



PARTIAL REVIEW OF REGIONAL  
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Waste  
June – July 2008

A CONSULTATION REPORT

## **North West Regional Assembly**

### **PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –**

Consultation on the Draft Options: Waste

A consultation report from

#### **CAG Consultants**

in association with **Concept 4 Creative and Community  
Consultants**

July 2008

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# **Contents**

**Introduction to this report**

**Workshop Responses**

**Draft Project Plan**

**Responses by question**

**Appendix One – Options for Waste**

# Introduction

This report brings together the collated responses to the North West Plan Partial Review consultation on the options for Waste.

The consultation took place between 1<sup>st</sup> June and 4<sup>th</sup> July 2008 and focussed on seeking out stakeholder views on a series of options. These options are show in Appendix One.

Stakeholders were invited to contribute their views in one of the following ways;

- Workshops for stakeholders
- An online or paper questionnaire
- Via a free phone number

Stakeholders had also had the opportunity to comment at the earlier Consultation on the Draft Project Plan stage.

The consultation activity is discussed in more detail in the full project report. This report outlines what people told us about the options in these themes through the methods outlined above.

Section One lists the workshop responses and Section Two the Draft Project Plan Responses and Section 3 lists the responses received. These responses were received through the online questionnaire, the paper questionnaire, the free phone line and by letter.



# 1. Workshop Responses

In this section we draw together all the information given to us by stakeholders who came to the workshops. For this theme there were two workshops in the consultation period; both for all stakeholders.

## The Evidence base

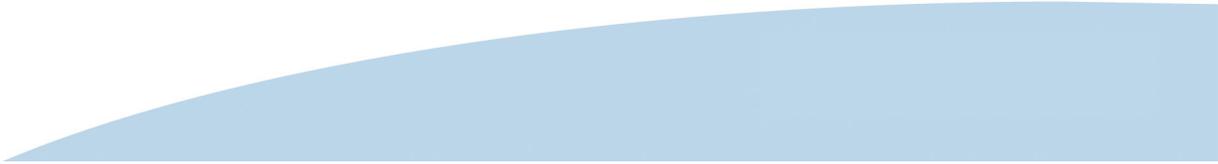
In both workshops participants felt that **no decision could be concluded without viewing the evidence base**. Once the evidence base would be made available, the participants usually felt they would be able to respond.

However one group of participants suggested a possible 4<sup>th</sup> option-that national or large-scale regional facilities may cater for the whole region and beyond.

## Consultation input

Overall, and in response to the lack of the evidence base participants used the workshops to clarify issues and discuss the wider implications of waste policy rather than feed in to the consultation.

The key points raised by participants included;

- Within existing reports (e.g. Jacobs Report) there is confusion on certain definitions, such as 'regional scale facility'-types of waste, quantities and waste hierarchy
  - Different sites are required to deal with different types and quantities of waste to ensure viability of facilities
  - Certain terminology will need clarification or redefining, such as 'indoor' (incineration) and 'outdoor' (recovery)
  - Consideration needs to be given as to whether PPS 10 remains valid
  - The environmental implications of exporting waste from one authority/country to another needs to be addressed
  - Landfill tax is having an impact on commercial waste, businesses try to economise by reusing/recycling to avoid disposal cost
- 

- There is a need to be proactive as opposed to reactive accounting for long lead-in times for the building of sites in relation to site acquisition, financing, relevant permissions and construction
- Sub-regional constraints such as ability to provide facilities such as landfill need to be considered
- Many Local Authorities aspire to be self-sufficient in municipal waste management and are currently working on technologies to achieve this-incineration, mechanical biological treatment etc. Perhaps, it would be more sustainable to deal with some waste (e.g. aluminium), inter-regionally/nationally
- There are constraints relating to waste management such as implications of rural sites, geographic locations, flood risks (flash and rising sea levels) and environmental factors.



## 2. Draft Project Plan Stage Responses

At this stage a summary of all responses showed the following key issues;

1. It is important that the provision of a waste facility does not drive down work towards improving waste minimisation;
2. Any plans need to be based on robust evidence;
3. Householders, industry and the private sector may still need more education in this area, possibly linked to incentives; and
4. Any North West policies need also to consider nuclear waste.

Comments received at this stage included;

<b>Organisation:</b>	<b>2e. Waste.</b>
Individual	Coordination and implementation of a long-term Waste Management strategy can only be achieved through the education of both industry and the private sector. The use of innovation and enhanced waste management systems can only enhance the environment and if managed correctly could establish a standard of Global Best Practice.
Individual	NW TAR supports the position of the North West Waste Froum
Individual	Trafford Council's waste policy while laudible in its 20/21 strategy in practice does not work so exasperated householders regularly use the landfill sites with waste intended to be recyclable
Blackpool Equalities Forum	We found that there had generally been a good response to recycling initiatives in Blackpool, and that a commitment to reducing waste should be incorporated in local plans. Blackpool is home to many businesses in the Leisure and Tourism sector (pubs, hotels, shops). We do not appear to be doing enough to encourage these businesses to recycle. Waste is collected in single bags/containers and not

Organisation:	2e. Waste.
	sorted for recycling. Business owners can opt to pay a contractor to collect recyclables, but this is at their own (additional) expense. As a result, there is no incentive for businesses to recycle; ideally we would like to see commercial waste brought up to the same standards as domestic. We considered types of waste that are more common in a tourist area: Plastic bags (shops), glass bottles (hotels and bars), leaflets and brochures. Issues surrounding additional waste during the holiday season, due to visitors.
The Wildlife Trust for Lancashire, Manchester & North Merseyside	There needs to be a clear focus on driving waste minimisation up the hierarchy. Care should be taken not to identify types of treatment facility that might slow or prevent this process.
Local Agenda 21 Waste Group	<ul style="list-style-type: none"> <li>• What does the spatial strategy mean in terms of distance and facilities?</li> <li>• The RDA and the RA could get their heads stuck into recycling and waste facilities, especially for TVs, plastics and fridges. Proximity and precautionary principles for recycling should also be defined clearly including distance and intentions. Don't all electrical goods contain dangerous metals and chemicals?</li> <li>• People have to be educated in what types of plastics mean, once people then understand what the problems for recycling is with plastics they will respond accordingly.</li> <li>• Who is going to pay for it and how many waste transfer stations are needed? What incentives are the gov't giving to companies, what government fiscal policy is in place?</li> <li>• We need key recycling centres; that's why we missed EU recycling targets, ie by derogating time and again.</li> <li>• We should be encouraging companies to use recycled products such as plastics etc thus creating jobs in the North West and reducing CO2 emissions through reducing shipping to and from Eastern Countries. We need government incentives then we start to succeed.</li> <li>• New waste processing plants must be away from built up housing areas and adjacent to motorways or dual carriageways.</li> <li>• The main thing I am trying to emphasise is the lack of education of the public at large</li> <li>• The nimbyism attitude of some communities has to be addressed.</li> <li>• Local Authorities should be very careful how they negotiate waste contracts with land fill operators as punitive charges can arise.</li> <li>• Can this consultation act as an education working tool when it comes to best practices in place? For example: <ul style="list-style-type: none"> <li>○ Recycling and separating of co-mingled waste Warrington is starting a programme with a</li> </ul> </li> </ul>

<b>Organisation:</b>	<b>2e. Waste.</b>
	<p>second bin for some types of waste for recycling but have missed the point of separation within the household</p> <ul style="list-style-type: none"> <li>○ Anaerobic digestion</li> <li>○ Separate food collections</li> <li>○ The use of land fill trading allowances / schemes</li> <li>○ Last resort incineration as to land filling.</li> <li>○ How much compost can the economy sustain and quality of compost needs assessing.</li> </ul> <ul style="list-style-type: none"> <li>• We also need to consider separate collections for putrid waste collection (household food and pet waste) and possible clinical and surgical waste from households</li> <li>• To avoid punitive charges and potential conflicts of interest Local Authorities should be encouraged to privatise the whole of the waste management and disposal system.</li> </ul>
Environment Agency	<p>The Environment Agency will, through the RTAB, provide comments and data to assist the Assembly with preliminary work around identifying broad locations for nationally and regionally significant waste management facilities. To date we have provided our joint comments on the outputs of the initial piece of work on waste management facilities, outlining our concerns with it. In view of the concerns raised we strongly urge that care be exercised when using this to inform the partial review. Similarly it should be noted that RTAB intends to ask the Regional Assembly to endorse only specified items of research when undertaking this element of the Partial review. We would therefore welcome the opportunity to work with you and other RTAB members to ensure this element of the partial review (and any necessary additional technical evidence) is progressed as early as possible, utilising robust and up to date evidence and data.</p>
Upton Greenbelt Preservation Group	<p>No evidence has been provided for the need for a Regional potentially National scale waste facility in the North West Region. The very large capacity and inflexibility of the processes would demand a constant and continuous supply of waste materials to ensure efficient and economic working. This would lock into one site a centralised system tending to work against waste minimisation and re-use which are both higher in the Waste Hierarchy. Consequently any successful waste reduction in the local area would result in an increase in the implementation of waste from further a field. The managing of waste as near as possible to its place of production to minimise the environmental impact of transporting waste advocated by the Proximity Principle would be contravened.</p>
North West Environment Link	<p>There needs to be a clear focus on driving waste minimisation up the hierarchy and care should be taken not to identify types of treatment facility which might slow or prevent that process.</p>
University of	<p>The inclusion of a stated position on the storage of nuclear waste (whether above ground as currently at Sellafield, or in a new underground storage facility) within the region should be considered given that,</p>

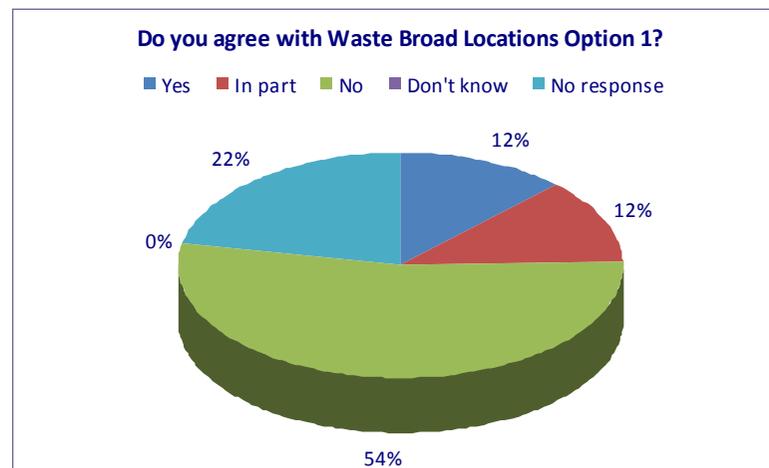
<b>Organisation:</b>	<b>2e. Waste.</b>
Cumbria	potentially, new nuclear power stations could be on line as early as 2017 (well within the timescale of the RSS).

### 3. Questionnaire and other Responses

## 1.1 Do you agree with Waste Broad Locations Option 1?

When asked this question people told us.

Do you agree with Waste Broad Locations Option 1?	
Yes	6
In part	5
No	22
Don't know	0
No response	9
<b>Total Responses</b>	<b>42</b>



The table below shows the verbatim comments received in more detail. We have removed 6 blank responses.

Organisation:	1.1. Do you agree with Waste Broad Locations Option 1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
On behalf of WRG	No			See response to Option 2 PPS 10 notes in paragraph 3 that "regional planning bodies should provide a framework in which communities take responsibility for their own waste" which would suggest that a sub-regional approach to identifying treatment requirements should be taken. Paragraph 6 of PPS 10 notes that that an RSS should... 'comprise a distribution of waste tonnage requiring management, a pattern of waste management facilities of national regional or sub regional significance, and supporting policies'. Paragraph 11 goes on to explain that the RSS should identify... 'the waste management facilities required to satisfy any need and their distribution (our emphasis) across the region.' Based on this guidance WRG considers that it is necessary for the RSS to identify the number and type of facilities for each sub region. Therefore Option 2: Sub- Regional Approach is considered to be the appropriate

Organisation:	1.1. Do you agree with Waste Broad Locations Option 1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>approach. The purpose of regional policy is to provide clear guidance to the constituent authorities in drawing up their development plan documents. As part of this process it is important that clear instruction is provided on the number, scale and type of key facilities required in each sub region. Failure to do this would leave the sub-regions unclear as to the extent of the requirement to provide facilities within their areas, and would provide no clarity to stakeholders as to the waste management requirements in different parts of the region. Whilst both approaches intend to apportion waste arisings by sub region/waste planning authority area, it is important to translate this into a requirement for specific numbers and types of facilities in each sub/region. Some sub regions/authorities may be unable to accommodate sufficient facilities to deal with their waste arisings, eg urban areas may be unable to accommodate sufficient landfills for their residual waste arisings. It is therefore crucial that this issue is examined at a regional level as this may impose an additional burden on other sub-regions/authorities who may not be willing to accommodate facilities from other regions without an evidence based apportionment exercise such as that carried out in the South East and East of England Regions with regards to London's residual waste. It is only by setting out each sub-region's requirements at a regional level that this issue can be identified and resolved. It is considered to be a fundamental function of regional policy to undertake this allocation. The North West Region is a large and varied Region with a pronounced elongate north- south axis. To provide a single list of key waste management facilities that are required for the whole region would provide little in the way of clear instruction or guidance for individual sub-regions/authorities.</p>		
Northwest Regional Development Agency	Yes	<p>The Agency would support a regional approach to this issue. Option 1 would allow for the identification of broad locations for regionally significant waste management facilities, based on regional waste arisings apportioned by sub-region without being too prescriptive about where these should be placed within individual sub-regions. The detail would then be picked up in individual sub-regional/WPA waste plans. Although Option 1 is presented as a regional approach, the identification of 'broad locations' within the region will, by</p>		

Organisation:	1.1. Do you agree with Waste Broad Locations Option 1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		necessity, identify locations within a sub-region or across sub-regional boundaries.		
GONW		There appears to be the omission of the consideration of Construction, Demolition and Excavation waste arisings as recommended by the Panel.		
Halton Borough Council	No	This option relies heavily on a top-down approach to waste planning. However it is not clear how regional facilities will be dealt with if Option Two is chosen. It is anticipated that some facilities, due to commercial requirements/costs in construction and operation, would need to serve the region to be economic.		
The National Trust	No	If waste arisings are being identified at sub-regional/waste planning authority area then it is appropriate to identify broad locations within each sub-region. This would also be consistent with the 'proximity principle' in terms of treating waste as close as possible to where it arises.		
Cumbria County Council	No	<p>Figures for the large Commercial and Industrial waste stream (C and I) have always caused problems. I am concerned that the impression is given that the commercial and industrial figures in the Proposed Changes are actual measured figures eg from statutory returns. They are estimates derived from the sample surveys commissioned by the North West Waste Planning Authorities with no correlation to the figures published by the Environment Agency, from its waste returns, for the amounts and types of management of these wastes. There are significant differences between the two sets of figures and I think a "health warning" needs to be included. I give examples of the differences below: C and I waste managed in Cumbria from EA 2002/3 722,275 tonnes; 2004/5 541,944 tonnes; draft RSS 750,000 tonnes/year; RSS proposed changes 849,000 tonnes/year. C and I waste landfilled in Cumbria from EA 2002/3 425,224 tonnes (59%) ; 2004/5 291,500 tonnes (54%).draft RSS 350,000 tonnes/year (47%); RSS proposed changes 224,000 tonnes/year (26%). Whilst such rapid diversion from landfill would be welcomed it is not clear how realistic the assumptions are. I also do not know why such a large increase in the total C and I waste has been assumed. At the EIP I argued that the assumption made in the draft RSS that there would be no change in the way</p>		

Organisation:	1.1. Do you agree with Waste Broad Locations Option 1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		these wastes are managed was unrealistic because of the strong drivers for change. I have the opposite concern now, that too rapid a pace of change is being assumed. The most important point is that business should not be constrained because inadequate provision has been made for managing these waste, this includes adequate landfill capacity. As I say above, I would like there to be a "health warning" about the figures and an explanation of the assumptions that are being made.		
The Ramblers Association, Manchester and High Peak Area	No	The Regional approach could lead to waste being transported over long distances, causing disruption to communities and wasting energy.		
Joint advisory Committee for Strategic Planning	In part	It is unlikely that a regional approach as described would provide the detailed strategic policy framework sufficient for sub-regional areas to plan for, or indeed for robust sub-regional apportionments of waste to be made at the regional level through the RSS. Specifically, it would be unlikely that such an approach would be able to identify broad locations on a geographical basis in the absence of a sub-regional analysis of the gaps in capacity. However, there are aspects of this approach that could be supported: The timeframe of 15 years to 2026 would provide the better certainty for plan-making, particularly given the enormous uncertainties that surround planning for waste, in terms of growth, its changing composition, the role and suitability of new and emerging technologies, the response of, and investment choices made by, the waste industry, emerging reprocessing markets and public perceptions etc. The focus more towards regionally (and presumably nationally) scale waste management facilities, presumably on the basis that sub-regional facilities, aligned with sub-regional planning areas, do not necessitate regional consideration.		
Sustainable Neighbourhoods Pool Manchester	No	Different waste is produced in each sub-region and should be handled on a sub-regional basis where ever possible. Dealing with waste on a regional scale facilitates large scale waste transport across the region with is in direct conflict with greenhouse gas emissions reduction. It is unfair to expect Cumbria to help deliver the disposal of the vast amount of waste produced in Greater Manchester for example, and unfair of Greater Manchester to expect other sub-		

Organisation:	1.1. Do you agree with Waste Broad Locations Option 1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		regions to deal with its waste problems. Municipal waste is a personal issue and the onus should be on individual households to be responsible for the waste that they produce and for Local Authorities to engage communities in satisfying the local waste needs of their neighbourhoods.		
Cheshire West and Chester (comments represent informal officer views)	No	<ul style="list-style-type: none"> <li>• There should be a very strong emphasis on achieving sub-regional self-sufficiency to minimise the unsustainable movement of waste</li> <li>• This will also encourage communities to take responsibilities for their own waste management</li> <li>• we are concerned about the inadequacy of evidence base – the Jacobs C&amp;I figures are flawed. This needs to be addressed immediately.</li> </ul>		
Macclesfield Borough Council	No	Although the difficulties with predicting waste arisings over a longer time period are understood, the very long planning and construction timescale associated with waste facilities means that it would be preferable to take the longest-term view possible when planning for waste.		
Haslington Parish Council	In part			
Merseyside Policy Unit	No	See our response to Waste Option 2. This option is most in keeping with current work in Merseyside to develop a sub-regional Waste Development Plan Document. The first relies too much on the imposition of a top-down approach, while the third takes predictions further ahead than we would be comfortable with. We are not comfortable that the evidence base should be taken as a given, and feel that a review of this should be linked to the proposed second study on regional facility locations.		
Stockport Metropolitan Borough Council	No			
North West Environment Link	No	The regional approach appears to militate against the aims and objectives of PPS10, particularly the aim of providing a framework in which communities take more responsibility for their own waste and that of enabling waste to be disposed of in one of the nearest appropriate installations. It also does not comply as well as option 2 with RSS Policy EM13 which states that at least primary treatment of waste should take place near the source of arisings.		

<b>Organisation:</b>	<b>1.1. Do you agree with Waste Broad Locations Option 1?</b>	<b>1.1a. If so why?</b>	<b>1.1b. If not, why not?</b>	<b>1.1c. Please explain your answer to the previous question.</b>
Liverpool City Council	No	This Option relies too much on the imposition of a top-down approach.		
Warrington Borough Council		This is a general response and not specifically related to any one option. The Jacobs study which was to provide information and evidence to this topic and the emergence of options has been withdrawn. A replacement study is now outstanding this raises issues of the soundness of the evidence base on which policy is developed and the opportunities to make comment on matters arising.		
Emery Planning Partnership	No	We consider that a sub regional approach would be appropriate to ensure a geographis spread of facilities throughout the region. Our reasons are set out in our subsequent answers.		
Carlisle City Council	No	Whilst it may be appropriate to have some information on the waste arisings for the region. RSS should not concentrate on just regional provision of facilities. The region is large and regional facilities may not be the most sustainable solution. In addition it would be a less sustainable option to consider the region in isolation rather than cross boundary issues as waste facilities are expensive to deliver		
Lancashire County Council	In part	It is unlikely that a regional approach as described would provide the detailed strategic policy framework sufficient for sub-regional areas to plan for, or indeed for robust sub-regional apportionments of waste to be made at the regional level through the RSS. Specifically, it would be unlikely that such an approach would be able to identify broad locations on a geographical basis in the absence of a sub-regional analysis of the gaps in capacity. However, there are aspects of this approach that could be supported: § the timeframe of 15 years to 2026 would provide the better certainty for plan-making, particularly given the considerable variables that surround planning for waste, in terms of its growth, its changing composition, the role and suitability of new and emerging technologies, the response of, and investment choices made by, the waste industry, emerging reprocessing markets, and public perceptions etc. § the focus more towards regionally (and presumably nationally) scale waste management facilities, presumably on the basis that sub-regional facilities, aligned with sub-regional planning areas, do not necessitate regional		

<b>Organisation:</b>	<b>1.1. Do you agree with Waste Broad Locations Option 1?</b>	<b>1.1a. If so why?</b>	<b>1.1b. If not, why not?</b>	<b>1.1c. Please explain your answer to the previous question.</b>
				<p>consideration. It does appear that this and Option 2 confuse the critical consideration for the RSS at this time, that is, in the view of the Authorities, to identify broad locations within the region for significant scale facilities to manage cross-boundary waste arisings, building upon an appreciation and analysis of the 'gaps' in capacity that can be identified at the sub-regional planning level. For that reason no one option is preferred and instead the response below seeks to identify those elements of each that together would be supported, and could readily be combined to generate a robust, coherent, and deliverable policy framework for the provision of necessary waste management capacity across the region at the waste planning authority level. The approach under all options to "use the figures for waste arisings to 2020...that will feature in the final published RSS... are an agreed given" mistakenly assumes that those figures represent the output of a robust prediction model. In truth, it is the Authorities' understanding that the figure is a simple presentation of the reported waste arisings at a recent survey date. It may be that these also present of prediction under zero growth but that has to be specified through the approach.</p>
Chorley Council	No			
AGMA (the Association of Greater Manchester Authorities)	No			<p>See comments on Option 2: AGMA's preference would be for Option 2 since this appears to provide sufficient clarity on the number and type of facilities required in Greater Manchester and the rest of the North West, and the proposed timescale would be in line with GM's current baseline data and would not require further work to extend this information to a longer time period.</p>
MJM Strategies Ltd	In part			<p>Without the results of the updated broad locations study it is not possible to confirm if the study and its inputs to the RSS will cover the main requirements for dealing with waste in the region. The estimates of arisings will need to consider delays in both the provision of new facilities and the markets for recovered materials. The types of facilities will also change as technologies are developed. The study needs to safeguard linked facilities i.e. treatment plants that need landfill or incineration plants for residues after treatment. These facilities may be in other planning areas or sub regions. In the case of regional</p>

Organisation:	1.1. Do you agree with Waste Broad Locations Option 1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		landfill sites all landfill may be considered regional, but it is essential that the provision is not so restricted as to restrict competition and create monopoly situations.		
Wirral MBC	No	The Council has already invested in the preparation of a joint Merseyside Waste DPD to identify potential needs and locations at sub-regional level. The identification of regional scale facilities could cut across this work. The accompanying sustainability appraisal appears to indicate that Option 1 would be less likely to promote opportunities for waste to be managed close to source and would be less likely to allow for the better consideration of local opportunities.		
Congleton Borough Council	No			
Cheshire East Council	Yes	Regional approach preferred over sub regional approach		
Chester City Council	No	The Council supports the principle of 'reducing' waste as advocated in the waste hierarchy in national, regional and local policy. The Council believes that regional scale facilities could result in the importing and transportation of waste between regions in order to maintain the longevity of the facility. This would breach the 'proximity principle'. Regional scale developments – being concentrated in one location - also raise concerns over the potential impact on traffic, landscape, nature conservation and air quality.		
CPRE North West	No	This option is the best fit with the aims and objectives of PPS10; in particular in comparison with Option 1 it would better “provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities;” and “enable waste to be disposed of in one of the nearest appropriate installations” (PPS10 para 3). It would also be more consistent with: <ul style="list-style-type: none"> <li>o EM13, which states that at least primary treatment of waste should take place near to the source of arisings,</li> <li>o the requirement in EM10 to reduce harm to the environment, including reducing climate change impacts,</li> <li>o the general requirement of DP5 to reduce the need to travel and manage travel demand, and</li> <li>o the requirement of DP9 to reduce carbon emissions. All these</li> </ul>		

<b>Organisation:</b>	<b>1.1. Do you agree with Waste Broad Locations Option 1?</b>	<b>1.1a. If so why?</b>	<b>1.1b. If not, why not?</b>	<b>1.1c. Please explain your answer to the previous question.</b>
				<p>considerations point a priori to the treatment of waste near to the source of its' arisings wherever possible, ie a primarily sub-regional rather than regional approach. There may in individual cases be reasons why this is not the most sustainable option, but this should be the basis of policy. Caution should be exercised with regard to identifying the type and number of facilities required. The RSS Panel Report recommended that the tables of waste arisings in RSS were simplified to indicate only the amount of waste to be treated, and the amount of residual waste requiring landfilling. They made this recommendation in response to arguments that being overly prescriptive about the type of treatment required could prevent the waste hierarchy being implemented, ie waste treatment being driven up the hierarchy and all waste being treated at as high a level in the hierarchy as possible (eg paras 8.79 &amp; 8.86-87, in particular para 8.87 "The objective should be to move waste management up the hierarchy as far as possible"). Identifying the precise type and number of facilities believed to be required at present could have the same effect, ie preventing waste management being driven up the hierarchy in future. There should also be considerable caution about developing plans for "regionally-significant", ie large scale, thermal treatment plants in particular. The very large capacity and inflexibility of processes of such plants would demand a constant and continuous supply of waste to ensure efficient and economic operation. This would lock the region into a centralised system which would tend to work against waste minimisation and driving the treatment of waste further up the hierarchy, in direct contradiction of the Waste Strategy for England and RSS policy EM11. There should be a general presumption in favour of a more decentralised pattern of waste management facilities wherever possible, as being more effective at driving waste up the hierarchy and reducing the need to travel. This presumption should only be overturned where there are clear and long-lasting sustainability benefits to be gained from larger installations. Due to the high levels of uncertainty about future waste arisings and management techniques, it would be unwise to attempt to predict arisings and requirements for treatment beyond 2026.</p>
Environment Agency	In part			It is possible that there will be the need for some regional (even national) scale

<b>Organisation:</b>	<b>1.1. Do you agree with Waste Broad Locations Option 1?</b>	<b>1.1a. If so why?</b>	<b>1.1b. If not, why not?</b>	<b>1.1c. Please explain your answer to the previous question.</b>
		<p>facilities in the NW to deal with certain types of waste. However, an approach which only identified a suite of regional scale facilities will not fit with the emphasis within RSS policy EM12 around communities taking more responsibility for their own waste and for waste to be disposed of in one of the nearest appropriate installations. What is likely to be needed is a blend of facilities (and identified broad locations) which sets out the most sustainable option for the management of waste in the NW. Please see our response to option 2.</p>		
Biffa Waste Services Ltd	No	Should be a 20 year period		
Crewe and Nantwich Borough Council	Yes	Regional approach preferred over sub regional approach.		

## 1.2. What other policy changes are required to RSS to deliver this option and why?

The table below shows the verbatim comments received. We have removed 26 blank responses.

<b>Organisation:</b>	<b>1.2. What other policy changes are required to RSS to deliver this option and why?</b>
Northwest Regional Development Agency	The waste management policy has implications for the RSS policies relating to energy from waste.
The National Trust	Not possible to comment in the absence of the necessary evidence, i.e. first and foremost the final Table 9.3 in RSS, and also the Jacobs report. Given the report was produced over 6 months ago but is not currently available it suggests that there should be an opportunity to comment upon this part of the evidence base prior to RSS Partial Review proposals being put forward (or if it is abandoned altogether for an alternative evidence base to be produced and consulted upon).
Cumbria County Council	Further consideration needs to be given to radioactive waste management, particularly in the context of nuclear decommissioning and the Managing Radioactive Waste Safely White Paper.
Joint advisory Committee for Strategic Planning	<p>Comments responding to these parts are common to all questions and are presented under Question 2: There is a need to acknowledge the potential for regional ( and national) scale waste management facilities to occupy regional identified employment opportunities, particularly so given the scale and composition of waste facilities and waste park (resource recovery) formats. this linkage between these policy areas could usefully be expressly recognised through the broad locations' approach. Section 2 The express recognition given to the Joint Lancashire Minerals and Waste Development Framework, alongside other development plans/plan documents, is very much welcomed. As you will be aware, the Authorities are at the most advanced stage of all North West Waste Planning Authorities in the preparation of a Core Strategy. It is anticipated that adoption could occur as soon as February 2009. Similar consideration must also be given to the strategies and commitments of Waste Disposal Authorities across the North West for managing municipal waste. These programmes for delivering long-term municipal waste management capacity are at very advanced stages (for Lancashire and Blackpool facilities are already under construction and will be operational from 2010) and will render regional consideration of this waste stream largely meaningless.</p> <p>Section 1 The express recognition given to the "considerable debate" underway in relation to Jacobs' study is welcomed, and, as one who shares those concerns over its approach and its findings, the Authorities support the Assemblies intention to commission a new study in this regard. Similarly, the acknowledgement of errors in the published Proposed Changes relating to commercial and industrial waste arisings is welcomed, and indeed it was the Authorities that first raised those concerns in response to the Proposed Changes to the RSS. The statement made that it is the intention to take as given for the Partial Review process the waste arisings figures</p>

<b>Organisation:</b>	<b>1.2. What other policy changes are required to RSS to deliver this option and why?</b>
	that will feature in the final published RSS is a cause for some concern, given the uncertainties over the models and methods to predict those figures, the absence of any predictive work on the figures published for consultation in the Proposed Changes, and the need to establish, and consider the implications of, the framework of targets and actions arising out of the national Waste Strategy 2007 and sub-regional strategies that are being implemented at the present time.
North West Environment Link	As NWEL favour the sub-regional approach, we did not consider this question
Lancashire County Council	There is a need to acknowledge the potential for regional (and national) scale waste management facilities to occupy regional identified employment opportunities, particularly so given the scale and composition of waste facilities and waste park (resource recovery park) formats. This linkage between these policy areas could usefully be expressly recognised through the broad locations' approach.
RPS	The RSS needs to provide a policy framework that achieves greater inter-relationship between spatial issues and related policy objectives. In particular in making provision for strategic waste management and capacity for communities to manage waste close to where it arises, combined with the consideration of planned growth areas/points within the region, measures for mitigation of and adaptation to climate change as well as opportunities for securing renewable energy supply. In accordance with Paragraph 13 of Planning Policy Statement: Planning and CLimate Change, policy within the RSS should include scope for securing decentralised energy supply systems especially from renewable or low carbon energy sources which include energy from waste facilities. RSS should acknowledge energy from waste facilities as a significant renewable energy supply especially where opportunities exist to supply existing or potentially nearby energy users and planned growth areas. The integration of policy objectives indicated above is consistent with national guidance for waste management, energy and climate change strategies. In addition, in planning for future growth RSS should include provision within policy that recognises the potential role of the Green Belt in meeting the particular locational needs of some types of waste management facilities. This is recognised within the key planning objectives of PPS10: Planning for Sustainable Waste Management with Particular reference to:- "Protecting Green Belts but recognizing the particular location needs of some types of waste management facilities when defining green belt boundaries..."
MJM Strategies Ltd	The waste policies re broad locations and the renewable energy locations should be reviewed together as some locations may be common. The emerging technologies re gasification and biogas will use waste to produce electricity. The importance is demonstrated by the INES Chlor and Ince Moss proposals.
Environment Agency	An approach which only identified a suite of regional scale facilities to manage waste would as a minimum require a change to policy EM12 as there would be potential for facilities to be located further away from sources of waste. EM13 could also require change (beyond that which is already envisaged) as this specifically

<b>Organisation:</b>	<b>1.2. What other policy changes are required to RSS to deliver this option and why?</b>
	suggests that the focus for treatment of commercial and industrial and municipal waste should be close to the source of arisings.

### 1.3. In taking forward this option, what are the implications for:

The table below shows the verbatim comments received. We have removed 27 blank responses.

Organisation:	1.3. In taking forward this option, what are the implications for:
Northwest Regional Development Agency	<b>A) Delivery:</b> -
	<b>B) Infrastructure provision?</b> This is a technical issue and the Agency does not have the evidence with which to comment.
	<b>C) Community and social issues?</b> -
	<b>D) Environment?</b> -
	<b>E) Economy?</b> -
The National Trust	<b>A) Delivery:</b> Not known without the evidence base.
	<b>B) Infrastructure provision?</b> Not known without the evidence base.
	<b>C) Community and social issues?</b> Not known without the evidence base.
	<b>D) Environment?</b> Not known without the evidence base.
	<b>E) Economy?</b> Not known without the evidence base.
Joint advisory Committee for Strategic Planning	<b>A) Delivery:</b> Comments responding to these parts are common to all questions and are presented under Question 2. Delivery is reliant on a private waste industry that is, perhaps for understandable reasons, investment-shy at this time. In that sense, the rationale to the approach to identifying broad locations recognises the economies of scale and necessary scale of markets or catchments that will prompt delivery of these scale of facilities. It is noted that Section 1 correctly flags up the need for effective cross-boundary working relationships to support the approach to identifying broad locations and delivering this through agreement at the sub-regional level. Representations were made by the Authorities to the submitted draft RSS on this matter, which sought to highlight the approach taken to securing cross-authority agreement, specifically a form of policy wording that was progressed through the earlier partial review on waste and it is understood through initial drafts of the more recent RSS review.
	<b>B) Infrastructure provision?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-

<b>Organisation:</b>	<b>1.3. In taking forward this option, what are the implications for:</b>
	<p>regional and development control processes.</p> <p><b>C) Community and social issues?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p> <p><b>D) Environment?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p> <p><b>E) Economy?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
Haslington Parish Council	<p><b>A) Delivery:</b> -</p> <p><b>B) Infrastructure provision?</b> -</p> <p><b>C) Community and social issues?</b> -</p> <p><b>D) Environment?</b> The proximity rules need to be applied to all waste including green waste for composting.</p> <p><b>E) Economy?</b> -</p>
North West Environment Link	<p><b>A) Delivery:</b> see answer to 1.2 As NWEL favour the sub-regional approach, we did not consider this question</p> <p><b>B) Infrastructure provision?</b> see answer to 1.2 As NWEL favour the sub-regional approach, we did not consider this question</p> <p><b>C) Community and social issues?</b> see answer to 1.2 As NWEL favour the sub-regional approach, we did not consider this question</p> <p><b>D) Environment?</b> see answer to 1.2 As NWEL favour the sub-regional approach, we did not consider this question</p> <p><b>E) Economy?</b> see answer to 1.2 As NWEL favour the sub-regional approach, we did not consider this question</p>
Lancashire County Council	<p><b>A) Delivery:</b> Delivery is reliant on a private waste industry that is, perhaps for understandable reasons, investment-shy at this time. In that sense, the rationale to</p>

Organisation:	1.3. In taking forward this option, what are the implications for:
	<p>the approach to identifying broad locations recognises the economies of scale and necessary scale of markets or catchments that will prompt delivery of these scale of facilities. It is noted that Section 1 correctly flags up the need for effective cross-boundary working relationships to support the approach to identifying broad locations and delivering this through agreement at the sub-regional level. Representations were made by the Authorities to the submitted draft RSS on this matter, which sought to highlight the approach taken to securing cross-authority agreement, specifically a form of policy wording that was progressed through the earlier partial review on waste and it is understood through initial drafts of the more recent RSS review.</p>
	<p><b>B) Infrastructure provision?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
	<p><b>C) Community and social issues?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
	<p><b>D) Environment?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
	<p><b>E) Economy?</b> Please note comments under Delivery, in relation to economics of delivery. These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
MJM Strategies Ltd	<p><b>A) Delivery:</b> The ability to secure planning quickly is essential for delivery. Before that there needs to be secured sites which have the right locations and infrastructure in respect of power, sewers and in the case of landfill geology. The new facilities may need to operate 24/7 and this has implications re location and communities.</p>
	<p><b>B) Infrastructure provision?</b> The actual provision will be down to the bankability of the project and the provision of finance. The provision of sites that are too small or with excessive development costs will result in infrastructure not being delivered.</p>
	<p><b>C) Community and social issues?</b> -</p>
	<p><b>D) Environment?</b> Modern waste recovery and processing facilities should help to</p>

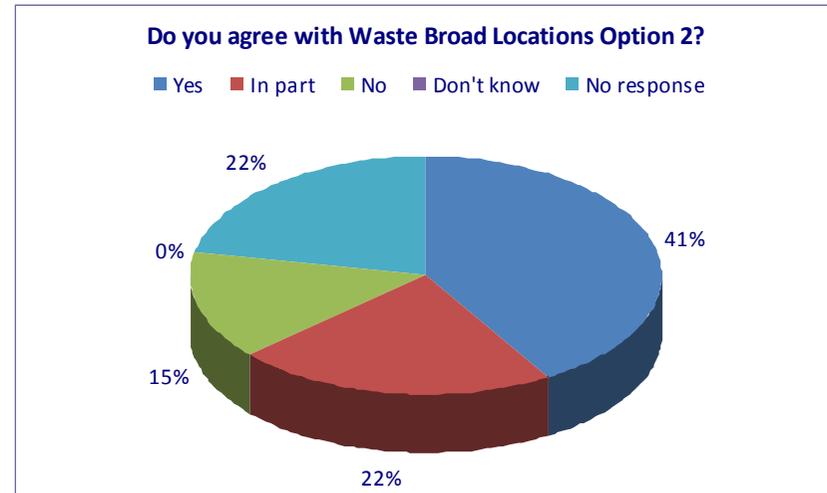
Organisation:	1.3. In taking forward this option, what are the implications for:
	<p>improve the environment and safeguard raw materials.</p> <p><b>E) Economy?</b> The investment in new waste recovery and disposal facilities will be great which should help the NW economy.</p>
Wirral MBC	<p><b>A) Delivery:</b> -</p> <p><b>B) Infrastructure provision?</b> Regional scale facilities are likely to have a far greater and more disproportionate impact on the capacity of local infrastructure.</p> <p><b>C) Community and social issues?</b> -</p> <p><b>D) Environment?</b> Regional scale facilities are likely to have a far greater and more disproportionate impact on the local environment.</p> <p><b>E) Economy?</b> -</p>
Environment Agency	<p><b>A) Delivery:</b> The Environment Agency makes this point in relation to both option 1 and 2. Para 1.2 of the options paper highlights the need to consider the development of a mechanism for cross authority working to aid implementation/delivery on the ground. The Environment Agency would like further clarification on the need for such a mechanism and the role it would play as we currently do not perceive there to be a problem with the existing informal arrangements.</p> <p><b>B) Infrastructure provision?</b> An option which only identified regional scale facilities would potentially need to consider the transport infrastructure implications of this (particularly the impact on greenhouse gas emissions and links to delivery of regional and national targets). In order to ensure such an option was as sustainable as possible, opportunities (possibly new infrastructure) would need to be maximised in relation to the sustainable transport of the waste.</p> <p><b>C) Community and social issues?</b> -</p> <p><b>D) Environment?</b> There will be potentially be impacts from waste management facilities on the environment, regardless of their scale. At the level of setting out broad locations, environmental issues will need to be considered and should guide this process. However, site specific and local impacts will be hard to identify until sites are looked at within the broad locations and schemes themselves come forward. We would expect the normal planning process to address these issues through things like EIA or</p>

<b>Organisation:</b>	<b>1.3. In taking forward this option, what are the implications for:</b>
	development control conditions (attached to any grant of permission to control impacts). The waste management licensing process will also address environmental issues.
	<b>E) Economy? -</b>

## 2.1. Do you agree with Waste Broad Locations Option 2?

When asked this question people told us.

Do you agree with Waste Broad Locations Option 2?	
Yes	17
In part	9
No	7
Don't know	0
No response	9
<b>Total Responses</b>	<b>42</b>



The table below shows the verbatim comments received. We have removed 8 blank responses.

Organisation:	2.1. Do you agree with Waste Broad Locations Option 2?	2.1a. If so why?	2.1b. If not, why not?	2.1c. Please explain your answer to the previous question.
On behalf of WRG	Yes	<p>PPS 10 notes in paragraph 3 that "regional planning bodies should provide a framework in which communities take responsibility for their own waste" which would suggest that a sub-regional approach to identifying treatment requirements should be taken. Paragraph 6 of PPS 10 notes that that an RSS should... 'comprise a distribution of waste tonnage requiring management, a pattern of waste management facilities of national regional or sub regional significance, and supporting policies'. Paragraph 11 goes on to explain that the RSS should identify... 'the waste management facilities required to satisfy any need and their distribution (our emphasis) across the region.' Based on this guidance WRG considers that it is necessary for the RSS to identify the number and type of facilities for each sub region. Therefore Option 2: Sub- Regional Approach is considered to be the appropriate approach. The purpose of regional policy is to provide clear guidance to the constituent authorities in drawing up their development plan</p>		

<b>Organisation:</b>	<b>2.1. Do you agree with Waste Broad Locations Option 2?</b>	<b>2.1a. If so why?</b>	<b>2.1b. If not, why not?</b>	<b>2.1c. Please explain your answer to the previous question.</b>
		<p>documents. As part of this process it is important that clear instruction is provided on the number, scale and type of key facilities required in each sub region. Failure to do this would leave the sub-regions unclear as to the extent of the requirement to provide facilities within their areas, and would provide no clarity to stakeholders as to the waste management requirements in different parts of the region. Whilst both approaches intend to apportion waste arisings by sub region/waste planning authority area, it is important to translate this into a requirement for specific numbers and types of facilities in each sub/region. Some sub regions/authorities may be unable to accommodate sufficient facilities to deal with their waste arisings, eg urban areas may be unable to accommodate sufficient landfills for their residual waste arisings. It is therefore crucial that this issue is examined at a regional level as this may impose an additional burden on other sub-regions/authorities who may not be willing to accommodate facilities from other regions without an evidence based apportionment exercise such as that carried out in the South East and East of England Regions with regards to London’s residual waste. It is only by setting out each sub–region’s requirements at a regional level that this issue can be identified and resolved. It is considered to be a fundamental function of regional policy to undertake this allocation. The North West Region is a large and varied Region with a pronounced elongate north- south axis. To provide a single list of key waste management facilities that are required for the whole region would provide little in the way of clear instruction or guidance for individual sub-regions/authorities.</p>		
Individual Response	Yes	<p>Option 2 is the better option because a sub-regional/ waste planning authority approach makes communities responsible for their own waste, encourages recycling and is a more flexible approach.</p>		
Halton Borough Council	Yes	<p>This option is most in keeping with current work to develop a sub-regional Joint Waste Development Plan Document for Greater Merseyside. In supporting this option we have concerns over how regional facilities will be dealt with. It is anticipated that some facilities, due to commercial requirements/costs in construction and operation, would need to serve the region to be economic.</p>		
The National Trust	Yes	<p>Generally this is the preferred approach as it should ensure that each sub-region/waste planning authority takes responsibility for the treatment of waste arising in its area (it is noted that for certain more specialised wastes it may not be appropriate/economic for</p>		

Organisation:	2.1. Do you agree with Waste Broad Locations Option 2?	2.1a. If so why?	2.1b. If not, why not?	2.1c. Please explain your answer to the previous question.
		them to be treated in the same sub-region, and in some instances treatment outside the Region will be necessary/appropriate; however, for the vast majority of the commercial, industrial and domestic waste arisings it is appropriate for it to be treated comparatively locally).		
Cumbria County Council	No	See previous comment. I am not convinced that the RSS has the evidence base to identify broad locations at the sub-regional level. This is what Development Frameworks do.		
Sefton Metropolitan Borough Council	Yes	The initial view is that the second option provides potentially the closest fit with the emerging Joint Waste Development Plan Document currently in preparation by the Merseyside authorities. The main concern is that the evidence-base used for the RSS projections and apportionments, and the locational criteria, should be consistent with extensive work undertaken for the Waste DPD. Close liaison with the Regional Assembly on this will be essential.		
South Lakeland District Council Development Plans Team	Yes	This option would provide a 15-year projection of waste arising (until 2026) and would identify the number and types of facilities required for each sub-region. In essence this would examine the potential for sub-regions to provide for waste management facilities that address the waste arising within each sub region. We support this option on the basis that it conforms with the self sufficiency principle (which argues that each sub region should rely on its own waste management capacity rather than export waste elsewhere) and the proximity principle (which requires for the treatment and disposal of waste should be sited as close to the source of the waste as possible. A sub regional option would also have benefit in terms of implementation – and could directly relate to targets in the Cumbrian LAA, and the Cumbria Minerals and Waste Local Development Framework. However, the target should take a regional perspective and be flexible enough to allow for a small number of proposals to manage waste from outside the sub-region where it can be demonstrated that the local, social and economic benefits outweigh other sustainability criteria. It should also take account of the fact that although net self-sufficiency in waste management is broadly desirable, it may not always be the case – dependent on the existing availability of waste management facilities and the catchment areas that they serve. For example, a facility could be located just across the Cumbrian border, and therefore we wouldn't		

<b>Organisation:</b>	<b>2.1. Do you agree with Waste Broad Locations Option 2?</b>	<b>2.1a. If so why?</b>	<b>2.1b. If not, why not?</b>	<b>2.1c. Please explain your answer to the previous question.</b>
		want an approach that advocated further facilities within our sub region in a location served by existing facilities that are easily accessible just outside the region.		
The Ramblers Association, Manchester and High Peak Area	Yes	We think that the 15 year time horizon is more realistic than the 20 year period suggested in Option 3. Not only are the ways waste is dealt with evolving rapidly, but also the population increase due to immigration is hard to assess over a longer period than 15 years ( and indeed may need assessing sooner). Also, the location of the proposed eco-towns will affect the need for waste facilities. We prefer a sub-regional approach, encouraging new primary residual waste treatment capacity to be located within the waste Planning Authority area in which the waste arises, whilst recognising that secondary treatments will probably have to be located on a regional basis.		
Joint advisory Committee for Strategic Planning	In part	The description of the approach explains that the output would comprise (bullets 3,4 and 5): An amount (apportionment) to plan for in each sub-region; translated to a number and type of facilities for the sub-region; and then suitable locations for facilities in each sub-region. This would seem to totally disregard the critical output of any such approach, which is to reconcile the capacity gaps that will exist across sub-regions with opportunities and preferred locations for meeting those cross-boundary deficiencies. The proper approach would seem to be a combination of options 1 and 2 , that is, to identify those capacity gaps at the sub-regional level, but then to analyse the regional significance of those gaps and whether these translate to a need for regional (and national) scale facilities (for reasons of economic scale, specialist treatments etc.) to be identified at the regional level.		
Sustainable Neighbourhoods Pool Manchester	Yes	Waste production is a local issues. Local Authorities should be guiding its citizens to reduce the amount of waste produced. Too little emphasis is placed on waste reduction and too much is placed on recycling. High levels of recycling reflect a failure of society to be responsible about the products they buy and especially its associated packaging. It is unfair and unjust for Local Authorities in one particular sub-region, which fail to manage waste production in their area to off load that waste into neighbouring sub-regions. Sub-regional waste transports is unnecessary and damaging to the environment and avoidable with intelligent product purchasing. Joined up waste management solutions and use of "energy from waste" industries should be common place as seen in Denmark and Germany where such industry is helping to improve the		

Organisation:	2.1. Do you agree with Waste Broad Locations Option 2?	2.1a. If so why?	2.1b. If not, why not?	2.1c. Please explain your answer to the previous question.
		local economy. Sub-regions should be as far as possible, self-sufficient in its waste disposal.		
Cheshire West and Chester (comments represent informal officer views)	Yes	There should be a very strong emphasis on achieving sub-regional self-sufficiency to minimise the unsustainable movement of waste • This will also encourage communities to take responsibilities for their own waste management • we are concerned about the inadequacy of evidence base – the Jacobs C&I figures are flawed. This needs to be addressed immediately.		
Macclesfield Borough Council	No	Although the difficulties with predicting waste arisings over a longer time period are understood, the very long planning and construction timescale associated with waste facilities means that it would be preferable to take the longest-term view possible when planning for waste.		
Haslington Parish Council	In part	Takes better account of proximity issues of waste generation and disposal close to source.		
Merseyside Policy Unit	In part	This option is most in keeping with current work in Merseyside to develop a sub-regional Waste Development Plan Document. The first relies too much on the imposition of a top-down approach, while the third takes predictions further ahead than we would be comfortable with. We are not comfortable that the evidence base should be taken as a given, and feel that a review of this should be linked to the proposed second study on regional facility locations.		
Stockport Metropolitan Borough Council	Yes	Stockport Council supports the submission made by AGMA and has a number of additional comments.		
North West Environment Link	Yes	Section 4 on Sustainability Appraisal etc, lays down that, “when considering options...the principle priority should be the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste”. The sub-regional approach best accommodates this principle in that it will encourage communities to take more responsibility for their waste, in accordance with PPS10 (being unable to export their waste should encourage minimisation and recycling) and will reduce the harmful environmental impacts of transporting waste across the region. The sub-regional approach should also reduce		

Organisation:	2.1. Do you agree with Waste Broad Locations Option 2?	2.1a. If so why?	2.1b. If not, why not?	2.1c. Please explain your answer to the previous question.
		the need to develop 'regionally-significant' waste treatment plants. The problem with such large plants, and thermal treatment plants in particular, is that they become locked into a commercial imperative which demands a centralised system guaranteeing a constant and continuous supply of waste to ensure their economic operation. NWEL believe that this system discourages waste minimisation and thus distorts the waste hierarchy in contradiction to both the Waste Strategy for England and RSS Policy EM11.		
Liverpool City Council	Yes	Option 2 is most in keeping with current work to develop a Merseyside Waste Development Plan Document.		
Ribble valley bc	Yes	The approach would be more likely in this Councils view to enable matters to be dealt with at a spatial level more readily suited to protecting the local area		
Emery Planning Partnership	In part	We consider that a sub regional approach is appropriate as this will ensure the necessary facilities in locations which are close to the sources of waste. This would result in shorter journey times from where the waste is generated to where it can be recycled. We consider that a longer term period is appropriate which is why we support Option 3.		
Carlisle City Council	Yes	This option would at least address issues on a sub-regional basis and minimise distance to deal with any waste arisings		
Lancashire County Council	In part	The description of the approach explains that the output would comprise (bullets 3, 4 and 5): § an amount (apportionment) to plan for in each sub-region; § translated to a number and type of facilities for the sub-region; § and then suitable locations for facilities in each sub-region. This would seem to totally disregard the critical output of any such approach, which is to reconcile the capacity gaps that will exist across sub-regions with opportunities and preferred locations for meeting those cross-boundary deficiencies. The proper approach would seem to be a combination of Options 1 and 2, that is, to identify those capacity gaps at the sub-regional level, but then to analyse the regional significance of those gaps and whether these translate to a need for regional (and national) scale facilities (for reasons of economies of scale, specialist treatments etc) to be identified at the regional level. It does appear that this and Option 1 confuse the critical consideration for the RSS at this time, that is, in the view of the Authorities, to identify broad locations within the region for significant scale		

Organisation:	2.1. Do you agree with Waste Broad Locations Option 2?	2.1a. If so why?	2.1b. If not, why not?	2.1c. Please explain your answer to the previous question.
		<p>facilities to manage cross-boundary waste arisings, building upon an appreciation and analysis of the 'gaps' in capacity that can be identified at the sub-regional planning level. For that reason no one option is preferred and instead the response below seeks to identify those elements of each that together would be supported, and could readily be combined to generate a robust, coherent, and deliverable policy framework for the provision of necessary waste management capacity across the region at the waste planning authority level. The approach under all options to "use the figures for waste arisings to 2020...that will feature in the final published RSS... are an agreed given" mistakenly assumes that those figures represent the output of a robust prediction model. In truth, it is the Authorities' understanding that the figure is a simple presentation of the reported waste arisings at a recent survey date. It may be that these also present of prediction under zero growth but that has to be specified through the approach.</p>		
Chorley Council	Yes	The RSS Partial Review should take into account the Lancashire Minerals and Waste Development Framework		
AGMA (the Association of Greater Manchester Authorities)	Yes	AGMA's preference would be for Option 2 since this appears to provide sufficient clarity on the number and type of facilities required in Greater Manchester and the rest of the North West, and the proposed timescale would be in line with GM's current baseline data and would not require further work to extend this information to a longer time period.		
MJM Strategies Ltd	In part	There will need to be flexibility in the approach to cover faculties owned and operated that cross sub regions. The economics of the land and the markets for the recovered materials will also need to be considered. The economics of plants may require regional or intra regional markets and not dependant and arisings within a sub region.		
Wirral MBC	Yes	Option 2 would better support work that has already been undertaken by the Merseyside authorities to identify potential needs and locations at subregional level. A sub-regional approach, which would be more likely to better promote the consideration of local opportunities for management closer to source, also appears to be supported by the accompanying sustainability appraisal.		

<b>Organisation:</b>	<b>2.1. Do you agree with Waste Broad Locations Option 2?</b>	<b>2.1a. If so why?</b>	<b>2.1b. If not, why not?</b>	<b>2.1c. Please explain your answer to the previous question.</b>
Chester City Council	In part	See previous comments The Council supports the principle of 'reducing' waste as advocated in the waste hierarchy in national, regional and local policy. The Council believes that regional scale facilities could result in the importing and transportation of waste between regions in order to maintain the longevity of the facility. This would breach the 'proximity principle'. Regional scale developments – being concentrated in one location - also raise concerns over the potential impact on traffic, landscape, nature conservation and air quality.		
CPRE North West	In part	This option is the best fit with the aims and objectives of PPS10; in particular in comparison with Option 1 it would better “provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities;” and “enable waste to be disposed of in one of the nearest appropriate installations” (PPS10 para 3). It would also be more consistent with: <ul style="list-style-type: none"> <li>o EM13, which states that at least primary treatment of waste should take place near to the source of arisings,</li> <li>o the requirement in EM10 to reduce harm to the environment, including reducing climate change impacts,</li> <li>o the general requirement of DP5 to reduce the need to travel and manage travel demand, and</li> <li>o the requirement of DP9 to reduce carbon emissions.</li> </ul> All these considerations point a priori to the treatment of waste near to the source of its’ arisings wherever possible, ie a primarily sub-regional rather than regional approach. There may in individual cases be reasons why this is not the most sustainable option, but this should be the basis of policy. Caution should be exercised with regard to identifying the type and number of facilities required. The RSS Panel Report recommended that the tables of waste arisings in RSS were simplified to indicate only the amount of waste to be treated, and the amount of residual waste requiring landfilling. They made this recommendation in response to arguments that being overly prescriptive about the type of treatment required could prevent the waste hierarchy being implemented, ie waste treatment being driven up the hierarchy and all waste being treated at as high a level in the hierarchy as possible (eg paras 8.79 & 8.86-87, in particular para 8.87 “The objective should be to move waste management up the hierarchy as far as possible”). Identifying the precise type and number of facilities believed to be required at present could have the same effect, ie preventing waste management being driven up the hierarchy in future. There should also be considerable caution about developing plans		

<b>Organisation:</b>	<b>2.1. Do you agree with Waste Broad Locations Option 2?</b>	<b>2.1a. If so why?</b>	<b>2.1b. If not, why not?</b>	<b>2.1c. Please explain your answer to the previous question.</b>
		<p>for “regionally-significant”, ie large scale, thermal treatment plants in particular. The very large capacity and inflexibility of processes of such plants would demand a constant and continuous supply of waste to ensure efficient and economic operation. This would lock the region into a centralised system which would tend to work against waste minimisation and driving the treatment of waste further up the hierarchy, in direct contradiction of the Waste Strategy for England and RSS policy EM11. There should be a general presumption in favour of a more decentralised pattern of waste management facilities wherever possible, as being more effective at driving waste up the hierarchy and reducing the need to travel. This presumption should only be overturned where there are clear and long-lasting sustainability benefits to be gained from larger installations. Due to the high levels of uncertainty about future waste arisings and management techniques, it would be unwise to attempt to predict arisings and requirements for treatment beyond 2026.</p>		
Environment Agency	In part	<p>Similarly to option 1, a purely sub-regional approach will be unlikely to be appropriate or even achievable. Firstly, there will be certain waste streams where for commercial and other reasons it will be more appropriate to manage these at a regional (or even national) scale. Secondly, waste management is a commercial activity. If someone wants to transport waste outside the sub-region it arose from (or even into or out of a region itself) and pay for its disposal/treatment at a facility with capacity, they can. What is needed is likely to be a blend of options 1 &amp; 2, possibly with consideration of the need for national scale facilities. This is our understanding of what is required in PPS10. RSS policy EM13 also reflects this by suggesting Municipal &amp; C&amp;I waste is expected to be managed more sub-regionally, that there is the possible need for regional scale facility in the Mersey Belt and that national scale facilities may be appropriate in the region where they offer a particularly advantage. In terms of the identification of numbers, types and broad locations , we would expect an option to be taken forward which sets out the required suite of facilities needed to most sustainably manage waste in the NW for the next 15 years.</p>		
Biffa Waste Services Ltd	No	Should be a 20 year period		

## 2.2. What other policy changes are required to RSS to deliver this option and why?

The table below shows the verbatim comments received. We have removed 27 blank responses.

Organisation:	2.2. What other policy changes are required to RSS to deliver this option and why?
The National Trust	Not possible to comment in the absence of the necessary evidence, i.e. first and foremost the final Table 9.3 in RSS, and also the Jacobs report. Given the report was produced over 6 months ago but is not currently available it suggests that there should be an opportunity to comment upon this part of the evidence base prior to RSS Partial Review proposals being put forward (or if it is abandoned altogether for an alternative evidence base to be produced and consulted upon).
Joint advisory Committee for Strategic Planning	There is a need to acknowledge the potential for regional ( and national) scale waste management facilities to occupy regional identified employment opportunities, particularly so given the scale and composition of waste facilities and waste park (resource recovery) formats. this linkage between these policy areas could usefully be expressly recognised through the broad locations' approach. Section 2 The express recognition given to the Joint Lancashire Minerals and Waste Development Framework, alongside other development plans/plan documents, is very much welcomed. As you will be aware, the Authorities are at the most advanced stage of all North West Waste Planning Authorities in the preparation of a Core Strategy. It is anticipated that adoption could occur as soon as February 2009. Similar consideration must also be given to the strategies and commitments of Waste Disposal Authorities across the North West for managing municipal waste. These programmes for delivering long-term municipal waste management capacity are at very advanced stages (for Lancashire and Blackpool facilities are already under construction and will be operational from 2010) and will render regional consideration of this waste stream largely meaningless.
Stockport Metropolitan Borough Council	There is a need for RSS to emphasise the need for new housing and other development to carefully consider design issues around sustainable waste management, promoting liaison between planners and waste management colleagues. Some new developments are poorly designed for both storage of and collection of recyclable storage of waste - e.g. insufficient clearance for waste wagons to operate, parking spaces in front of waste bin storage areas impeding collection, poor location and sizing of bins for access and management by residents, insufficient lighting in storage areas for residents. These issues should be checked as they could result in the inability to achieve targets set at a national level as well as our own regional targets for recycling etc. Links to other regional strategies - the RES should be mentioned with consideration of the potential for business development around waste management within the region and the funding of programmes to ensure achievement of commercial targets in terms of waste. Also the potential for job creation if establishing domestic and/or commercial recycling developments in sub-regions as well as their potential environmental and social impacts.

<b>Organisation:</b>	<b>2.2. What other policy changes are required to RSS to deliver this option and why?</b>
North West Environment Link	Apart from the need to update EM10 and significantly amend EM13, already identified in the Options Paper, this option appears to fit with existing RSS policies (particularly DP5 on reducing the need to travel and DP9 on reducing carbon emissions).
Liverpool City Council	No comment
Lancashire County Council	There is a need to acknowledge the potential for regional (and national) scale waste management facilities to occupy regional identified employment opportunities, particularly so given the scale and composition of waste facilities and waste park (resource recovery park) formats. This linkage between these policy areas could usefully be expressly recognised through the broad locations' approach.
RPS	The RSS needs to provide a policy framework that achieves greater inter-relationship between spatial issues and related policy objectives. In particular in making provision for strategic waste management and capacity for communities to manage waste close to where it arises, combined with the consideration of planned growth areas/points within the region, measures for mitigation of and adaptation to climate change as well as opportunities for securing renewable energy supply. In accordance with Paragraph 13 of Planning Policy Statement: Planning and CLimate Change, policy within the RSS should include scope for securing decentralised energy supply systems especially from renewable or low carbon energy sources which include energy from waste facilities. RSS should acknowledge energy from waste facilities as a significant renewable energy supply especially where opportunities exist to supply exisitng or potentially nearby energy users and planned growth areas. The integration of policy objectives indicated above is consistent with national guidance for waste management, energy and climate change strategies. In addition, in planning for future growth RSS should include provision within policy that recognises the potential role of the Green Belt in meeting the particular locational needs of some types of waste management facilities. This is recognised within the key planning objectives of PPS10: Planning for Sustainable Waste Management with Particular reference to:- "Protecting Green Belts but recognizing the particular location needs of some types of waste management facilities when defining green belt bouariess..."
AGMA (the Association of Greater Manchester Authorities)	It is not clear at this stage what other changes may be required and what the implications of the options are (section 2.3 which follows) since the evidence underpinning the consultation is not yet available.
CPRE North West	This option fits better with existing RSS policy than the alternatives.
Environment Agency	Similarly to Option 1, as a minimum EM12 and 13 would need altering to reflect that this option only considered sub-regional scale facilities for managing waste generated within the sub-regions themselves.

## 2.3. In taking forward this option, what are the implications for:

The table below shows the verbatim comments received. We have removed 22 blank responses.

Organisation:	2.3. In taking forward this option, what are the implications for:
Individual	<b>A) Delivery:</b> 1.Large scale facilities are more likely to discourage recycling as the first stage in the treatment of waste and there is the problem of alternatives when large facilities break down.
	<b>B) Infrastructure provision?</b> In the past the need for landfill fhas been over-estimated. The situation is still changing because of landfill tax and the increase in scrap metal prices. There should not be a reliance on the accuracy of tables.
	<b>C) Community and social issues?</b> -
	<b>D) Environment?</b> Land with peat should be excluded from waste proposals
	<b>E) Economy?</b> -
The National Trust	Not possible to comment in the absence of the necessary evidence, i.e. first and foremost the final Table 9.3 in RSS, and also the Jacobs report. Given the report was produced over 6 months ago but is not currently available it suggests that there should be an opportunity to comment upon this part of the evidence base prior to RSS Partial Review proposals being put forward (or if it is abandoned altogether for an alternative evidence base to be produced and consulted upon).
The National Trust	<b>A) Delivery:</b> Not known without the evidence base.
	<b>B) Infrastructure provision?</b> Not known without the evidence base.
	<b>C) Community and social issues?</b> Not known without the evidence base.
	<b>D) Environment?</b> Not known without the evidence base.
	<b>E) Economy?</b> Not known without the evidence base.
The Ramblers Association, Manchester and High Peak Area	<b>A) Delivery:</b> -
	<b>B) Infrastructure provision?</b> Existing established sites will hopefully already have sustainable infrastructure (ie rail or water, with minimum distance of road transport) and expansion of these should be looked at prior to establishing new sites. Where it is necessary to establish new sites, proximity to rail, or possibly canal, would favour choice of these sites. Another important factor in location of sites is wheteher there is the possibility of locating secondary facilities nearby, thus minimising the need to create new infrastructure to transport waste between primary and

<b>Organisation:</b>	<b>2.3. In taking forward this option, what are the implications for:</b>
	secondary treatment facilities.
	<p><b>C) Community and social issues?</b> The facilities will need to be situated at a reasonable distance from residential properties to avoid odour nuisance. Also, measures need to be taken to avoid waste being blown outside the site. A buffer belt of trees would avoid intrusive visual impact. Facilities for rural areas obviously need to be built near the source of the arisings, but for urban areas where large amounts of waste are produced , eg Liverpool, Manchester, land on or near to industrial estates could be used, to minimise intrusion into greenfield sites and also to minimise the distance these large amounts of waste are transported.</p>
	<p><b>D) Environment?</b> Designated sites should be avoided. For all proposals, surveys for the pre-existing biological and botanical interest of the site should be carried out. If it is not possible to choose another site (should the proposed one prove to be of considerable biological/botanical interest) mitigation measures should be carried out. Extensive tree planting should be carried out on and around the site, so that the area is not downgraded in terms of its appeal to recreational walkers. Footpath diversion proposals, if necessary, should be put out for consultation early on in the decision-making process.</p>
	<b>E) Economy? -</b>
Joint advisory Committee for Strategic Planning	<p><b>A) Delivery:</b> Delivery is reliant on a private waste industry that is, perhaps for understandable reasons, investment-shy at the time. In that sense, the rationale to the approach to identifying broad locations recognises the economies of scale and necessary scale of markets, or catchments that will prompt delivery of facilities of this scale. It is noted that section 1 correctly flags up the need for effective cross-boundary working relationships to support the approach to identifying broad locations and delivering this through agreement at the sub-regional level. Representations were made by the Authorities to the submitted draft RSS on this matter, which sought to highlight the approach taken to securing cross-authority agreement, specifically a form of policy wording that was progressed through the earlier partial review on waste and it is understood through initial drafts of the more recent RSS review.</p>
	<p><b>B) Infrastructure provision?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
	<p><b>C) Community and social issues?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>

Organisation:	2.3. In taking forward this option, what are the implications for:
	<p><b>D) Environment?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
	<p><b>E) Economy?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
Sustainable Neighbourhoods Pool Manchester	<p><b>A) Delivery:</b> Large scale education by Local Authorities on how to reduce the amount of waste produced in households using the Reduce and Reuse method, and implementing the recycling and reclaiming strands of the hierarchy as a last resort. It is especially important that biodegradable waste be removed from landfill and specific collections of such waste should be delivered across each sub-region.</p>
	<p><b>B) Infrastructure provision?</b> -</p>
	<p><b>C) Community and social issues?</b> With an emphasis on personal responsibility, communities should be brought together to discuss how waste can be managed in their neighbourhoods. There are opportunities for large scale employment and community cohesion.</p>
	<p><b>D) Environment?</b> Reducing waste is far better environmentally than recycling waste and this is where the onus should be. Utilising waste to provide energy should be sought at every opportunity and the removal of biodegradable waste from landfill will help reduce the amount of methane released into the atmosphere.</p>
	<p><b>E) Economy?</b> Large scale employment from new sustainable waste treatment facilities have been seen in Germany and Denmark.</p>
Macclesfield Borough Council	<p><b>A) Delivery:</b> -</p>
	<p><b>B) Infrastructure provision?</b> -</p>
	<p><b>C) Community and social issues?</b> -</p>
	<p><b>D) Environment?</b> -</p>
	<p><b>E) Economy?</b> -</p>
Haslington Parish Council	<p><b>A) Delivery:</b> -</p>
	<p><b>B) Infrastructure provision?</b> -</p>
	<p><b>C) Community and social issues?</b> -</p>

<b>Organisation:</b>	<b>2.3. In taking forward this option, what are the implications for:</b>
	<b>D) Environment? -</b>
	<b>E) Economy? -</b>
North West Environment Link	<b>A) Delivery: -</b>
	<b>B) Infrastructure provision?</b> The sub-regional approach should minimise the need for new infrastructure provision and this would accord with RSS Policy Em13 which states that, " when considering proposals for waste management facilities (including additional landfill capacity) the ability of existing established sites to meet the needs of the region/sub-region should be fully explored" and if at all possible, used in preference to new sites.
	<b>C) Community and social issues?</b> Sub-regional treatment, requiring communities to take responsibility for their own waste will remove the option of ` exporting the problem' and thus promote a positive community approach to waste minimisation and recycling. This, in turn should engender local social enterprises.
	<b>D) Environment?</b> The sub-regional approach will, by definition, reduce the need for waste to be transported in large quantities across the region, and thus reduce the air pollution and carbon emissions which trans regional waste transportation inevitably causes.
	<b>E) Economy?</b> The financial penalties arising from the EC Landfill Directive is driving present, and will drive future waste management policies. It is driving the culture change from waste as a liability to be disposed of to waste as an economic asset to be exploited through reuse, recycling and as a source of energy.
Lancashire County Council	<b>A) Delivery:</b> Delivery is reliant on a private waste industry that is, perhaps for understandable reasons, investment-shy at this time. In that sense, the rationale to the approach to identifying broad locations recognises the economies of scale and necessary scale of markets or catchments that will prompt delivery of these scale of facilities. It is noted that Section 1 correctly flags up the need for effective cross-boundary working relationships to support the approach to identifying broad locations and delivering this through agreement at the sub-regional level. Representations were made by the Authorities to the submitted draft RSS on this matter, which sought to highlight the approach taken to securing cross-authority agreement, specifically a form of policy wording that was progressed through the earlier partial review on waste and it is understood through initial drafts of the more recent RSS review.
	<b>B) Infrastructure provision?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development

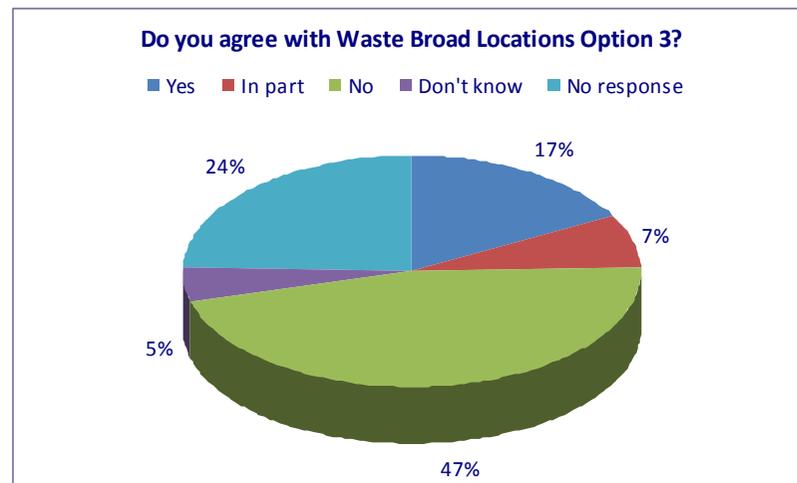
<b>Organisation:</b>	<b>2.3. In taking forward this option, what are the implications for:</b>
	<p>control processes.</p> <p><b>C) Community and social issues?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p> <p><b>D) Environment?</b> These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p> <p><b>E) Economy?</b> Please note comments under Delivery, in relation to economics of delivery. These are matters that are likely to be more appropriate to detailed location and site level considerations through subsequent sub-regional and development control processes.</p>
AGMA	<p><b>A) Delivery:</b> It is not clear at this stage what the implications of the options are since the evidence underpinning the consultation is not yet available. This applies to all categories a - e.</p> <p><b>B) Infrastructure provision?</b> -</p> <p><b>C) Community and social issues?</b> -</p> <p><b>D) Environment?</b> -</p> <p><b>E) Economy?</b> -</p>
CPRE North West	<p><b>A) Delivery:</b> -</p> <p><b>B) Infrastructure provision?</b> If waste treatment facilities are primarily considered on a sub-regional basis, the need for new infrastructure is likely to be less than if consideration is primarily regional.</p> <p><b>C) Community and social issues?</b> Sub-regional treatment, enabling communities to take more responsibility for their own waste, is likely to generate significantly less community opposition than the alternative. It is a more equitable and fairer approach, which will be more likely to raise public awareness of the practical need to minimise the generation of waste and to manage unavoidable arisings as high up the waste hierarchy as possible.</p> <p><b>D) Environment?</b> Focusing on treating waste close to the source of its arising will generally be more sustainable than taking a regional approach and is likely to reduce the need to travel and thus (by comparison) reduce carbon emissions and air pollution. The availability of sustainable means of transport should also be taken into account when considering locations for treatment</p>

<b>Organisation:</b>	<b>2.3. In taking forward this option, what are the implications for:</b>
	facilities.
	<b>E) Economy?</b> Economic considerations are likely to drive future waste management behaviour, eg the increasing cost of landfill and competitive advantage to be gained from eliminating waste generation or treating it at higher levels of the hierarchy.
Environment Agency	<b>A) Delivery:</b> The Environment Agency makes this point in relation to both option 1 and 2. Para 1.2 of the options paper highlights the need to consider the development of a mechanism for cross authority working to aid implementation/delivery on the ground. The Environment Agency would like further clarification on the need for such a mechanism and the role it would play as we currently do not perceive there to be a problem with the existing informal arrangements.
	<b>B) Infrastructure provision? -</b>
	<b>C) Community and social issues? -</b>
	<b>D) Environment?</b> There will be potentially be impacts from waste management facilities on the environment, regardless of their scale. At the level of setting out broad locations, environmental issues will need to be considered and should guide this process. However, site specific and local impacts will be hard to identify until sites are looked at within the broad locations and schemes themselves come forward. We would expect the normal planning process to address these issues through things like EIA or development control conditions (attached to any grant of permission to control impacts). The waste management licensing process will also address environmental issues.
	<b>E) Economy? -</b>

### 3.1. Do you agree with Waste Broad Locations Option 3?

When we asked this question people told us;

Do you agree with Waste Broad Locations Option 3?	
Yes	7
In part	3
No	20
Don't know	2
No response	10
<b>Total Responses</b>	<b>42</b>



The table below shows the verbatim comments received. We have removed 7 blank responses.

Organisation:	3.1. Do you agree with Waste Broad Locations Option 3?	3.1a. If so why?	3.1b. If not, why not?	3.1c. Please explain your answer to the previous question.
On behalf of WRG	In part	The problems of forecasting waste arisings are well understood due to the changes in growth rates that are affected by the wider economy as well as by waste minimisation initiatives. PPS 10 suggests, in paragraph 6, that the RSS should look forward for a 15 to 20 year period and that annual monitoring and five yearly capacity reviews should be carried out. Paragraph 10 of PPS 10 cautions against "spurious precision" which can equally apply to temporal forecasts as it can to detailed annual forecasts. Accordingly, Waste Recycling Group considers that the longer term forecasts are unlikely to carry significant weight in making investment or planning decisions and suggests that a 15 year horizon is adequate for plan making purposes.		
Countryside Properties.	Yes	National policy would require policies to cover the period to 2031. The NWRA believes that projecting beyond 2026 would be less reliable.		
Northwest Regional	Don't know	This is a technical issue and the Agency does not have the evidence with which to		

<b>Organisation:</b>	<b>3.1. Do you agree with Waste Broad Locations Option 3?</b>	<b>3.1a. If so why?</b>	<b>3.1b. If not, why not?</b>	<b>3.1c. Please explain your answer to the previous question.</b>
Development Agency		comment.		
Halton Borough Council	No	This option uses predictions further ahead than we are comfortable with.		
The National Trust	No	The confidence level associated with projections of arisings/recycling rates/reductions in packaging are such that beyond even 10-15 years it is doubtful how helpful forecasts will be, and they certainly will need to be re-visited regularly in the future. It is highly doubtful that there is much, if any, value to be gained from trying to predict the need for waste treatment facilities post 2026.		
Cumbria County Council	No	I think there are enough difficulties in projecting forward 15 years with the rapid pace of change in waste management.		
The Ramblers Association, Manchester and High Peak Area	No	The 20 year period is too long.		
Joint advisory Committee for Strategic Planning	No	For the reasons expressed above, that the timeframe of 15 years to 2026 would provide the better certainty for plan-making, particularly given the enormous uncertainties that surround planning for waste, in terms of its growth, its changing composition, the role and suitability of new and emerging technologies, the response of, and investment choices made by, waste industry, emerging reprocessing markets, and public perceptions etc.		
Sustainable Neighbourhoods Pool Manchester	Yes	Waste management is a long term issues and needs to be addressed on a long term timescale. There is no room for shortsightedness. While it is true that waste arising may be different in the future, waste will always be produced and will always need to be handled in the most sustainable and environmentally friendly manner possible. Option 3 will take the region well into the time when the current ceiling of the landfill escalator tax will have been reached and we should be aiming to provide solutions today for the problems of the future.		
Cheshire West and Chester (comments represent informal	No	With the inadequacy of the evidence base (the Jacobs C&I figures), it doesn't seem sensible to establish longer-term projections.		

<b>Organisation:</b>	<b>3.1. Do you agree with Waste Broad Locations Option 3?</b>	<b>3.1a. If so why?</b>	<b>3.1b. If not, why not?</b>	<b>3.1c. Please explain your answer to the previous question.</b>
officer views)				
Macclesfield Borough Council	Yes	Macclesfield Borough Council agrees with option 3(a), which takes a regional approach to apportionment of waste, identification of the number of facilities required and their broad locations, and provides projections for a 20-year period (until 2031). Although the difficulties with predicting waste arisings over a longer time period are understood, the very long planning and construction timescale associated with waste facilities means that it would be preferable to take the longest-term view possible when planning for waste. With the changing nature of waste creation and disposal, there is likely to be need for more specialist types of waste facilities. There may only be need for one particular type of facility in a region, and the development of certain facilities would depend on a critical mass in order that they become economically viable. A regional approach to planning for waste would therefore be more appropriate than a sub-regional approach.		
Haslington Parish Council	Don't know	Much of the overriding policy appears to be driven from Europe - too long a timescale to define policy.		
Merseyside Policy Unit	No	See our answer relating to Waste Option 2. This option (2) is most in keeping with current work in Merseyside to develop a sub-regional Waste Development Plan Document. The first relies too much on the imposition of a top-down approach, while the third takes predictions further ahead than we would be comfortable with. We are not comfortable that the evidence base should be taken as a given, and feel that a review of this should be linked to the proposed second study on regional facility locations.		
Stockport Metropolitan Borough Council	No			
North West Environment Link	No	On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026.		
Liverpool City Council	No	Option 3 takes predictions further ahead than Liverpool and its Merseyside partners		

Organisation:	3.1. Do you agree with Waste Broad Locations Option 3?	3.1a. If so why?	3.1b. If not, why not?	3.1c. Please explain your answer to the previous question.
		would be comfortable with.		
Ribble valley bc	No	Concerns that applying varied time scale approach would be more difficult to link with locational planning and as such this option was favoured less by members than Option 2.		
Emery Planning Partnership	Yes	We consider that a sub regional approach is appropriate as this will ensure the necessary facilities in locations which are close to the sources of waste. This would result in shorter journey times from where the waste is generated to where it can be recycled. We consider that a longer term period is appropriate as this will provide greater certainty to the local community as to the need and the broad locations for the facilities to be located. Our client ADS Recycling, has proposed a site to Halton Borough Council during their call for sites in December 2007 for a dedicated waste recycling plant. The site is bounded to the east by Cholmondeley Road, the Weaver Navigation Council to the south, the M56 to the east and the A557 / Weaver View to the north. The site was previously used as part of the ICI waste arena for the disposal and containment of hydrofluoride residuals. The survey work is ongoing on this site, however it is our client's intention to work with the council to remediate and reclaim the site and construct a dedicated reclamation park, which would provide for significant re-cycling of waste within the borough. The proposed uses can be seen from the submitted concept plan, setting out the various uses that could be brought forward on the site.		
Carlisle City Council	In part	Whether projections should run for a 20 year period is entirely dependent upon the reliability of information and forecasting/prediction of waste arisings. Inevitably it will be reviewed. The main consideration is what implications arise in the subsequent 5 years that will affect how waste arisings are dealt with over the 15 year period.		
Lancashire County Council	No	For the reasons expressed in response to Options 1 and 2, that the timeframe of 15 years to 2026 would provide the better certainty for plan-making, particularly given the considerable variables that surround planning for waste, in terms of its growth, its changing composition, the role and suitability of new and emerging technologies, the response of, and investment choices made by, the waste industry, emerging reprocessing markets, and public perceptions etc.		

<b>Organisation:</b>	<b>3.1. Do you agree with Waste Broad Locations Option 3?</b>	<b>3.1a. If so why?</b>	<b>3.1b. If not, why not?</b>	<b>3.1c. Please explain your answer to the previous question.</b>
Chorley Council	No			
AGMA (the Association of Greater Manchester Authorities)	No		See response to Option 2. AGMA's preference would be for Option 2 since this appears to provide sufficient clarity on the number and type of facilities required in Greater Manchester and the rest of the North West, and the proposed timescale would be in line with GM's current baseline data and would not require further work to extend this information to a longer time period.	
MJM Strategies Ltd	In part		The emerging technologies and producer responsibilities makes forecasting that far ahead difficult. IT is essential that some flexibility is provided and that delays in provision of facilities are inevitable.	
Wirral MBC	No		Projecting beyond 2026 would be less reliable given the current pace of change. Were Option 3 to be taken forward, contrary to the Council's wishes, a sub-regional approach would be preferred, for the reasons set out by the Council in support of Option 2 above.	
Congleton Borough Council	Yes		Although it is understood that predicting waste arising for a 20-year period leads to concerns with regard to the accuracy of the figures involved, consideration will need to be given to the local authorities that will have to plan for the facilities required by these predictions. In some cases the shorted timescale could lead to issues in relation to the time horizon it will be possible for these more local documents to consider. This is a particular issue in relation to waste facilities, which frequently suffer from long planning and construction timescales. Therefore Option 3 is supported. The scale of the approach is likely to be dependent on the nature of waste facilities. On the one hand waste facilities are a key element of the infrastructure required for the additional housing proposed by the Partial Review and may be required to provided in close proximity to the areas of development in order to provide a sustainable service, e.g. to reduce waste transportation by motor vehicles. On the other hand, where there are more specialist types of waste facilities, there may only be a need for one facility in the region, or the facilities would depend on a critical mass in order that they become economically viable, suggesting the need for a more Regional approach.	
Cheshire East Council	No			
Chester City Council	No		See previous comments The Council supports the principle of 'reducing' waste as	

Organisation:	3.1. Do you agree with Waste Broad Locations Option 3?	3.1a. If so why?	3.1b. If not, why not?	3.1c. Please explain your answer to the previous question.
		<p>advocated in the waste hierarchy in national, regional and local policy. The Council believes that regional scale facilities could result in the importing and transportation of waste between regions in order to maintain the longevity of the facility. This would breach the 'proximity principle'. Regional scale developments – being concentrated in one location - also raise concerns over the potential impact on traffic, landscape, nature conservation and air quality.</p>		
CPRE North West	No	<p>See answers to question 2 This option is the best fit with the aims and objectives of PPS10; in particular in comparison with Option 1 it would better “provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities;” and “enable waste to be disposed of in one of the nearest appropriate installations” (PPS10 para 3). It would also be more consistent with:</p> <ul style="list-style-type: none"> <li>o EM13, which states that at least primary treatment of waste should take place near to the source of arisings,</li> <li>o the requirement in EM10 to reduce harm to the environment, including reducing climate change impacts,</li> <li>o the general requirement of DP5 to reduce the need to travel and manage travel demand, and</li> <li>o the requirement of DP9 to reduce carbon emissions.</li> </ul> <p>All these considerations point a priori to the treatment of waste near to the source of its’ arisings wherever possible, ie a primarily sub-regional rather than regional approach. There may in individual cases be reasons why this is not the most sustainable option, but this should be the basis of policy. Caution should be exercised with regard to identifying the type and number of facilities required. The RSS Panel Report recommended one of the nearest appropriate installations” (PPS10 para 3). It would also be more consistent with:</p> <ul style="list-style-type: none"> <li>o EM13, which states that at least primary treatment of waste should take place near to the source of arisings,</li> <li>o the requirement in EM10 to reduce harm to the environment, including reducing climate change impacts,</li> <li>o the general requirement of DP5 to reduce the need to travel and manage travel demand, and</li> <li>o the requirement of DP9 to reduce carbon emissions.</li> </ul> <p>All these considerations point a priori to the treatment of waste near to the source of its’ arisings wherever possible, ie a primarily sub-regional rather than regional approach. There may in individual cases be reasons why this is not the most sustainable option, but this should be the basis of policy. Caution should be exercised with regard to identifying the type and number of facilities required. The RSS Panel</p>		

<b>Organisation:</b>	<b>3.1. Do you agree with Waste Broad Locations Option 3?</b>	<b>3.1a. If so why?</b>	<b>3.1b. If not, why not?</b>	<b>3.1c. Please explain your answer to the previous question.</b>
		<p>Report recommended that the tables of waste arisings in RSS were simplified to indicate only the amount of waste to be treated, and the amount of residual waste requiring landfilling. They made this recommendation in response to arguments that being overly prescriptive about the type of treatment required could prevent the waste hierarchy being implemented, ie waste treatment being driven up the hierarchy and all waste being treated at as high a level in the hierarchy as possible (eg paras 8.79 &amp; 8.86-87, in particular para 8.87 "The objective should be to move waste management up the hierarchy as far as possible"). Identifying the precise type and number of facilities believed to be required at present could have the same effect, ie preventing waste management being driven up the hierarchy in future. There should also be considerable caution about developing plans for "regionally-significant", ie large scale, thermal treatment plants in particular. The very large capacity and inflexibility of processes of such plants would demand a constant and continuous supply of waste to ensure efficient and economic operation. This would lock the region into a centralised system which would tend to work against waste minimisation and driving the treatment of waste further up the hierarchy, in direct contradiction of the Waste Strategy for England and RSS policy EM11. There should be a general presumption in favour of a more decentralised pattern of waste management facilities wherever possible, as being more effective at driving waste up the hierarchy and reducing the need to travel. This presumption should only be overturned where there are clear and long-lasting sustainability benefits to be gained from larger installations. Due to the high levels of uncertainty about future waste arisings and management techniques, it would be unwise to attempt to predict arisings and requirements for treatment beyond 2026.</p>		
Environment Agency	No	<p>RSS will be PPS10 compliant if it provides at least a 15 year time horizon. We agree with the statements on page 2 of the options paper and the uncertainty there is around the ability of models to accurately predict waste management requirements in the long term. As the paper correctly states, the accuracy of these models is questionable in the longer term due to changing ways waste is generated, the volume of waste, changing attitudes towards waste management (particularly viewing waste as a resource) and changes to potential technologies for its treatment, re-use and eventual disposal. As a result we feel an option which has a 20 year time horizon will not provide the accuracy needed to assist waste planning at a sub-regional and local level.</p>		

<b>Organisation:</b>	<b>3.1. Do you agree with Waste Broad Locations Option 3?</b>	<b>3.1a. If so why?</b>	<b>3.1b. If not, why not?</b>	<b>3.1c. Please explain your answer to the previous question.</b>
		We also feel that developing an option for 20 rather than 15 years is unnecessary as there will have been several opportunities to revisit waste policy by then (most immediate probably likely to be through the development of a Single Integrated Regional Strategy).		
Biffa Waste Services Ltd	Yes	20 years is the correct period. The options should be identified sub regionally.		

### 3.2. What other policy changes are required to RSS to deliver this option and why?

The table below shows the verbatim comments received. We have removed 34 blank responses.

<b>Organisation:</b>	<b>3.2. What other policy changes are required to RSS to deliver this option and why?</b>
The National Trust	No specific comments.
North West Environment Link	n/a see answer to 3.1 On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026.

### 3.3. In taking forward this option, what are the implications for:

The table below shows the verbatim comments received. We have removed 33 blank responses.

Organisation:	3.3. In taking forward this option, what are the implications for:
The National Trust	<b>A) Delivery:</b> No specific comments.
	<b>B) Infrastructure provision?</b> No specific comments.
	<b>C) Community and social issues?</b> No specific comments.
	<b>D) Environment?</b> No specific comments.
	<b>E) Economy?</b> No specific comments.
North West Environment Link	<b>A) Delivery:</b> n/a see answer to 3.1 On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026.
	<b>B) Infrastructure provision?</b> 1 On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026.
	<b>C) Community and social issues?</b> On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026.
	<b>D) Environment?</b> On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026
	<b>E) Economy?</b> On balance predicting and providing for a 15 year timescale seems more sensible than a 20 year one, though, with the rate of technological change and factors such as the potential impact of the region's housing aspirations, the plan may well have to be revisited before 2026
Emery Planning Partnership	<b>A) Delivery:</b> Our client ADS Recycling, has proposed a site to Halton Borough Council during their call for sites in December 2007 for a dedicated waste recycling plant. The site is bounded to the east by Cholmondeley Road, the Weaver Navigation Council to the south, the M56 to the east and the A557 / Weaver View to the north. The site was previously used as part of the ICI waste arena for the disposal and containment of hydrofluoride residuals. The survey work is ongoing on this site, however it is our client's intention to work with the council to remediate and reclaim the

<b>Organisation:</b>	<b>3.3. In taking forward this option, what are the implications for:</b>
	site and construct a dedicated reclamation park, which would provide for significant re-cycling of waste within the borough. The proposed uses can be seen from the submitted concept plan, setting out the various uses that could be brought forward on the site.
	<b>B) Infrastructure provision? -</b>
	<b>C) Community and social issues? -</b>
	<b>D) Environment? -</b>
	<b>E) Economy? -</b>

## 4. Other comments

Organisation	Other comments
Peel Environmental Ltd	<p><b>Introduction and Context</b></p> <p>Peel Environmental Limited (Peel) is a developer of waste projects with significant assets located in the Region.</p> <p>Peel owns a number of key waste management facilities in the Region, including the Arpley Landfill Site, and is developing business parks to accommodate the new built infrastructure required to make the shift from traditional waste management practices to more sustainable solutions. Examples include Partington Wharfside, where plans have recently been announced by the Spanish firm, SAICA, to develop a £200 million Recycled Paper Mill and the Ince Resource Recovery Park proposals for a modern, clean industrial park that is focused on the reprocessing and remanufacturing of waste materials.</p> <p><b>Waste Management in the North West</b></p> <p>Whilst the policies contained within the Secretary of State’s Proposed Changes to RSS provide a robust background to policy development, they are not PPS10 compliant, as is acknowledged by the NWRA, in two areas – statistical background and broad locations.</p> <p>The statistical basis of RSS is important, but it needs to be recognised that this will never be perfect. The level of understanding of commercial, industrial and construction, demolition and excavation waste arising is generally not robust, but the position in the North West is probably better than in most other regions.</p> <p>It is believed that the currently available statistical information provides an appropriate basis for developing policy within this Partial Review.</p> <p>As was highlighted at the recent Ince Marshes Public Inquiry, and now acknowledged by the NWRA, the Jacobs Study on the broad location of waste management facilities contained some</p>

fundamental errors and provided no meaningful basis for policy development. It is understood that the NWRA intends to commission further work on establishing broad locations and it is assumed that further consultation will be undertaken in due course. Peel would welcome an early involvement in this Study.

It is important to note that a significant level of waste management capacity will actually be delivered through the operation of EM17, as renewable energy. Absolute clarity on this should be provided in a reformulated EM13. The Broad Location of energy from waste facilities will be addressed in the Broad Location Study for renewable energy. The broad location for waste management facilities will therefore address strategic waste treatment and secondary reprocessing development.

It is acknowledged that both PPS10 and SoS's Proposed Changes to RSS encourage Local Authorities to work together in identifying appropriate sites for the location of regionally significant facilities. However, in formulating policy that will provide for the delivery of regional scale development, this should not be dependant on this joint working having been established.

# Appendix One - Waste Options Paper

Draft

# **RSS Partial Review – Broad Locations for Waste Management Facilities**

## **Section 1: Issues to be addressed**

What are the key issues that need to be considered for the Partial Review?

### **1.1 Issues within the topic area**

The Partial Review will predict future waste arisings for the various waste streams and apportion by waste planning authority area or sub-region where appropriate, using recently updated evidence. There is considerable debate underway about the findings from the broad locations for waste management facilities study<sup>1</sup> produced for the Assembly last year which is intended to provide the evidence base for the Partial Review. Moreover, an important matter that is currently being discussed amongst regional and sub-regional organisations are figures for commercial and industrial waste arisings featured in Table 9.3 of the proposed changes to RSS. It has come to the recent attention of the Assembly that the data presented originally to the Government Office regarding the Assembly's 2006/07 Commercial and Industrial Survey contained errors. The information within Table 9.3 therefore requires amendment which is currently subject to discussion between the parties concerned. Assembly officers consider it is critical that agreement is reached on the evidence base for waste issues to ensure that the Partial Review concentrates on the key matter of determining broad locations for waste management facilities. As a result it is intended that the waste arisings figures that feature in the final published RSS, expected later this year, will be taken as a given for waste policy development in the Partial Review.

PPS10 notes that these figures should provide a 15 to 20 year projection, meaning predictions and associated policy should consider the period up until 2031. At present, there is some ambiguity concerning the models used to predict future waste arisings. Their accuracy is questioned due to the changing ways in which waste is created and dealt with. It is considered that projecting waste arising to 2026 (i.e. the 15 year time horizon) might prove more accurate and robust. The predicted waste arisings will be used, alongside national government policy on reducing and managing waste, to identify the number and types of facilities required up until at least 2026 and the broad location for their accommodation will be shown. Further work on localities within the broad

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<sup>1</sup> Identification of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities in the North West, Jacobs for NWRA (October 2007)

locations is to be undertaken where necessary at District level (see Section 2 and sub-regional issues).

A related issue that merits further consideration as part of the implementation of the Partial Review is the development of a mechanism for cross authority working on waste apportionment and treatment issues. Currently, informal working relationships exist between adjacent areas and there would be benefit derived in developing a regional implementation framework that could support these relationships.

## **1.2 Links with other policy areas and any cross-cutting themes that should be considered.**

### Links with other policy areas being reviewed in the Partial Review

There are direct links with the review of housing issues and renewable energy that are set out in the Partial Review. There are direct consequences for waste management requirements that will occur as a result of any significant uplift in housing figures that may emerge from the Partial Review. Ongoing discussions are taking place with the Regional Technical Advisory Body (RTAB) that provides the Assembly with advice on waste issues to consider the implications of future housing growth.

In terms of the renewable energy matters, there are links with the potential contribution from energy from waste as part of the renewable energy mix. The current draft RSS includes indicative targets (see Table 9.6 in the Proposed Changes to RSS (March 2008)) for the contribution from energy from waste schemes.

### Links to cross cutting themes which are the key spatial principles set out in the Panel Report (i.e. policies DP1 to DP8)

- DP1: Spatial Principles in particular, the need to promote sustainable communities; make the best use of existing resources and infrastructure; promote environmental quality; and reduce emissions and adapt to climate change.
- DP2: Promote Sustainable Communities through fostering sustainable relationships between homes, workplaces and other concentrations of regularly used services and facilities and taking into account the economic, environmental, social and cultural implications of development and spatial investment decisions on communities.

### Links to other regional strategies.

There is a need to consider the cross border movement of waste to and from neighbouring regions (Scotland, Wales, North East, Yorkshire and Humber, East Midlands and West Midlands).

## Section 2: What has been decided

What parts of the policy/policies do we propose to keep unchanged in the Partial Review?

Currently we have developed policy based options that do not include detail on the potential requirement for waste management facilities. There is considerable debate underway about the findings from the broad locations for waste management facilities study produced for the Assembly last year which is intended to provide the evidence base for the Partial Review. Moreover, an important matter that is currently being discussed amongst regional and sub-regional organisations are figures for commercial and industrial waste arisings featured in Table 9.3 of the proposed changes to RSS. It has come to the recent attention of the Assembly that the data presented originally to the Government Office regarding the Assembly's 2006/07 Commercial and Industrial Survey contained errors. The information within Table 9.3 therefore requires amendment which is currently subject to discussion between the parties concerned. Assembly officers consider it is critical that agreement is reached on the evidence base for waste issues to ensure that the Partial Review concentrates on the key matter of determining broad locations for waste management facilities. As a result it is intended that the waste arisings figures that feature in the final published RSS, expected later this year, will be taken as a given for waste policy development in the Partial Review.

In terms of current RSS policy (as amended by proposed changes), it is anticipated that the following changes are likely:

- EM10: A Regional Approach to Waste Management will need to be updated to reflect the new time scales and associated targets.
- EM11: Waste Management Principle will remain unchanged.
- EM12: Locational Principles will remain unchanged.
- EM13: Provision of Nationally, Regionally and Sub-Regionally Significant Waste Management Facilities will need significant amendment.

Any national, other regional or sub-regional issues where decisions have been taken or are expected soon that need to be flagged up in the options consultation?

England's Waste Strategy 2007 (WS2007) provides a number of updated targets to be taken into consideration as many are different from those found in the Regional Waste Strategy (RWS).

The RWS has one target (55% household recycling or composting by 2020) that exceeds the WS2007 and three targets that do not exist at the national level regarding commercial and industrial waste (recycling, growth and recovery). The Government has two targets (40% household recycling or composting and 53% recovery of the value by

2010) that exceed the RWS. In addition, the Government has four targets that do not exist at the regional level (household waste reduction 29% by 2010, 35% by 2015 and 45% by 2020 and recovery 75% of the value from municipal waste by 2020). Finally, the Government has an expectation that does not exist at the regional level for commercial and industrial waste to be reduced by 20% by 2010 based on 2004 levels.

Most notably, the RWS sets targets for preventing and managing commercial and industrial waste, which are missing from the national strategy. However, the regional strategy does not have any targets for preventing and managing household residual waste nor for reducing greenhouse gas emissions, which have been set at the national level. However, the region is currently developing regional greenhouse gas emissions reduction targets as part of the North West Climate Change Action Plan.

### Sub-regional issues

There are six sub-regional waste planning documents that need to be accounted for in the development of the regional policy framework. In turn the sub-regional frameworks are required to be in 'general conformity' with RSS<sup>2</sup>. Table 1 sets out the latest state of play with regard to the six development frameworks being undertaken at the sub-regional level.

**Table 1: Waste Development Plan Document Progress**

Sub-Region: Plan	Current Stage for Local Development Framework	Contact Information
<b>Cheshire:</b> Replacement Waste Local Plan	Adopted July 2007	<a href="http://www.cheshire.gov.uk/Planning/WasteLocalPlan">http://www.cheshire.gov.uk/Planning/WasteLocalPlan</a>
<b>Cumbria:</b> Minerals and Waste Development Framework	Submitted to Secretary of State March 2008. Consultation until end of May 2008	<a href="http://www.cumbria.gov.uk/planning-environment/planning/policy/minerals_waste/mwdf/mwdevframe.asp">http://www.cumbria.gov.uk/planning-environment/planning/policy/minerals_waste/mwdf/mwdevframe.asp</a>
<b>Greater Manchester:</b> Waste Development Plan Document	Stage 2 Issues and Options consultation to be undertaken in summer 2008	<a href="http://www.gmwastedpd.co.uk/">http://www.gmwastedpd.co.uk/</a>
<b>Lancashire (including Blackpool and Blackburn with Darwen):</b> Minerals and Waste Development Framework	Independent Examination at the end of May 2008	<a href="http://www.lancashire.gov.uk/environment/lmwlp/lancsmwdf/index.asp">http://www.lancashire.gov.uk/environment/lmwlp/lancsmwdf/index.asp</a>
<b>Merseyside (including Halton):</b> Waste Development Plan Document	Preferred Options consultation expected in autumn 2008	<a href="http://www.wasteplanningmerseyside.gov.uk/site.do?id=4">http://www.wasteplanningmerseyside.gov.uk/site.do?id=4</a>
<b>Warrington:</b> Waste Development Plan Document	Undertaking initial stages of work to prepare a Waste Development Plan Document	<a href="http://www.warrington.gov.uk/Environmentandplanning/Local_Development_Framework/">http://www.warrington.gov.uk/Environmentandplanning/Local_Development_Framework/</a>

<sup>2</sup> See Planning Policy Statement 12 – Local Development Frameworks, Office for the Deputy Prime Minister (2004)

## Section 3: Options for Consultation

What are the options that need to be consulted upon in the Partial Review?

### Option 1: Regional Approach

This option would provide a 15 year projection of waste arisings (until 2026) and identifies at a regional level the number and types of regional scale facilities required. It would also provide for a regional picture of the broad location of such facilities. In essence, this option would set out an approach for regional scale facilities that would be of sufficient scale to manage waste arisings from across the region. In summary this approach will;

- use the figures for waste arisings to 2020 (Table 9.3) that will feature in the final published RSS (expected in summer 2008) as an agreed given;
- predict future waste arisings until 2026;
- apportion waste arisings by sub-region/waste planning authority area;
- identify the number and types of regional scale facilities required by the region; and
- identify the broad locations for such facilities.

The Questions

#### Question 1

1.1. Do you agree with the above option?

Yes (go to 1a)

No (go to 1b)

1.1a. If so why?

1.1b. If not, why not?

1.2. What other policy changes are required to RSS to deliver this option and why?

1.3. In taking forward this option, what are the implications for:

- A) Delivery?
- B) Infrastructure provision?
- C) Community and social issues?
- D) Environment?
- E) Economy?

## Option 2: Sub-Regional Approach

This option would provide a 15 year projection of waste arisings (until 2026) and would identify the number and types of facilities required for each sub-region (Cumbria, Lancashire, Greater Manchester, Merseyside and Cheshire). In essence this would be examining the potential for sub-regions to provide for waste management facilities that address the waste arisings within each sub-region. It will also provide a sub-regional picture of the broad locations for such facilities. In summary this approach will;

- use the figures for waste arisings to 2020 (Table 9.3) that will feature in the final published RSS (expected in summer 2008) as an agreed given;
- predict future waste arisings until 2026;
- apportion by sub-region/ waste planning authority area;
- identify the number and types of facilities required by each sub-region; and
- identify the broad locations for such facilities within each sub-region.

### The Questions

#### Question 2

2.1. Do you agree with the above option?

Yes (go to 1a)

No (go to 1b)

2.1a. If so why?

2.1b. If not, why not?

2.2. What other policy changes are required to RSS to deliver this option and why?

2.3. In taking forward this option, what are the implications for:

- A) Delivery?
- B) Infrastructure provision?
- C) Community and social issues?
- D) Environment?
- E) Economy?

## Option 3: Varied Time Scale

This option would take either a Regional or Sub-Regional approach to apportionment of waste, identification of the number of facilities required and their broad locations as discussed in options 1 and 2 above, however it would provide projections for a 20 year period (until 2031) rather than a 15 year period (until 2026).

## The Questions

### **Question 3**

3.1. Do you agree with the above option?

Yes (go to 1a)

No (go to 1b)

3.1a. If so why?

3.1b. If not, why not?

3.2. What other policy changes are required to RSS to deliver this option and why?

3.3. In taking forward this option, what are the implications for:

A) Delivery?

B) Infrastructure provision?

C) Community and social issues?

D) Environment?

E) Economy?

## **Section 4: Sustainability Appraisal/ Habitats Regulations Assessment/ Equalities Impact Assessment/ Health Impact Assessment/ Rural Proofing considerations**

The waste management options should:

- Reduce waste generation and improve resource efficiency;
- Minimise waste; and
- Increase re-use, recycling and recovery.

The region therefore faces several key challenges:

- The NW generates the highest amount of household waste, is the second largest generator of industrial waste and the third largest generator of commercial waste in England.
- The NW presently exports the majority of its waste to landfills outside of the region.
- Levels of recycling are improving but are still half of those in other parts of the country.

Locational options for waste management facilities are key in the Partial Review. Performance across the region is not constant and certain geographical areas may perform better or worse than the regional average.

In light of these issues, when generating options for waste the principle priority should be the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste.

In doing so the Partial Review will need to take consider specific aspects of the following documents.

<p><b>PPS9: Biodiversity and Geological Conservation (August 2005)</b></p>	<p>The increased spatial scope of the Partial Review means that there will be increased accuracy as to where impacts will be felt for waste, renewables and housing.</p>
<p><b>PPS10: Planning for Sustainable Waste Management (July 2005)</b></p>	<p>Options in the Partial Review need to correspond with locational criteria in Annex E.</p> <p>Waste management should be considered alongside other spatial planning concerns.</p> <p>The planned provision of new capacity and its spatial distribution need to be based on clear policy objectives, robust analysis of available data and information, and an appraisal of options.</p> <p>The pattern of waste management facilities should look forward over a sufficient period to prove attractive to investment but not constrain movement up the waste hierarchy.</p> <p>Need to identify the broad locations where the pattern of waste management facilities should be accommodated taking into account:</p> <ul style="list-style-type: none"> <li>~ any need for waste management, including for disposal of the residues from treated wastes, arising in more than one waste planning authority area but where only a limited number of facilities would be required; and,</li> <li>~ the extent to which existing, and consented waste management capacity not yet operational, would satisfy any identified need</li> </ul>
<p><b>Waste Strategy for England 2007 (May 2007)<sup>3</sup></b></p>	<p>Need to consider how can support the main elements of the new strategy:</p> <ul style="list-style-type: none"> <li>~ incentivise efforts to reduce, re-use, recycle waste and recover energy from waste;</li> <li>~ reform regulation to drive the reduction of waste and diversion from landfill while reducing costs to compliant businesses and the regulator;</li> <li>~ target action on materials, products and sectors with the greatest scope for improving environmental and economic outcomes;</li> <li>~ stimulate investment in collection, recycling and recovery infrastructure, and markets for recovered materials that will maximise the value of materials and energy recovered; and</li> <li>~ improve national, regional and local</li> </ul>

<sup>3</sup> Defra (2007) Waste Strategy for England 2007. Available from: <http://www.defra.gov.uk/environment/waste/strategy/>

	governance, with a clearer performance and institutional framework to deliver better coordinated action and services on the ground.
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