARRANGEMENTS*

3.7.1 *Joint Committee and Local Agreement*

A Joint Committee, with representation from each district, should be established that will be responsible for production of the JWDPD. This is possible under Section 101 (5) of the Local Government Act 1972. Full Council approval from each district would remain to be required to approve the submission and adoption drafts of the JWDPD. This approach provides most opportunity to ensure the JWDPD is recognised as an integral part of each authority's local development framework, whilst streamlining the decision making processes.

The Joint Committee must be underpinned by the necessary resources to ensure full contributions from all districts, including Member training and the commitment to meetings. Resources will also need to be made available for provision of meeting rooms, administration, access to a committee clerk etc. Clear and effective lines of communication will be essential to ensure that Full Councils are not surprised by the content of submission and adoption documents.

The timescale for producing the JWDPD is very tight. To ensure the Joint Committee is kept frequently updated on progress and that production is not delayed through waiting for a Joint Committee decision, meetings have been scheduled on a two month cycle. Many of the districts' Full Councils have a three month lead in time prior to the meeting date. To better facilitate JWDPD production this should not be incorporated into the working arrangements for the Joint Committee. Instead, a minimal lead in time for presentation of items should be required, but each Member of the committee should be provided with a copy of the project plan, so they are aware of expected progress and topics for discussion.

3.7.2 *Steering Group*

Production of the JWDPD should be overseen by a steering group, to comprise of senior officers from each district and include representation from the two WDA, GONW, AGMA and other relevant bodies as appropriate.

Resources will be required to ensure commitment from each district through:

- attendance at meetings of officers with a level of seniority to make decisions on behalf of their authority;

- identified replacement officers in the event that one cannot attend;
- taking information to Full Council so that it is kept informed throughout JWDPD production; and
- seeking to ensure that waste management is incorporated within other DPD, particularly the core strategy.

3.7.3 *Commitment from authorities shown in LDS and/or Local Agreement*

Commitment from each authority to the JWDPD production timetable should be clearly established. This can be achieved by a statement from each authority (either within the local agreement or each LDS, or both) that delay incurred by its own Full Council is beyond the control of the other authorities within Greater Manchester.

Headline Actions

- Prepare local agreement and establish Joint Committee. Take relevant Members through training and provide project plan
- Establish Steering Group, with memorandum of understanding as relevant
- Update all LDS with relevant details of JWDPD, including commitment from each district

3.8 *SOUNDNESS OF PLAN/LEGAL CHALLENGE*

A core strategy for waste should *set out a planning strategy for sustainable waste management which enables adequate provision of waste management facilities in appropriate locations.* ⁽¹⁾ The approach of producing a development plan document comprising of detailed development control policies and the identification of sites without having first progressed a sound planning strategy is considered to be at a high risk of legal challenge.

ODPM has advised that it is not possible to have two core strategies within one district. It will be necessary to ensure that each district's core strategy includes strategic policy based on the key planning objectives in PPS 10. The JWDPD should then focus on developing sustainable options for key principles to inform the identification of specific sites.

This approach should bring a number of additional benefits, including:

- engaging with all communities at a broader level;
- raising public awareness of waste management issues;
- extending the waste management debate beyond municipal waste;

(1) Planning Policy Statement 12: Local Development Frameworks. Page 8, paragraph 2.11(ii). ODPM. 2004.

- provision of a planning strategy and robust framework on which to underpin site allocations.

Headline Actions

- Ensure each district's core strategy contains policy relevant to waste management planning and based on the key planning objectives of PPS 10; this policy must be consistent across Greater Manchester
- Focus discussion on key and location principles to then inform site specific options

3.9

CAPACITY OF THE PLANNING INSPECTORATE SERVICE

The local development schemes for the ten authorities indicate that circa 2008 the Planning Inspectorate Service (PINS) will be dealing with: 7 core strategies; 2 housing development plan documents; 2 area action plans; and 4 other development plan documents from within Greater Manchester alone. The drive from central Government for local authorities to put in place the new planning system will have a significant impact on PINS in its ability to accommodate the independent examination and produce the inspector's report.

Production of the JWDPD should not be delayed due to uncertainty over the capacity of PINS. The capacity of PINS is a matter beyond the remit of any local authority. Instead, the production timetable should be developed and presented to PINS at an early stage to establish the service level agreement (SLA). Maintaining dialogue with PINS will enable adjustments to be made as required.

Headline Actions

- Establish a service level agreement with PINS
- Maintain dialogue as appropriate

4.1 INTRODUCTION

In preparing the original scope and purpose of this strategy, guidance was sought on key preliminary tasks recognised as including:

- gaining political and public support;
- organisation and project management;
- resource requirements;
- inclusion in local development schemes;
- links to core strategies;
- consistency with district development plan documents;
- conformity with statements of community involvement;
- key data requirements; and
- arrangements for annual monitoring.

In preparing this strategy and considering the risks to production of the JWDPD, two key themes have become evident: the need to put public and political participation at the heart of the process; and the need to establish key principles for waste management throughout Greater Manchester.

4.2 GAINING POLITICAL AND PUBLIC SUPPORT

Comprehensive involvement of the public, politicians and other stakeholders and the production of a soundly based JWDPD provide effective mechanisms through which to manage many of the risks presented in *Section 3*.

Stakeholder involvement, right from the start of the plan making process is a priority task. Waste management has too often been seen in isolation: politicians and officers have considered it a technical topic, irrelevant to other priorities; the public is not interested until a new facility is proposed close to their home. A change in these attitudes will significantly reduce the risks outlined above but can only be achieved over the longer term. This strategy proposes recommendations for change.

Produce a consultation strategy

The consultation strategy must be fully integrated within each district's SCI. It should draw on each district's SCI but clearly demonstrate how political and public participation will be achieved across Greater Manchester in relation to the JWDPD.

It may make reference to some specifically relevant stakeholders including:

- each planning authority in Greater Manchester;
- both waste disposal authorities;
- GONW;
- the waste industry;
- environment agency;
- social and economic partners;
- town councils/townships and strategic partnerships;
- residents groups;
- other local groups; and
- action groups, such as greenpeace and friends of the earth.

Provide training for key stakeholders and decision makers

Within many unitary authorities, minerals and waste development does not receive the same level of focus as other land uses: housing; retail; employment etc. Key stakeholders and decision makers such as Councillors and Chief Executives are therefore not always aware of the relevant issues. In order to ensure commitment to the JWDPD from all the districts, this situation needs to be addressed through appropriate training.

Establish champions of waste

Members of the Joint Committee and officers within each district should assume a role of waste champion, to form the backbone of a network for integrating waste matters throughout all the authorities. They will provide a key link to ensuring that waste is considered alongside other spatial planning concerns and that priorities or issues relevant to their own authority are considered in developing the JWDPD.

Within the North West, regeneration of land and the economy are key issues with which waste can be intrinsically linked; creating jobs in both traditional and new waste industries such as 'soil hospitals', and through viewing waste as a resource opportunities are presented in remanufacturing and the establishment of resource parks. The waste champions will enable a technical waste planning expertise to be developed within each district authority.

Stakeholders, including the WDAs, industry representatives and local interest groups, should be engaged in the process and given responsibility for delivering key messages to the wider community.

Update local development schemes with clear JWDPD production timetable

The purpose and production timetable of the JWDPD is currently missing from each of the district authorities' LDS as relevant information was not previously available. Participation will be enabled by this information being clearly expressed and widely available. All LDS are due to be revised and

resubmitted to GONW by end of March 2006. This opportunity should be taken.

Produce factsheets

Factsheets should be produced, and widely distributed, to ensure a good level of understanding throughout all those engaged in the plan making processes. A series of factsheets could be produced and widely distributed.

The first one would concentrate on basic information, such as: how much waste is produced; what happens to it currently; what are the key drivers to change. It may be helpful to discuss different types of waste and the quantities of each, but the factsheet should not focus on municipal waste. It needs to talk about all wastes and the total of waste produced within the area to give greater clarity to the magnitude of the issue to be managed.

Future factsheets could: outline different waste management technologies, following the structure of the waste hierarchy; outline issues and options of waste management; and provide update on plan production. The approach of following the waste hierarchy is proposed because it follows national policy and presents a logical sequence: we should first seek to reduce the waste produced, then reuse and recycle, but there will remain an element of waste requiring further treatment and disposal by landfill.

The factsheets could be accompanied by a letter inviting responses to its content and for recipients to indicate how they would prefer to be engaged in the process of preparing the JWDPD. They also provide the opportunity to engage stakeholders and communities continuously throughout plan making (for example in seeking consensus) and implementation (for example challenging whether targets are being met and exploring the reasons why).

Establish a network of contacts

It is not necessary for every resident in Greater Manchester to attend every workshop held, or respond to every round of consultation. Instead, a network of contacts could be established to act as information channels and, potentially, champions of waste. Gaining responses from the factsheets will assist in setting up that network. Use should also be made of existing networks, including town councils/townships and strategic partnerships, and existing communication channels, such as youth work groups. Tapping into and developing these existing networks brings additional benefits, enabling the integration of waste management more fully into other concerns and ensuring a broader level of debate on waste management issues.

Prepare local agreement and establish Joint Committee

To streamline the decision-making process and to reduce the risks to delivery of the JWDPD a Joint Committee should be established. ODPM advice,⁽¹⁾ 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.

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

- membership of the JC (elected representation from all districts);
- meeting arrangements;
- the structure for reporting to the JC;
- maintaining dialogue with each district's relevant committees and Full Council;
- Examination arrangements; and
- methods for ensuring commitment to the JWDPD throughout its development.

Establish JWDPD Steering Group, with MOU as appropriate

The GMGU has undertaken responsibility for production of the JWDPD. This does not relinquish the ten district authorities from their responsibilities to develop and implement the policy. The Joint Committee and the GMGU should be supported by a JWDPD Steering Group made up of officers from each district, with representation from other relevant bodies (eg the WDA, AGMA and GONW) as appropriate. A memorandum of understanding may be beneficial to secure the level of expected commitment and to establish relevant items such as: chairmanship; meeting arrangements; and role of the Group.

Establish roles of the GMGU

The GMGU is ultimately responsible for ensuring that technical work is completed on time, that the Joint Committee is used effectively and for delivering a submission and adoption document to each of the district authorities to go before Full Council. This is not an insignificant task.

The GMGU has recruited additional staff to undertake this task. It should ensure that the team structure and all relevant staff are known to the Steering Group to enable clear channels of effective dialogue.

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

Identify staff requirements

The project plan estimates that completing the technical tasks will require over 1000 days spread over a period of three and a half years. If all the tasks were undertaken using consultancy support this might cost up to half a million pounds over the same time period. This estimate includes no provision for day to day activities involved in preparing the JWDPD such as: project management; consultant management; dealing with queries from general public; administration; preparing reports for committee; committee meetings etc.

Many of the technical tasks may be undertaken by the GMGU team. However, some consultancy support will be necessary to provide waste planning expertise and capacity. A review of the tasks expected to be undertaken by consultants would enable a more accurate estimate of resource requirements, and associated costs, for production of the JWDPD. It may also be advantageous to set up a 'call-off contract' for consultancy support. In this way external resources can be called upon without the need to go through a tendering exercise each time they are required.

Prepare consultation strategy and recognise resource requirements

There will be further resource requirements, including external costs, associated with producing and publicising documents and consultation initiatives: booking venues, catering etc. The likely resource requirements and costs associated with consultation will depend on the methods chosen and how much integration can be achieved with the WDA and/or districts. These details are still to be determined through production of the consultation strategy.

Identify independent examination resource requirements

The independent examination will also require significant resources; again these are expected to be sourced both internally and externally. The project plan has estimated a period of 20 days for the independent examination. An early discussion with PINS of its expectations for the examination will be useful. Further, PINS is due to provide guidance on expected costs of inquiries, this advice should be sought as soon as it is available to better realise the associated costs of the JWDPD independent examination.

INCLUSION IN LOCAL DEVELOPMENT SCHEMES, CONSISTENCY AND CONFORMITY WITH DISTRICTS' LOCAL DEVELOPMENT DOCUMENTS

Inclusion in Local Development Schemes

It is necessary for relevant details of the JWDPD to be included in each district's LDS. All districts' LDS are due to be revised and resubmitted to GONW by end of March 2006. This opportunity must be taken to ensure that

the purpose, scope and timetable of the JWDPD is included, so it can be formally agreed by GONW.

Establish links to core strategies

Advice from ODPM is that each district authority can have only one core strategy. Therefore, each will need to include strategic policy relevant to waste management. 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.

The JWDPD Steering Group as a whole should ensure that each core strategy properly reflects the key planning objectives of PPS 10 and provides suitable strategic waste management policy.

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 district's core strategy. It should be recognised that this is unlikely to be clean or straightforward task with regard to the disparate timescale for core strategy preparation across the Greater Manchester authorities.

Ensure consistency with other development plan documents

PPS 10 seeks to ensure that waste management is integrated with other spatial planning concerns. The JWDPD must be prepared to be consistent with other DPD being produced by the ten districts and with reference to each district's community strategy. This task will be most effectively managed through the Steering Group, providing a clear review and advisory role.

Similarly, each of the districts within Greater Manchester is developing a range of thematic development plan documents, 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.

Conformity with Statements of Community Involvement

A consultation strategy should be prepared that will be an integral part of each district's SCI.

A strategy specific to the JWDPD is required because the document will apply across the whole of Greater Manchester and it would be inappropriate for it to be developed through different consultation initiatives across all ten authorities. Additionally, not all the authorities will have an SCI in place for commencement of the JWDPD. In this situation, the consultation strategy temporarily takes the place of the SCI.

Conformity with SCI will be achieved through reference to those SCI that have been prepared in drafting the consultation strategy.

4.6

KEY DATA REQUIREMENTS

Key data requirements are concerned with:

- waste arisings and growth rate;
- waste management capacity; and
- land availability.

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.

Some key data sources include:

- NWRA;
- WDA;
- Environment Agency;
- each district authority; and
- national land use database.

4.7

ANNUAL MONITORING REPORT

Arrangements for annual monitoring should be in compliance with the legislative requirements, and include consideration of the need to understand the effectiveness of the JWDPD in delivering the required waste management infrastructure, and any effects of implementing the adopted policy.

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

Monitoring will also be required for the production of the JWDPD.

Each district should retain responsibility for preparation of its own annual monitoring report (AMR). The GMGU should assume responsibility for preparing the JWDPD related inputs for each AMR.

5 *GUIDANCE AND RECOMMENDATIONS ON KEY STAGES OF PLAN PREPARATION*

5.1 *INTRODUCTION*

Planning Policy Statement 12 provides a diagram of the development plan process (refer Figure 4.1 on page 31). The paragraphs following this table indicate the steps required to be undertaken at each of the identified stages. This strategy does not propose to repeat this advice, but to identify matters that are not raised in PPS 12, and provide guidance and recommendations on how they may be managed, building on advice already presented.

On the basis of this draft strategy, key stages of the JWDPD are potentially identified as:

- stakeholder involvement/community engagement;
- preparing development plan documents;
- site identification process;
- need assessment; and
- integrating the sustainability appraisal .

5.2 *STAKEHOLDER INVOLVEMENT/COMMUNITY ENGAGEMENT*

Central Government expects stakeholder involvement and community engagement throughout all planning processes. This does, inevitably, result in resources being stretched and a need to prioritise actions. Nevertheless, waste management needs to be given a high level of priority: it is an integral service to all other development and it has been disregarded for too long.

Establish JWDPD Joint Committee and Steering Group

The principles of the Joint Committee and Steering Group have been presented previously. Representatives from all ten authorities of the AGMA should meet regularly to discuss the progress and direction of the JWDPD. It is an area of planning that must be relevant to them all in determining other spatial planning concerns, and their commitment to the process will be paramount when dealing with detailed matters such as site allocation.

Engagement with external stakeholders

In terms of engaging other communities and stakeholders there is a need to be flexible and creative in preparing a consultation strategy. Establishing new networks and tapping into existing communication partnerships provide one method of effectively gaining access to a broad range of communities without re-inventing the wheel. Traditional methods of consultation such as leaving documents and response sheets in libraries or web sites, workshops and postal surveys work well and have their place. But these should also be

supplemented by regular information and constant dialogue, which may be achieved by going to meetings of groups rather than expecting community representatives to come to workshops of the JWDPD. Methods for gaining access to 'hard to reach' groups should also be explored and might include leafleting stations to inform commuters, or baby care shops for young mothers.

To avoid 'consultation fatigue' it should be possible to piggyback on other communication initiatives, especially where the purpose is simply to inform or validate, rather than requiring detailed debate.

There is a wide range in the types of consultation methods available to engage with local communities and the reasons why they might be chosen. *Table.5.1* outlines, without prejudice, some methods that might be employed.

Companion guides to both PPS 12 and PPS 10 also provide useful advice on engaging with communities and stakeholders.

Table.5.1 *Reasons and Methods for Community Engagement*

Method of engagement				
Reason for engagement	Objective	Example tools	Output	Other comment
Influence	To alter the opinions & attitudes in favour of a proposal	Publicity, direct mail, advertising, letter writing, talkback campaigns Involves the promotion of beneficial behaviours	Altered community attitudes and choices	Not recommended where public conflict already exists.
Inform	To provide the public with information, to increase understanding and awareness	Door knocking, brochures, fact sheets, media stories, advertisements, stalls, web sites, seminars, public information nights	Improved public understanding	Appropriate where information gaps are a problem and knowledge is relatively certain. Siting issues often involve questions of social values, equity, environment and trust; these require judgements rather than information.
Consult	To obtain feedback and constructive comments from the public on a draft strategy or proposal	Documents for comment, surveys, workshops, public meetings, area committees.	Critical comments and alternatives for a particular proposal	Conventional consultation methods are now being superseded by more integrated methods where the potential for conflict is high and decisions have not yet been made.
Involve	To work directly with the public, constructively discussing issues and eliciting views. The aim is to understand public concerns and values, and ensure public knowledge is gathered.	Workshops, community consultative committees, deliberative polls, citizen panels.	A detailed understanding of community knowledge, perspectives, values, and preferred options.	Facilitated workshops and similar methods are valuable when community knowledge or values need to be gathered and interpreted.

Method of engagement

Partner	<p>To establish genuine collaboration between public representatives, technical experts and decision-makers.</p> <p>The aim is to resolve conflict over evidence, interpret expert knowledge, understand and explore opposing views, solve problems, and find common ground.</p>	<p>Interactive workshops, collaborative project committees, consensus decision making processes</p>	<p>Locally-sensitive decision-making, conflict resolution, with increased legitimacy and public trust.</p>	<p>Most useful when need to bring together a mix of views into a single 'round table' discussion.</p>
Empower	<p>To devolve decision-making to a community-based body or to the community at large through a referendum.</p>	<p>Management committees, referenda</p>	<p>Locally-sensitive decision-making with a high level of legitimacy</p>	<p>Not recommended for this project, although are used within the UK. For example, the recent referenda regarding directly elected Mayors for English Unitary Authorities.</p>

General comments

All development plan documents need to be drafted on the basis of a **sound evidence base**. Planning Policy Statement 12: Local Development Frameworks outlines matters that local authorities should keep under review, and in regard to the JWDPD this should be supplemented with an understanding of:

- regional apportionment, once determined;
- all waste produced within Greater Manchester;
- waste management capacity within Greater Manchester;
- significant non-waste proposals within Greater Manchester (for example regeneration projects); and
- land based designations and other constraints to development (including national park boundaries).

Relevant local groups and stakeholders should also be involved in this process, including the waste industry and WDA. It is known that WMBC has already undertaken a site search exercise in conjunction with its contractor. The GMWDA has also undertaken some site search work in preparation for its PFI contract. Whilst care would need to be taken that this information does not skew final conclusions, the work should be sought and referenced.

In preparing all the development plan documents it is important to maintain an **audit trail** of the decisions that have been taken, especially where decisions have been influenced by debate or the Sustainability Appraisal.

Policies should be framed in a positive manner and, unless evidence is found to justify otherwise, should not be technology prescriptive.

There is a strong emphasis on site identification and this is supported by national policy. However, it also helps to be explicit about the role of the development control policies; that they are required in order to deal with unexpected circumstances or sites.

Developing policy for key principles

The JWDPD should establish a sound planning strategy, providing a framework for waste management in its widest sense, incorporating: issues not directly related to land use; a basis for site allocations; and policy for development control decisions.

In developing the key principles policy there are questions that should be addressed, including the following:

- does it seek a reduction in the growth of waste?
- should waste management in Greater Manchester aim to achieve or exceed national and regional targets?
- where should new waste related development be focussed?

The **waste hierarchy** is expected to provide the framework for establishing the necessary waste management infrastructure. The key principles policy is concerned with the underlying basis of distributing facilities to meet waste management needs across Greater Manchester and the waste hierarchy provides a sound structure for its approach. As such, this policy might be expected to include:

- the waste hierarchy, including minimisation, reuse, recycling and market development;
- how to deal with the remaining residual waste in terms of processing;
- roughly how much waste might be expected to be disposed of to landfill;
- principles of self-sufficiency for Greater Manchester, including consideration of exporting waste, if relevant; and
- development control issues such as landscape designations and other constraints to development.

It is also expected to include some element of geography, for example recognition of green belt or areas of outstanding natural beauty, and how boundaries shared with the Peak District National Park will be managed.

It is important to remember the JWDPD must provide a planning strategy for **all waste streams**. As such, the evidence gathering phase will need to identify the quantity of each waste stream in order to inform policy development. There has been no discussion to date of:

- hazardous waste - likely to be an issue in the North West;
- agricultural waste - may not be high priority in Greater Manchester; or
- waste water - likely to be an issue.

Site identification process

PPS 10 expects development plan documents to identify sites and areas suitable for new or enhanced waste management facilities. There are numerous methods for identifying sites that have been used with different effect. A fundamental issue to remember is to make sure that the method is fit for purpose and is not unnecessarily prescriptive or complicated - keep it simple to understand and to explain.

The project plan presents a timetable that includes consideration of key principles prior to site identification. It is important not to get too far

advanced in preparing site allocations and subsequent development control policies before key principles have been identified, if not agreed. This will minimise the risk of challenge against the proposed site allocations.

This staggered approach also provides the opportunity to identify other specific development control policies that may not have been previously realised. In terms of resources, it enables all the decision makers to focus on one priority area at a time.

Use partners, public and political involvement regularly, for example:

- to suggest sites with any potential;
- to verify criteria to be used in site appraisal; and
- to comment upon conclusions drawn for each site – what would make an unacceptable site acceptable and vice versa.

Look for opportunities to enhance existing waste management facilities as well as for new sites. The ability to expand or enhance existing facilities will be dependent on a number of factors and could make the site assessment exercise unnecessarily cumbersome. To avoid this some limiting criteria could be applied, such as: only considering operational sites of more than 5 years old; or only considering the spare capacity of existing sites that have been successful through a series of preliminary sieves.

Need assessment

Need assessments involve consideration of a range of scenarios based on growth rates and waste management capacity in order to assess the level of need over a period of time. The introduction of regional apportionment, and the expectation that adopted regional policy will not be reconsidered in terms of its content or annual rates of waste to be managed, largely removes the issue of need from the local authority.

Nonetheless, until regional policy is adopted it remains necessary to understand current and permitted levels of capacity, identified by facility type. It would take a great deal of time and financial resources to gain a precise understanding of these capacities, which should be expected to change as new facilities come on stream and others are closed. Instead, a useful and confident level of understanding should be sought.

The data required will be available from the Environment Agency, in regard waste management licences, and from each local planning authority, in regard tonnages expressed in planning application forms, or as may be limited by planning conditions. For greater accuracy, and to understand the issue of 'spare capacity' it may also be necessary to contact operators.

A template should be prepared in order to gain information from the local planning authorities; this will make it easier for each authority to understand the information being sought and enable data collection in a consistent format.

5.4

INTEGRATING THE SUSTAINABILITY APPRAISAL

Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment Directive (European Union Directive 2011/42/EC) must be undertaken when preparing a development plan document. The main purpose of sustainability appraisal (SA) is to appraise the social, environmental and economic effects of plan strategies and policies so that decisions can be made that accord with the objectives of sustainable development. It should be started as soon as the new or revised local development plan document is considered and provide input at each stage when decisions are made.

It is important to remember that the SA is not a decision making tool in itself. It is an **iterative and systematic process** for measuring plan strategies and policies against sustainability indicators. It should inform the decision makers, not make the decisions. Sustainability appraisal clearly has an important role to play and time needs to be built into the process to ensure that conclusions can be considered and used to inform preparation of the plan strategies and policies.

Independence of the SA can be accomplished by establishing a separate steering group from that set up for preparation of the JWDPD. If comprised of relevant officers from each of the district authorities, this would also bring the advantage of enabling consistency throughout all SA being undertaken and effective sharing of information.

Sustainability appraisal should be used in identifying indicators for **monitoring** implementation of the JWDPD, as presented at *Section 4.7*. In time this will lead to the identification of issues to inform the need for action or the revision of the document.