

Joint Merseyside Waste Development Plan Document

Preferred Options Consultation Draft Results of Consultation Report

STRICTLY CONFIDENTIAL

This Report is embargoed until such time as it has been approved for publication by Halton, Knowsley, Liverpool, St Helens, Sefton and Wirral Councils

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1 Purpose of the Report

This report provides both a statistical and qualitative analysis of the responses received during the Waste DPD Preferred Options public consultation which was held over a six week period (24th May 2010 to 4th July 2010). The statistical section concentrates on data that can be derived from unambiguous responses to the consultation questions. The qualitative elements provide a more in-depth analysis of all of the textual comments provided by consultees. It highlights key issues raised against each preferred option and the actions arising out of this for the Waste Team in taking the Waste DPD to the next stage.

Should Consultees wish to see that their individual consultation responses have been received for consideration in the Waste DPD preparation process, please visit <http://merseysideeas-limehouse.co.uk>. On this portal all responses and comments are logged and available for viewing.

2 Communication and Promotion of the Preferred Options Report

The following means were used to communicate the consultation to potential consultees:

- Statutory advertising (notices)
- Press Releases to local newspapers
- Posters in District Council Libraries, One-Stop shops and Council receptions
- Information on District Council websites with links to consultation portal (see below)
- Consultation events held in each District (2 in Halton and Knowsley, 1 in other Districts)
- Emails and letters sent to consultees on Merseyside EAS and Council SCI databases (3287 individuals and organisations)
- Letters to all local authority Councillors in Merseyside and Halton following local elections in May 2010
- Dedicated consultation portal for direct electronic response <insert address>
- Waste Planning Website: www.wasteplanningmerseyside.gov.uk

For more information on the consultation process, please refer to section 7 of this report.

3 Overall Levels of Participation in the Preferred Options Consultation

The consultation portal allows data to be gathered on use of the site during the consultation period. The cumulative visitor statistics for the site are shown in Table 1 below.

Web Traffic over 6 weeks	
Site visits	1994
Visits / week	332
Unique visitors	1185
Page views	16246
Pages / visit	8.1
Time / visit (min)	8.25

Table 1: Participation via the Consultation Portal

The statistics reveal a considerable level of interest with over 1000 unique visitors viewing the site over the consultation period. Clearly (see following section) only a small proportion of visitors left consultation responses and/or comments on the website. There is no way of measuring whether some of the website visitors responded to the consultation by other means, having initially browsed the consultation material on the website.

The attendance at consultation events also provides some useful information on the level of interest generated. A total of 148 consultees attended the eight events organised across the six Districts. Further details are reported in Section 5 of this report.

4 Responses received to the consultation.

Responses to the consultation were received by four principal methods:

- Direct web-site responses
- Responses on the paper questionnaire circulated with the Preferred Options Report
- Letters
- Emails

Additional responses were also received in the form of petitions, pro-forma letters and from comments received at consultation events.

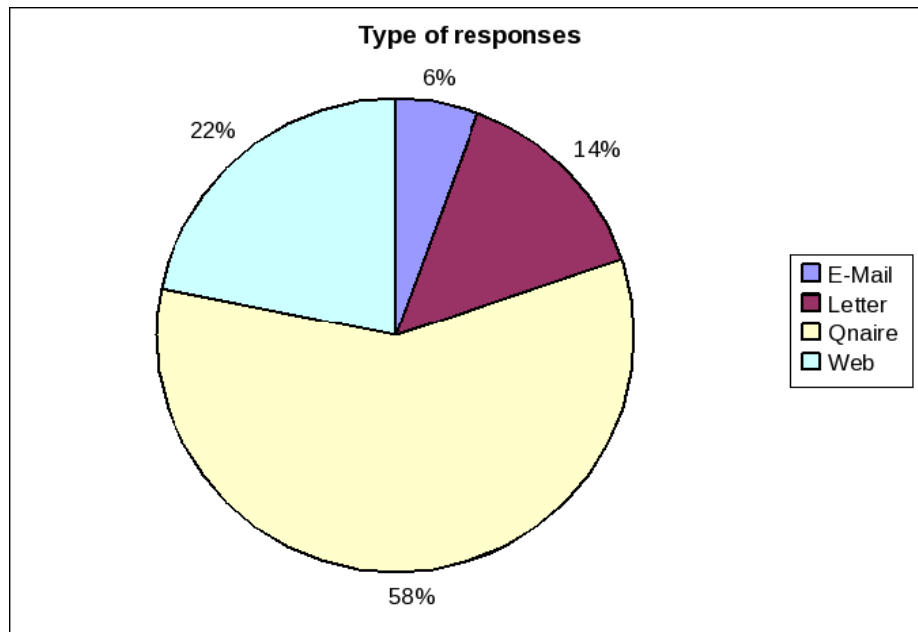
Web-site and questionnaire responses are easiest to analyse numerically since there are unambiguous answers to questions such as “Do you agree with the preferred option?” Where responses are received via letters and emails, these questions, although addressed, are not necessarily directly answered and in order to feed into numerical analysis, Merseyside EAS interpreted the responses received into answers to specific consultation questions that were posed. Where such interpretation has been applied, all results are posted on the consultation portal and consultees are able to check how their responses have been interpreted and analysed. Where an email address has been registered by a consultee, an email is automatically sent to the consultee informing of posting of comments on the portal. Other Consultees who registered comments will be notified about the publication of this report by letter.

The following table and pie chart shows responses received via the different methods of communication. Petitions and pro-forma letters are covered in a separate section (section 7)

Type	Number	Percent
E-Mail	69	6 %
Letter	176	14 %
Questionnaire	723	58 %
Web	271	22 %
Total	1239	100 %

Table 2: Responses received to Consultation

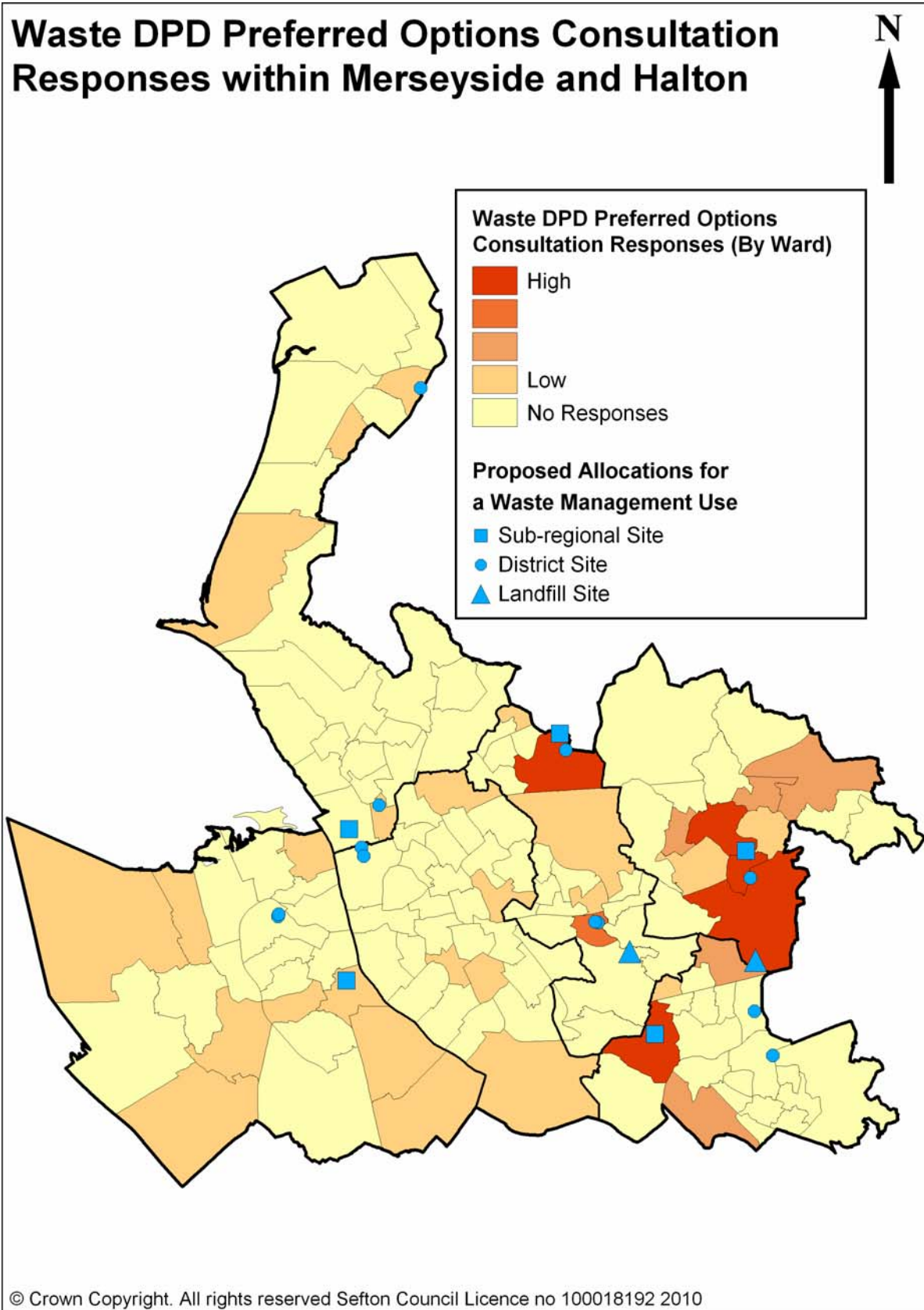
The bulk of the responses received were unambiguous (80% from web-forms and the paper questionnaire) with only 20% requiring some interpretation. Since most of the 20% emails and letters which did require some interpretation but were generally not problematic, we have a high degree of confidence that the results presented in the statistical summary of the individual questions provide an accurate picture of the views of the consultees who responded. Where needed the Merseyside EAS team contacted Consultees to seek further clarification on responses to individual questions to ensure that views were accurately interpreted and understood.



Each “response” in the above analysis represents a single answer to one of the specific consultation questions asked in the Preferred Options Report. These responses were made by **139 individual consultees, of which 64 represented organisations**. Since there were a total of 1239 responses, each consultee provided, on average answers to approximately nine consultation questions. This suggests that the comments received were generally provided following relatively “in-depth” consideration of the issues and were not dominated by single-issue responses.

5 Source of Responses

5.1 Geographic Analysis



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The map above shows the sources of consultation responses received by electoral ward. There is a clear clustering of responses around some of the proposed allocated sites, although there are also clearly some proposed allocations which did not attract much local comment. It should be noted that this analysis is based on the stated postcode of the consultee making the response.

It should be pointed out that in a consultation of this nature (covering six Districts) a large proportion of positive responses in respect of specific sites in one District will inevitably originate from consultees from other Districts or from consultees who have no particular interest in a District. The table below shows the extent of cross-boundary support for the sub-regional sites.

		Support for SR site from :		
	No of supporters*	% from within District	% other M/side	% outside M/side
Sefton	24	8	79	13
Halton	23	0	78	22
Knowsley	19	0	84	16
St Helens	15	13	73	13
Wirral	24	25	67	8

Table 3: Origin of support for sub-regional sites in responses to the Waste DPD consultation

*"Supporters" means those who ticked either "support" or "strongly support" for the indicated sites on the sub-regional sites consultation question.

3.2 Sector Analysis

Consultees responding to the Preferred Options consultation were categorised as:

- Private Individuals
- Private Organisations
- Public Organisations

Analysing all consultees according to this grouping, the following breakdown can be defined:

Group	Number of consultees	Percentage of consultees
Private Individuals	75	54 %
Private Organisations	37	27 %
Public Organisations	27	19 %

Analysing by individual response (at the level of consultation questions) provides a very similar breakdown:

Group	Number of responses	Percentage of responses
Private Individuals	655	53 %
Private Organisations	304	25 %
Public Organisations	280	23 %

Roughly half of the responses, therefore, were submitted on behalf of private individuals with the remainder, which were submitted on behalf of organisations, split roughly evenly between private sector and public sector organisations.

6 Analysis of responses to specific question.

For most of the consultation questions asked, this section contains a simple statistical analysis of the responses to all the questions asked followed by a qualitative analysis of the “free-text” responses provided on the questionnaire or in other communications. A small number of questions (notably Questions 1 - 4) required consultees to only provide their views as free-form text and for these questions no statistical analysis has been provided and only the qualitative analysis is shown.

Most of the questions analysed statistically fall into two groups:

- 1 Questions in which consultees were asked to state a preference for a “Preferred Option”, an “Alternative Option” or to reject (with justification / alternative proposals) either of the proposed options.
- 2 Questions in which consultees were asked to simply state agreement or disagreement with a “Preferred Option” (no alternative options offered).

For each question asked, we provide the number and title of the question but do not repeat the text of the Preferred and Alternative Options, which is often lengthy. Instead we have provided a short summary of the policy options. Readers are referred to the original Preferred Options Report to cross reference the full details.

For both of these types of questions there were a small number of responses in which consultees expressed a view (in the free-text box) on the question but omitted to tick a response box (e.g. “Agree with Preferred Option”) which provided an explicit response to one of the options offered. In these cases we have noted these as a “No Tick Response” in the tables below.

Question 1. Vision for the Waste DPD.

This question required free-form text responses and is therefore not analysed statistically.

Qualitative Analysis:

Key Issues raised:

- Suggestion that the vision should include specific mention of protection of heritage assets and the built environment.
- Suggestion that the vision should not only just state a limitation of negative impact but where possible, that the Waste DPD will enhance the health and environment of the communities in the sub region.
- Net self-sufficiency approach of the Waste DPD has not been adequately addressed or explained.
- Concerns about the effect waste management facilities may have on the property values on nearby homes and the health effects on local communities

Actions Arising for Waste DPD:

- The Waste Team will consider the points made about the protection of Merseyside's heritage assets and built environment, as well as the point made about potential enhancement of health and the environment, but the Waste DPD vision has already been through two consultations with a strong level of support. Any further changes made now will have to be strongly supported by large numbers of consultees. It is more likely that the supporting text will be changed rather than the Vision Statements themselves.
- The net self sufficiency issue is currently subject to further discussions with stakeholders and any changes or updates will be provided at the Waste DPD Publication stage.
- We understand the anxieties that arise regarding health issues and due weight has been given to them in the site selection methodology and search process through separation distances and consideration of the track record of modern well managed waste management facilities. Regarding property values, in the absence of credible evidence, the Waste DPD, and the planning system itself, cannot attempt to take property values into consideration at the plan-making stage.

Question 2. Strategic Objectives for the Waste DPD

This question required free-form text responses and is therefore not analysed statistically.

Qualitative Analysis:

Key Issues raised:

- SO6 was the most commonly commented objective (To minimise the adverse effects of waste management...). Minimisation of adverse effects of waste management facilities was considered inadequate by some consultees who would prefer to see no negative impacts at all from waste development.
- The opposite view was also expressed - that waste management effects are no different to other development and therefore should not be treated differently.
- Net self sufficiency policy inadequately addressed and explained.

Actions Arising for Waste DPD:

- An objective to minimise adverse effects will remain in the Waste DPD since as with all development these effects, in most cases, cannot be completely eliminated. The current objective appears to reflect a consensus “middle ground” between views of consultees taking up opposing extremes. The Waste DPD Team will however look again at all comments on SO6 and look at possible ways the suggestions can be implemented.
- The net self sufficiency issue is currently subject to further discussions with stakeholders and any changes or updates will be provided at the Waste DPD Publication stage

Question 3. The Proposed Strategy for meeting Merseyside and Halton's Waste Management Needs.

This question required free-form text responses and is therefore not analysed statistically.

Qualitative Analysis:

Key Issues raised:

- Net self sufficiency policy inadequately addressed and explained.
- Consultees wanted information on how the strategy could be achieved and what funding was available.

Actions Arising for Waste DPD:

- The net self sufficiency issue is currently subject to further discussions with stakeholders and any changes or updates will be provided at the Waste DPD Publication stage
- Clarify the limitations of the Waste DPD and where other strategies and initiatives can come in and help build the strategy.

Question 4. Spatial Strategy

This question required free-form text responses and is therefore not analysed statistically.

Qualitative Analysis:

Key Issues raised:

- Some concern about the clustering of sites and the effects this could have on traffic levels.
- Also concerns about the distance between housing (sources of waste) and waste management facilities. Waste sites should be located nearer the sources of MSW (homes).
- Clarification sought about the 4.5ha site area criterion for “sub-regional” sites.

Actions Arising for Waste DPD:

- The Waste DPD will continue to maintain a balance between proximity of facilities to sources of waste and impacts on communities. Use of alternative methods of waste transport will continue to be assessed wherever possible. Review and, if necessary, provide further supporting text on this issue in the next version of the Waste DPD.
- Clarify why 4.5ha was used as a cut off for sub-regional sites in the next public consultation.

Question 5. Waste Prevention and Resource Management

***Brief Explanation:** This question proposed two options; the preferred option was for the inclusion of a policy requiring all types of development to consider waste prevention. The alternative option was to not include a Waste DPD policy but to rely solely on Site Waste Management Plans (SWMP) to promote the important issue of waste prevention. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.*

Statistical Analysis:

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	38	78 %
Option 2 (Alternative)	1	2 %
Option 3 (Neither of these)	10	20 %

Qualitative Analysis:

Key Issues raised:

- Policy PO1 should be altered to give equal emphasis to recycling wherever it occurs (not just in Construction & Demolition) and it should be made clear that the policy applies to the building once it has been occupied.
- Suggestion that policy applies “where possible” weakens it and this wording should only be accepted with clear justification.

Actions Arising for Waste DPD:

- Clarify whether this is a generic policy about waste prevention throughout the life of a development (ie. construction and occupation) or whether the policy primarily addresses CD&E waste only.
- Make clear the scope within which the Waste DPD can make and enforce policies – this is largely limited to issues that can be addressed through the Planning System.

Question 6. Design and Layout for Sustainable Waste Management in New Development

***Brief Description:** Consultees were presented with two options. The preferred option was to include a policy within the Waste DPD that would require all new development to take account of design and layout for sustainable waste management in development design and layout. The alternative option was to ensure that District Core Strategies include a Design Quality Policy rather than the Waste DPD dealing with this issue. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.*

Statistical Analysis:

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	37	71 %
Option 2 (Alternative)	7	13 %
Option 3 (Neither of these)	8	15 %

Qualitative Analysis:

Key Issues raised:

- Scope should be expanded and include accommodation of kitchen waste collections as this would compliment services that Waste Collection Authorities are intending to bring forward imminently.
- Policy should acknowledge limitations more clearly, e.g. home composting irrelevant for flats (except as a communal facility if the block has private gardens) and that it may be difficult to meet some of the requirements in small properties that are already pushed for space.
- Significant level of support for alternative policy option (leave definition of policies to individual Districts).

Actions Arising for Waste DPD:

- Although there is general support of this policy, there needs to be some minor re-wording for clarity in terms of types of materials which are segregated and the appropriateness of home composting in various types of developments.
- Clarify why the preferred option was to have a policy in the WDPD and not in Core Strategies.

Question 7. High Quality Design of New Waste Management Facilities

***Brief Explanation:** This question proposed two options; the preferred option was for the inclusion of a policy requiring all new waste management facilities to ensure the design and environmental performance does not adversely impact of the surrounding area. The alternative option was not to include a Waste DPD policy but to include design of New Waste Management Facilities as part of the district led Design and Quality Statement. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.*

Statistical Analysis:

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	41	82 %
Option 2 (Alternative)	0	0 %
Option 3 (Neither of these)	9	18 %
No Tick Response	2	

Qualitative Analysis:

Key Issues Raised:

- Policy does not go far enough to ensure good design / minimal impact : BREEAM "Very good" not good enough - should aim for excellent from the outset.
- BREEAM is too onerous for industry and usurps the powers of Local Authorities.
- Comprehensive re-wording suggested by one Private Sector consultee while retaining broad thrust of the original policy

Actions Arising for Waste DPD:

- Although there is general support for this policy, there should be some further supporting text in the Waste DPD explaining why this position has been adopted and how it is seen as a "middle ground" position. DPD needs to explain how BREEAM standards for waste facilities in particular will make these developments more acceptable.
- Re-wording option will be considered since broad policy intention is not altered by the suggested wording

Question 8. Sustainable Waste Transport

Brief explanation: This question asked Consultees to comment on either the preferred option of including a policy within the Waste DPD that deals with sustainable transport issues, or support for the alternative option which will leave all transport issues to the Core Strategy for each individual district. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.

Statistical Analysis

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	37	70 %
Option 2 (Alternative)	3	6 %
Option 3 (Neither of these)	13	24 %
No Tick Response	1	

Qualitative Analysis

Key Issues Raised:

- There should be firmer controls on long-distance movements of waste.
- Aim to encourage sustainable transport and alternative modes but recognize increasing pressure on costs and need for justification of positive carbon reduction will both put pressure on more sustainable solutions.
- There needs to be convenient connectivity at the source of the wastes, whereas the WDPD tends to look at the destination (treatment/disposal site) only.

Actions Arising for Waste DPD:

- Need to explain that some of the controls that have been requested are not possible to implement within current planning law / guidance.
- Need to explain that purpose of policy not only to promote alternative modes of transport where feasible but also to try to minimise impact.
- Policy wording does need further consideration. As dialogue continues with Transportation teams, this information will be used to inform this policy area.
- Need to ensure that supporting text makes it clear that transport policy is included to reflect the nuisance caused by transport to communities in which waste infrastructure is housed and to demonstrate that a range of policy mechanisms are being used that are realistic to reduce impacts.

Question 9. Net Self Sufficiency in Waste Management

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD on net self sufficiency. This policy will require planning applications for waste management facilities to demonstrate how it will contribute to sub-regional net self sufficiency. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives (no tick response).*

Statistical Analysis:

Agreement to Preferred Option	Count	%
Yes	34	68 %
No	16	32 %
No Tick Response	1	

Qualitative Analysis:

Key Issues Raised:

- The “net” self-sufficiency approach is confusing to some Consultees.
- Some Consultees questioned whether there is evidence to support it.
- The policy should be more prescriptive, stating the outcome it will deliver rather than just being an aspiration which can only be partially met.

Actions Arising for Waste DPD:

- Policy needs to be better explained in both supporting text and policy wording to ensure that it is clear that exports and imports will be balanced.
- Evidence base chapter to be updated so that current and future imported waste is clearly identified where this can be estimated with reasonable accuracy.
- Role of commercial contracts needs to be emphasised in terms of waste movements across administrative boundaries and how this impacts upon self sufficiency.
- DPD will attempt to provide a full “balance sheet” for four main waste streams in revised Evidence base.

Question 10. Energy from Waste for Commercial & Industrial Waste

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD on provision of Energy from Waste facilities for commercial and industrial waste. This policy will state that there is no need to identify any new EFW capacity for this type of waste treatment as existing consents are capable of meeting the identified need. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Statistical Analysis:

Agreement to Preferred Option	Count	%
Yes	34	76 %
No	11	24 %
No Tick Response	3	

Qualitative Analysis:

Key Issues Raised:

- The plan is not “technology-neutral” since EfW sites are considered separately from other types of sites
- Not clear how Deliverability of sites has been assessed
- Should not rule out EfW completely

Actions Arising for Waste DPD:

- Make clear that “technology-neutrality” applies to specific technologies deployed (eg gasification, pyrolysis, mass burn, anaerobic digestion) but not to broad types of facility (EfW, Landfill, HWRC). Plan must be able to state which sites are suitable for which broad categories of facility type.
- Make clear deliverability of all sites is judged in terms of landowner support; availability of key utility connections on-site or within a reasonable distance and the willingness of the Council to take forward the allocation within the wider framework of its land use plan for the District.
- Make clear that small-scale EfW has not been ruled out and applications will be assessed on their merits according to a criteria-based policy which was included in the Preferred Options report.

Question 11. Energy from Waste for Municipal Solid Waste

Brief explanation: This question asked Consultees to comment on either the preferred option of including a policy within the Waste DPD that does not allocate any new sites for energy from waste for MSW, or support for the alternative option which would identify sites for EfW treatment of MSW. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.

Statistical Analysis:

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	29	64 %
Option 2 (Alternative)	3	7 %
Option 3 (Neither of these)	13	29 %

Qualitative Analysis:

Key Issues Raised:

- DPD Policy represents a barrier to EfW and fails to facilitate the delivery of the WDA's Procurement for the Resource Recovery Contract.
- The DPD should provide a criteria-based policy for EfW sites.
- Should not rely on any EfW solutions until health issues with this technology have been resolved.

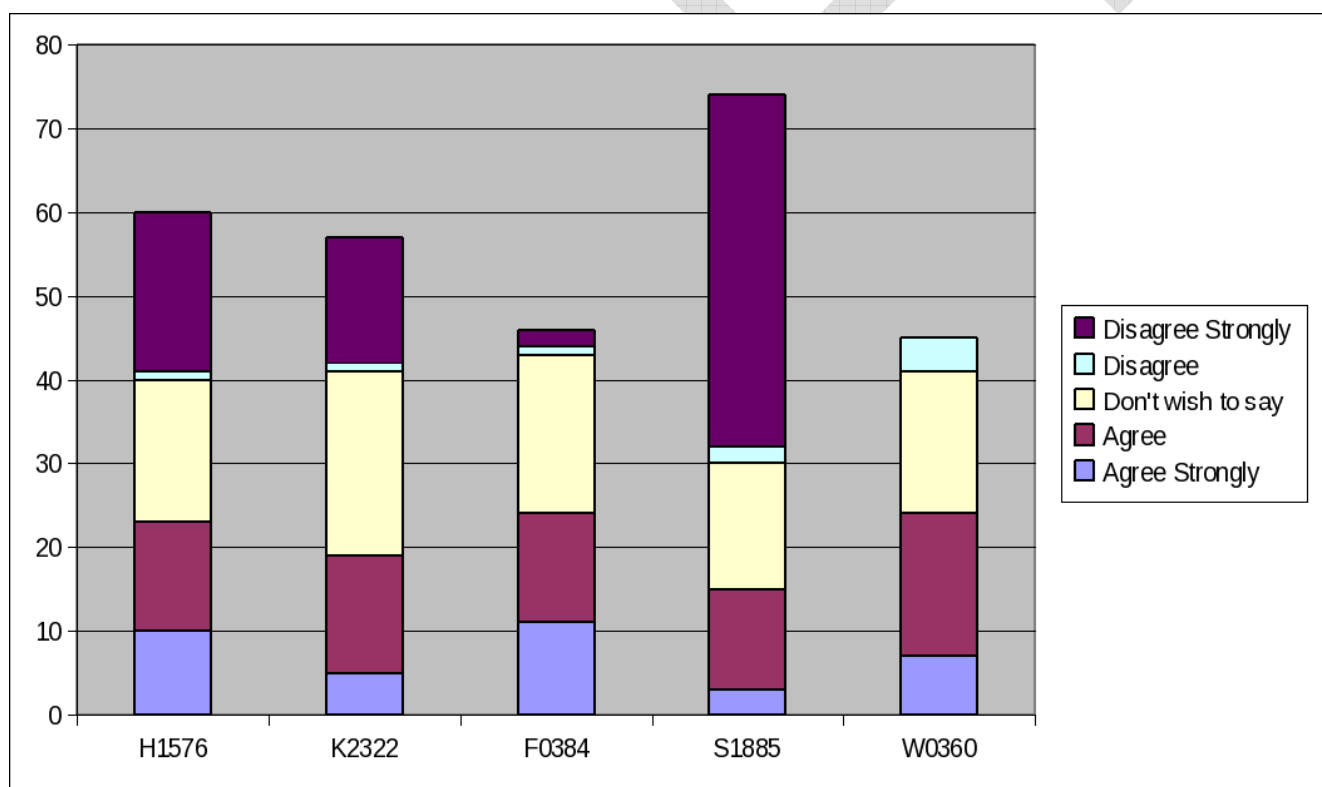
Actions Arising for Waste DPD:

- Make clear that DPD policy is simply reacting to existing consented capacity position.
- Criteria-based policies could be developed to deal with potential small-scale EfW.
- Make clear that evidence base and recent planning inquiries do not support the idea of "unresolved" health issues.

Question 12. Proposed Allocations for Sub-Regional Sites

Brief Explanation: Consultees were asked to show their support or opposition to the allocated sub-regional sites.

Consultee View	Site				
	H1576	K2322	F0384	S1885	W0360
Agree Strongly	10	5	11	3	7
Agree	13	14	13	12	17
Don't wish to say	17	22	19	15	17
Disagree	1	1	1	2	4
Disagree Strongly	19	15	2	42	0
No Tick Response	44	47	58	30	59
% Agree / Agree Strongly	38	33	52	20	53
% Disagree / Disagree Strongly	33	28	7	59	9



Site ID	Location
H1576	Ditton Sidings, Newstead Road, Halton
K2322	Butlers Farm, Knowsley Industrial Estate, Knowsley
F0384	Alexandra Dock 1, Metal Recycling Site, Sefton
S1885	Former Hays Chemical Site, Lancots Lane, St Helens
W0360	Car Parking/Storage Area, former Shipyard, Campbeltown Road, Wirral

Qualitative Analysis:

Key Issues raised:

- Opposition to Ditton Sidings by local residents on grounds of impact on local amenity – questions suggest that Merseyside EAS did not consider full range of sensitive receptors in the area.
- Why was the Ditton Sidings site chosen over the Widnes Waterfront site (consulted on at earlier stage and scoring better than Ditton sidings)?
- Ditton Sidings Sustainability Appraisal Report appears to show that the Ditton Sidings site is suitable only for WTS and HWRC, but the Profile in the PO Report shows a wider range of uses. Has the Sustainability Appraisal process been carried out properly and proper consideration given to its findings.
- Opposition to Butlers Farm on grounds of impact on Acorn Farm and surrounding greenbelt.
- Opposition to Lancots Lane site on grounds of impact on surrounding communities.

Actions Arising for Waste DPD:

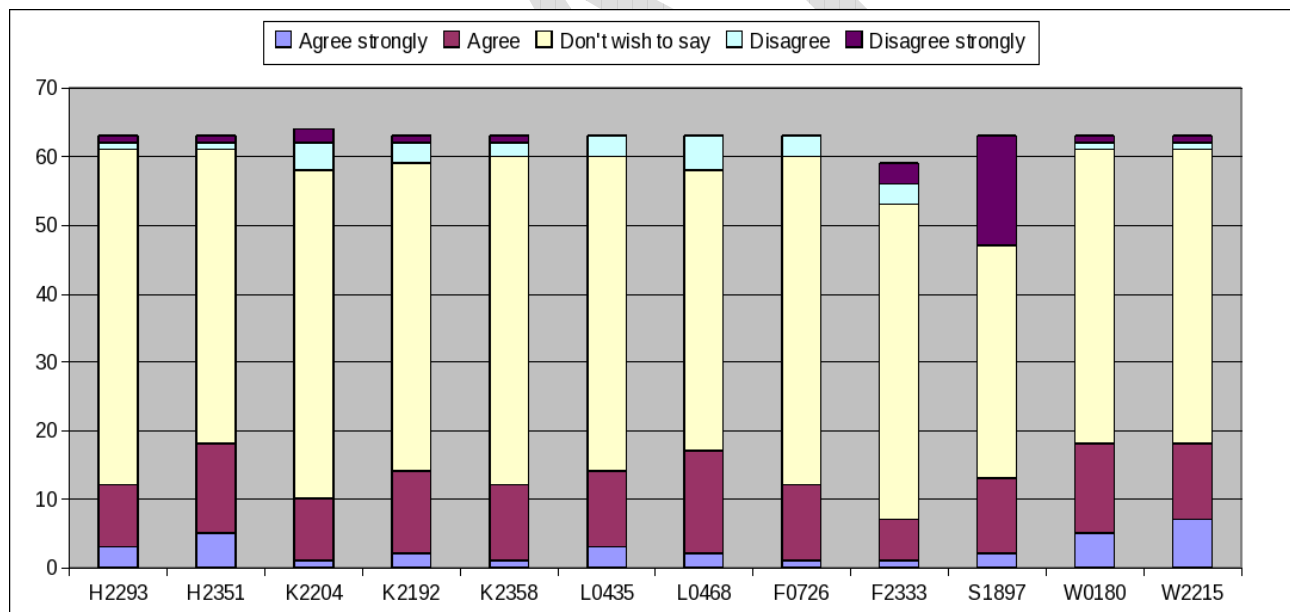
- The factors quoted by objectors have been taken into account in the scoring system, no further action required. An exception is the Halebank Village Green – no specific score is attached to a village green in the scoring system. There are no plans to alter the scoring system now.
- Ditton sidings will remain the Halton Preferred sub-regional site unless Halton Council decide otherwise.
- There was an error in the Sustainability Appraisal report which suggested restricted uses for the Ditton Sidings site. This error has now been corrected. The correct range of uses for this site is shown in the site profile for the site on p 80 of the PO Report.
- Butlers Farm is employment land in the Knowsley UDP. Waste Management is a legitimate use of the land. However the site boundary and configuration could be reviewed to minimise impacts on adjacent properties
- Lancots Lane site has now been removed from the plan by a resolution of St Helens Council. A new site in St Helens will need to be identified.

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Question 13. Proposed Allocations for District Sites

Brief Explanation: Consultees were asked to show their support or opposition to the allocated District level sites.

Consultee Views	District Site											
	H2293	H2351	K2204	K2192	K2358	L0435	L0468	F0726	F2333	S1897	W0180	W2215
Agree strongly	3	5	1	2	1	3	2	1	1	2	5	7
Agree	9	13	9	12	11	11	15	11	6	11	13	11
Don't wish to say	49	43	48	45	48	46	41	48	46	34	43	43
Disagree	1	1	4	3	2	3	5	3	3	0	1	1
Disagree strongly	1	1	2	1	1	0	0	0	3	16	1	1
No Tick Response	1	1	0	1	1	1	1	1	5	1	1	1
% Agree / Agree Strongly	19	29	16	22	19	22	27	19	12	21	29	29
% Disagree / Disagree Strongly	3	3	9	6	5	5	8	5	1	25	3	3



Key to Sites:

Site ID	Location	Site ID	Location
H2293	Runcorn WWTW, Halton	L0468	Site off Regent Road / Bankfield Street, Liverpool
H2351	Eco-cycle Waste Ltd, 3 Johnson's Lane, Widnes, Halton	F0726	1-2 Acorn Way, Bootle, Sefton
K2204	Brickfields, Ellis Ashton Street, Huyton, Knowsley	F2333	55 Crowland Street, Southport, Sefton
K2192	Image Business Park, Acornfield Road, Knowlsey Industrial Estate	S1897	Land North of T A C Abbotsfield Industrial Estate, St Helens
K2358	Former Pilkington Glass Works, Ellis Ashton Street, Huyton Industrial Estate	W0180	Former Goods Yard, Adjacent Bidston MRF / HWRC, Wallasey Bridge Road, Wirral
L0435	Waste Treatment Plant, Lower Bank View, Liverpool	W2215	Bidston MRF / HWRC, Wallasey Bridge Road, Wirral

Qualitative Analysis:

Key Issues raised:

- Too much emphasis on existing sites and intensification of use. More capacity needs to be provided on new sites, unconstrained by existing developments
- Objection to Huyton sites (K2204 and K2358) - too much waste-related development on this industrial estate already. Potential traffic problems.
- Objection to Abbotsfield Ind Est site (S1897) - too close to sensitive receptors including housing and green belt.
- Crowland St (F2333): Traffic Issues; Environment Agency Flood Defence issues; Petition and Alternative Site Suggestion received from local residents.
- Transport issues at sites – Acorn Way (F0726): British Waterways advise canal amenity needs to be safeguarded; Bankfield St (L0468) could be in conflict with Canada Dock Railway re-instatement.

Actions Arising for Waste DPD:

- Quantify potential for intensification of capacity on existing sites and ensure that this (plus capacity on new sites) matches needs assessment.
- S1897 is not located within the green belt and there is a large embankment between the site and adjacent residential property.
- After further review of Needs Assessment, allocation of these sites will be reviewed against future need.
- Investigate whether all factors raised had been taken into account during site assessments.
- Alternative site, as suggested by local residents to be investigated.
- (a) Site profile for F0727 to be amended to ensure that British Waterways issues on canal amenity are reflected; (b) L0468 to be discussed with Merseytravel and other stakeholders with a view to safeguarding the railway alignment while keeping the site in the DPD.

Strictly

4.14 Question 14. Phasing of Proposed Allocations.

This question required free-form text responses only.

Qualitative Analysis

Key Issues raised:

- Pragmatic approach is required - sites which can be up and running soonest should be phased earliest. Take into account factors such as the state of the market, availability of energy customers, and separation from sensitive receptors (e.g. residential development) etc.
- Sites which are processing higher up the hierarchy should go first
- Plan should not concern itself with phasing.
- Start with more central sites as these will make optimal use of transport links.

Actions Arising for Waste DPD:

- Pragmatic approach for phasing will be investigated further. However, Waste DPD will have to concern itself with phasing at some level of detail since this is an expectation of government / PINS.
- Criterion on processing higher up the hierarchy could be adopted into a set of “pragmatic” criteria for early phasing of sites.
- Proximity to transport links could also be adopted into a set of “pragmatic” criteria for early phasing.

Question 15. Areas of Search for Re-processors and Additional Small Scale Waste Management Facilities

Brief explanation: This question asked Consultees to comment on either the preferred option of including a policy within the Waste DPD which would direct developers to existing clusters of sites and allocations or, the alternative option which would direct development to defined Areas of Search with boundaries. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	22	48 %
Option 2 (Alternative)	2	4 %
Option 3 (Neither of these)	22	48 %
No Tick Response	8	

Qualitative Analysis

Key Issues raised:

- Areas of Search could lead to certain areas being overwhelmed with waste facilities as more and more sites are identified in them.
- Additional site needs should be assessed on a case-by-case basis.
- Criteria to be used to assess sites within areas of search should be made clear.
- There should be no Areas of Search within residential areas.

Actions Arising for Waste DPD:

- Investigate and publish criteria to be used in assessing sites within Areas of Search.
- Explain why Areas of Search are needed.
- Establish clearly that criteria would include density of existing waste uses and balance between synergy and clustering versus overwhelming areas with waste uses.

Question 16. Preferred Option for Additional HWRC Requirements

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD that highlighted the areas of search for new or replacement HWRCs. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Agreement to Preferred Option	Count	%
Yes	23	61 %
No	15	39 %
No Tick Response	3	

Qualitative Analysis

Key Issues raised:

- Revision of MWDA requirements means replacement or additional HWRC sites in Wirral are not required.
- There is now a need for Commercial WRCs which take trade waste to prevent any increase in fly-tipping, given increased enforcement at HWRCs.
- Access to HWRCs should be flexible, based on proximity of populations, not on District boundaries.

Actions Arising for Waste DPD:

- Remove Wirral requirements for HWRCs from Waste DPD.
- Final review of site requirements will consider whether to meet the commercial waste reception requirement through Commercial Waste Transfer Stations (as currently) or whether to provide for a new type of site – the Commercial Waste Reception Centre
- Explain the limitations of the Waste DPD in allocating sites – these can only be allocated within the Districts participating in the DPD.

Question 17. Proposed inert landfill allocations

Brief explanation: Consultees were asked to show their support or opposition to the proposed site allocation for inert landfill.

Consultee View	Site	
	EAS0002	MIN066
Agree Strongly	5	4
Agree	7	9
Don't wish to say	32	21
Disagree	2	2
Disagree Strongly	0	10
No Tick Response	0	0
% Agree / Agree Strongly	26%	28%
% Disagree / Disagree Strongly	4%	26%

Key to Sites :

Site ID	Location
EAS0002	Cronton Claypit , Knowsley
MIN066	Bold Heath Quarry, St Helens

Qualitative Analysis

Note that only one free-text comment was submitted on this question. Nonetheless several issues of importance were raised and are analysed below as for other questions.

Key Issues raised:

- There could be an inaccuracy in calculation of voidspace at the two proposed landfills resulting in there being less available voidspace than indicated in the Preferred Options report.
- The assumed delivery rate of voidspace at both proposed landfills is not guaranteed/reliable.
- Site at Carr Lane, Wirral is suitable for deposit of inert waste and should be considered as additional available void.

Actions Arising for Waste DPD:

- Discuss correct voidspace calculation with consultee and Technical Advisory Group – re-calculate if appropriate.
- Discuss rates of extraction of mineral reserve with operators of these sites and determine most likely rate of delivery of voidspace for both sites.
- Re-iterate previous assessment of Carr Lane site which has serious deliverability issues and was not included in the Preferred Options report for that reason.

Question 18. Planning Applications Outside Allocated Sites

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD that deals with planning applications outside allocated sites. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Agreement to Preferred Option	Count	%
Yes	34	68 %
No	16	32 %

Qualitative Analysis

Key Issues raised:

- Policy needs more detail of the criteria which would be used to assess unallocated sites. One comment suggests it should be the same as the site assessment criteria used already.
- Some concern that allocations are automatically favoured over unallocated sites even if the latter are found to be more sustainable when they are brought forward.

Actions Arising for Waste DPD:

- Supporting text needs to make it clearer that the assessment of allocated and unallocated sites should be based on the same criteria and principles.
- Make clear at Publication stage that the Waste DPD does not stop new sites being brought forward and tested on their merits.
- Make clear how allocations, consents and contingency will be considered in plan monitoring and in the plan review process.
- Provision of site selection criteria in the Publication Waste DPD.

Question 19. Dealing with Planning Applications for Landfill Outside of Allocated Sites

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD dealing with planning applications for landfill on non-allocated sites and the criteria that must be met during application. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Agreement to Preferred Option	Count	%
Yes	32	71 %
No	13	29 %
No Tick Response	2	

Qualitative Analysis

Key Issues raised:

- Policy needs more detail of the criteria which would be used to assess unallocated landfill sites
- The policy will need to make specific reference to the pressing need to permit sites for non-inert waste.

Actions Arising for Waste DPD:

- Include the site selection methodology for landfills as an Appendix at the Publication stage of the Waste DPD.
- Make clear that the site selection methodology applies to both inert and non-inert landfill sites.

Question 20. Planning Applications for Open Windrow Composting

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste that dealt specifically with Open Windrow Composting and the impact assessments that would need to be made during the application stage. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Agreement to Preferred Option	Count	%
Yes	29	74 %
No	10	26 %
No Tick Response	2	

Qualitative Analysis

Key Issues raised:

- More detail should be provided on specific criteria to be used to assess suitable locations not just the 5 general bullets in PO12.
- Green Belt is an inappropriate location.
- Sites should generate no smells or emissions.
- Policy repeats national policy position and adds nothing.

Actions Arising for Waste DPD:

- Include more detail on specific criteria at Publication stage and consider re-ordering policy to make it clearer.
- Reference will be made to national planning guidance PPG2 – Green Belt and PPS10 - Sustainable Waste Management in the supporting text, with regard to the suitability of the Green Belt for open windrow composting.
- Make clear that all sites will have to comply with environmental permits regulated by the Environment Agency.
- Consider how policy can add a stronger local dimension to national policy guidance.

Question 21. Protecting Existing Waste Management Sites

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD indicating that existing and consented waste management facilities will be protected in order to maintain essential waste management infrastructure. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Agreement to Preferred Option	Count	%
Yes	35	80 %
No	9	20 %
No Tick Response	1	

Qualitative Analysis

Key Issues raised:

- Concern regarding whether all sites to be protected for the length of the plan (including HWRCs).
- Plan should support intensification or changes to functions on site to retain viability.
- Existing badly-run or badly-sited sites should not be protected.

Actions Arising for Waste DPD:

- Make clear that all existing sites are regarded as essential infrastructure and should be protected. Equally make clear that status of sites will be regularly reviewed as part of the plan monitoring arrangements.
- Make clear that the aim is to protect consented and operational capacity as well as sites.
- Make clear that operational aspects of a site are a matter for Environmental Permitting rather than the planning regime. Make a clear distinction in terms of operational aspects of a site that are (1) planning matters, (2) Environmental Permitting and (3) Environmental Health matters.
- Make clear that the plan should allow for gradual evolution of sites to those locations which are most environmentally suitable – so long as capacity is maintained, loss of sites could be tolerated in locations which are less sustainable.

Question 22. Restoration and Aftercare

***Brief explanation:** This question proposed two options: the preferred was for the inclusion of a policy requiring the restoration and aftercare of landfill facilities once operations have ceased. The alternative option was not to include a Waste DPD policy but to rely on policies within District Core Strategies to deal with this issue. Should Consultees disagree with both options, they were able to tick the 'Option 3' box.*

Preferred, Alternative or Neither	Count	%
Option 1 (Preferred)	38	83 %
Option 2 (Alternative)	3	6 %
Option 3 (Neither of these)	5	11 %

Qualitative Analysis

Key Points Raised:

- Suggestions that funding from operator and other sources should be secured at application stage so is relevant to the land use plan.
- Criteria in PO14 need to include reference to funding and also defining timescales for operation and phased restoration if applicable.
- Policy wording needs to be more specific.
- There should be more community consultation with respect to the restoration and afteruse.

Actions arising for Waste DPD:

- Many of the comments are actually already covered in the Reasoned Justification. Therefore the Waste DPD must consider whether it would be clearer for some of the reasoned justification to be extended into policy.
- Review wording of PO14 bullets and see if they can be worded to say more clearly what is required.
- Discussion needed with EA regarding overlaps with EA permitting scheme.

Question 23. Waste Management Development Criteria and Evaluation of Impacts

***Brief explanation:** This question asked Consultees to comment on the preferred option of including a policy within the Waste DPD which allows the impacts of planning applications for new waste management facilities to be assessed against a list of detailed criteria. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.*

Agreement to Preferred Option	Count	%
Yes	39	83 %
No	8	17 %

Qualitative Analysis

Key Points Raised:

- Several responses favour additional detail in the definition of criteria and the nature of assessment to be provided.
- PO15 needs to be reworded as it currently implies every application has to address all the criteria listed in Box 6. More emphasis needed on case-by-case evaluation of the appropriate criteria.
- Several responses pointing out the overlap with Environmental Permitting regime although EA response acknowledged a full list could help at pre-application stage.
- Specific mention of: transport contribution to climate change; reference to transport strategy for employees and visitors (not just waste movements to/from the site) and site flood risk assessment where appropriate are needed.
- Concern that the criteria are too restrictive and doesn't provide enough flexibility for the waste management industry.

Actions arising from Waste DPD:

- Liaise and consult with stakeholders regarding existing criteria, proposed new criteria and overlap with Environmental Permitting regime.
- Consider re-wording and/or re-ordering of criteria to give a clearer indication of requirements.
- Provide more clarity on various issues in the reasoned justification.

Question 24. Preferred Option for Implementation and Monitoring

Brief explanation: This question asked Consultees to show support for the preferred approach for the implementation and monitoring of the Waste DPD. No alternative option was provided but Consultees were able to vote against the preferred option and propose alternatives.

Agreement to Preferred Option	Count	%
Yes	29	73 %
No	11	28 %

Qualitative Analysis

Key Issues Raised:

- Concern that some targets are too vague.
- Several suggestions for additional criteria e.g. monitoring waste miles, comparison of recycling rates between sites, role of PFI, landfill tax and funding mechanisms, scale of new development and constraints to other infrastructure. Some of which would be too difficult to obtain information on, or beyond the remit of the Waste DPD.
- Suggestions for additional criteria e.g. jobs created, local reaction/experience.
- Point raised that agreement is needed with all the parties listed in the implementation and monitoring strategy, to ensure that officer time is available to assist with the process.

Actions arising for Waste DPD:

- Review this section for the Publication waste DPD including resources for monitoring and implementing the Plan.
- Consider inclusion of additional monitoring criteria in line with suggestions from consultees, but ensure that only criteria that can be monitored are finally included.

7 Petitions and pro-forma letters.

The following petitions and signed pro-forma letters were received objecting to the proposed allocation of the specific sites mentioned:

Site	Materials Received	Number of Signatures
F2333, Crowland Rd, Sefton	Petition with letter from Cllr Sumner, Sefton Council.	77
K2322, Butlers Farm, Knowsley	Petition from local residents	91
H1576, Ditton Sidings, Halton	Two petitions from local residents	158
S1885, Lancots Lane, St Helens	Two petitions from local residents	1554

8 Sites Brought Forward During the Consultation

A number of sites were brought forward by landowners and land agents during the consultation. These sites have been split into the following 2 tables:

Table A. Sites which are already included in our Waste DPD sites database

Table B. Sites that have not previously been considered in the Waste DPD sites database.

The sites will be assessed in the same way as all other sites included in the Preferred Options report, using the Built Facilities Methodology. The sites that have been brought forward will also be discussed with the Local Planning Authorities.

It should be noted that whilst the need for additional sites is generally decreasing (as more facilities come online and waste arisings fall) it is possible that replacement sites may be required if any sites are withdrawn as a consequence of the consultation process.

Table A: Existing Sites (within the Waste DPD Sites Database) Brought Forward

Site ID	District	Site Location	Area (ha)	Easting	Northing
K2297	Knowsley	Former BICC site, Carr Lane, Prescot	2.1	346336	392145
F0738	Sefton	Worcester Garage Ltd, Hawthorne Road, Bootle	0.8	334643	396044
F2165	Sefton	Foul Lane Reception Centre, Southport	8.8	336234	415797
H2361	Halton	Site off Clifton Road/Cholmondeley Road, Runcorn	9.1	352817	379629
H2309	Halton	Widnes Waterfront Site, Moss Bank Road	8.8	353204	385389
L0558	Liverpool	Site between Bankhall Lane and Canal	0.9	334289	393667
L2337	Liverpool	Land off Stalbridge Road, Garston	5.8	340016	384264
L2359	Liverpool	Albion Chemicals site, King Street, Garston	2.7	340008	383539
S1687	St.Helens	Former Ravenhead Glass Site, St Helens	9.3	350503	394392
W2303	Wirral	Land at Hooton Park, Eastham	6.4	337344	380070
*W2370	Wirral	Land to South of QEII Dock, Eastham	4.8	336894	380571

*Brought forward as a suggested Area of Search

Table b: New Sites (not previously within the Waste DPD Sites Database) Brought Forward

Site ID	District	Site Location	Area (ha)	Easting	Northing
K2399	Knowsley	Henry Diaper & Co. Ltd site, Depot Road, Knowsley Industrial Estate	4	343333	399719
S2400	St.Helens	Land to the rear of 522 Fleet Lane	3.3	354653	394406
K2403	Knowsley	Re-Cyclers Organisation Limited, Link Road, Huyton Business Park	0.6	345502	390228

9 Consultation Events.

As part of the consultation process, eight public meetings were held around the sub-region, a minimum of one per district. These meetings were held to give the public an opportunity to find out more about the Waste DPD and Preferred Options Report and also to provide the chance to discuss various issues with both the Waste Team and district officers. The meetings also had the added use of flagging up key issues that need to be resolved or investigated prior to the next stage of the Waste DPD.

Date and Venue	Number of attendees
Wednesday 9th June 2010 @ the Kirkby Suite, Knowsley.	19
Monday 14th June 2010 @ the Huyton Suite, Knowsley.	14
Wednesday 16th June 2010 @ Wallasey Town Hall, Wirral.	18
Monday 21st June 2010 @ Stobart Stadium Halton.	19
Wednesday 23rd June 2010 @ Runcorn Town Hall, Halton.	7
Thursday 24th June 2010 @ Bootle Cricket Club, Sefton.	5
Tuesday 29 th June 2010 @ World of Glass, St Helens.	59
Thursday 1st July 2010 @ Millennium House, Liverpool.	7

There was no need to register for the event; people could just turn up on the day.

An informal drop in session was held from 5.00pm until 6.00pm and time was set aside for informal discussions following the Questions and Answer session.

An introductory presentation on the Waste Plan and Preferred Options Report started at 6.00pm. Attendees then had the opportunity to ask questions and provide feedback on the Waste Plan during the Question and Answers session. There was also a representative from the relevant authority's Waste Collection Department in attendance to answer any queries regarding household waste and collection arrangements.

These meetings provided the public with opportunity to talk to the waste team and district officers, and also provided a means of flagging up issues regarding the Waste DPD, site allocations and consultation process itself.

Below is a brief rundown of the key points made by attendees at the meetings:

- Site specific comments ranging from full protect against allocations to access concerns.
- Concern that the consultation was hollow and would not result in any changes to the Waste DPD.

DRAFT Results of Consultation on Waste DPD Preferred Options Report

- Criticisms of the consultation process – many attendees felt that the consultation period was not advertised widely enough.
- Issues regarding the management of waste from outside the sub-region or district.
- Issues with the technical detail of the Report – attendees felt it needed to be more accessible and written in 'plain English'.
- Frustration about the report not stating the exact waste use that may or may not go on the site allocations. Attendees wanted more information about how potential sites would be used.
- Concerns about emissions and odour problems from potential sites
- Issues regarding the possible deletion of allocated sites and what effect would this have on the land requirements i.e. where would replacement sites be found.
- Blight issues in certain areas affected by allocations.
- Some attendees expressed concern about being effected twice by planning decisions. For example the allocation of a site formally used at a chemical factory. Residents felt they had been affected enough by potential negative uses.
- Concerns about potential health effects from waste use on certain sites.
- Attendees informed both the Waste Team and district officers about potential planning applications in neighbouring districts.

The issues stated above are just a handful of the comments we took at the meetings. All of these issues are currently being assessed to help inform the development of the Waste DPD, including any future consultations.

10 Next Steps

All responses received as part of the Preferred Options Consultation and actions identified in this report will be dealt with prior to the Publication stage of the Waste DPD. Prior to this there will be a second Preferred Options public consultation that will focus on a short report detailing replacement sites for waste management facilities. For further information on this consultation and all other stages of the preparation of the Waste DPD, please visit www.wasteplanningmerseyside.gov.uk.