

**REPORT TO:** Executive Board

**DATE:** 18<sup>th</sup> December 2008

**REPORTING OFFICER:** Strategic Director - Environment

**SUBJECT:** Council Response to the Public Consultation on the Merseyside Joint Waste Development Plan Document Spatial Strategy and Sites (SSS) Report

**WARDS:** All

## **1.0 PURPOSE OF THE REPORT**

- 1.1 Halton Borough Council is involved in producing a Joint Waste Development Plan Document (DPD) for the Merseyside sub-region. Production has reached the stage where the sites and strategy underpinning the policies contained in the Waste DPD will be subject to public scrutiny. The Regional Spatial Strategy and government policy (PPS10) requires that waste must be dealt with in a sustainable way.
- 1.2 Over the period 17 November 2008 to 9 January 2009, now extended to 16 January, the Spatial Strategy and Sites (SSS) Report has been placed on public consultation. As a consultee, the Council has prepared a formal response to this consultation.

## **2.0 RECOMMENDATION: That**

- (1) the Executive Board approve the content of this report as the formal response of Halton Borough Council to the public consultation on the Halton Council, Liverpool City Council, Knowsley Council, Sefton Council, St Helens Council and Wirral Council Joint Waste Development Plan Document Spatial Strategy and Sites Report.

## **3.0 SUPPORTING INFORMATION**

- 3.1 The Waste DPD is being produced by Merseyside Environmental Advisory Services (MEAS) on behalf of the six greater Merseyside districts (Halton, Knowsley, Liverpool, St Helens, Sefton, and Wirral). This will be the spatial, land-use planning document for waste-related development in the Merseyside sub-region. It deals with the scale, location and type of facilities required to manage all waste (commercial, industrial, municipal, construction and demolition and hazardous) in Merseyside and Halton. It will set out the spatial strategy for new waste development and include site allocations for new waste facilities. Criteria-based policies will also be included to provide a consistent approach for

dealing with waste planning applications across the six relevant authorities.

### 3.2 Issues Addressed in the Spatial Strategy and Sites Report

3.3 The Spatial Strategy and Sites Report builds on the foundations laid by the first formal consultation, the Issues and Options Report (March – April 2007). Importantly, it takes the key messages from that consultation and has brought new information to bear on these issues through further evidence gathering, technical assessments and informal consultation with stakeholders in the development of the Spatial Strategy and Sites Report. This on-going process has involved regular dialogue with District Planning Officers, Stakeholder Group and Technical Advisory Group amongst others.

3.4 The Spatial Strategy and Sites Report addresses eight key issues:

- Vision.
- Strategic objectives.
- The resource-recovery-led strategy.
- Spatial strategy options.
- Climate change and energy security.
- Site selection methodology.
- Listings and profiles for top scoring sites.
- The need for further technical assessment and search for landfill and land raise.

3.5 Each of these issues is discussed in turn.

3.6 The consultation report contains 14 consultation questions which consultees are asked to respond to. It is important to note that to get the maximum value out of the process that the summary and the full document should be read in full prior to responding.

## **4.0 POLICY IMPLICATIONS**

### 4.1 Vision

4.2 Page 33 of the report sets out the Vision for the Waste DPD. It is the direction of travel and where Merseyside and Halton wish to be with respect to sustainable waste management in 2025. The vision remains substantially unchanged since that presented as Issues and Options stage because excellent consensus was achieved at that juncture. Question 7.1 invites comments on the Vision. The Council agrees with the proposed vision.

### 4.3 Strategic Objectives

4.4 These are high-level objectives stating what the Waste DPD is seeking to achieve and they are presented in page 35. The strategic objectives

remain unchanged for the most part since Issues and Options, though improvements have been made as a consequence of sustainability appraisal and the results of Issues and Options consultation. Question 7.2 (page 35) invites comment on the strategic objectives. The Council agrees with these stated Strategic Objectives.

#### 4.5 Resource Recovery-led Strategy

4.6 Merseyside and Halton are over-reliant on exporting much of its waste to landfill, especially (for MSW) by vehicles into Warrington and Wrexham. This position has to change, as it is inherently unsustainable. Notwithstanding the contractual positions, there is also a big question mark over whether areas adjacent to the Liverpool City Region will, in planning terms, continue to accept waste from Merseyside and Halton.

4.7 The change away from landfill is being driven by a multitude of factors including cost, legislation, environmental concerns, community concerns and impacts, climate change and the severe lack of available landfill. In addition, it is being driven by the need to extract as much useful resource out of the waste we generate. All these factors, along with the evidence base, result in moving waste planning and strategy towards waste minimisation, higher levels of recycling and diversion away from landfill.

4.8 The Spatial Strategy confirms Merseyside & Halton should become net self-sufficient in terms of waste management by 2025. The Spatial Strategy and Sites Report therefore seek to export only as much waste as is imported. Consultation question 8.1 on page 37 seeks comments on this matter. The Council agrees with the proposed strategy.

#### 4.9 Spatial Strategy

4.10 Section 9 presents the pattern of waste facilities or spatial strategy proposed. Table 9.2 includes a facility forecast for the sub-region to 2025. A total of 26 new facilities are required, including 6 landfills, which are not the subject of this consultation. It should be noted that there is a numeric error in this table, which incorrectly shows a total of 27 facilities instead of the 26 that are needed.

4.11 The spatial strategy takes account of land availability, infrastructure requirements, proximity to waste arisings, existing waste facilities and the movements of waste throughout the sub-region. It is also important to ensure that the Waste DPD delivers facilities, which provide a workable operational solution for the sub-region and are a realistic proposition to industry.

4.12 Question 9.1 on page 46 asks for comments on the approach used to define the spatial strategy. The Council agrees with the key criteria used for defining the spatial strategy.

4.13 The report then goes on to present three spatial strategy options. Each of these options is supported by a map to summarise the options (Figures 9.2 – 9.4). Spatial Strategy option 1 – A sub-regional site approach, is chosen as the preferred spatial strategy option. Consultation responses are invited on this in Question 9.2 (page 58). The Council agrees that option 1 should be the preferred spatial strategy option.

#### 4.14 Climate Change and Energy Security

4.15 Consultation questions 10.1 and 10.2 (pages 61 and 62) ask specific questions relating to whether energy from waste such as heat and power should be provided to all major waste development including residential such as district heating schemes or just major non-residential development. The Council feels that “energy from waste” covers too broad a range of technologies (from anaerobic digestion through to pyrolysis) to be able to provide a response to this question. Although the recovery of energy from waste is an accepted method of waste treatment it is inappropriate to conclude that these methods could be applied to all major developments, residential or otherwise. The Council therefore has no response to questions 10.1 and 10.2 but comments that the question is too generic.

#### 4.16 Site Selection Methodology

4.17 Consultation question 11.1 (page 67) seeks views on the site selection methodology. Members should note that this method has previously been agreed with the Merseyside Leaders Group. The Council agrees with the method used to identify waste management sites.

#### 4.18 Listings and Profiles for Top Scoring Sites

4.19 Halton has a substantial proportion of the waste facilities that serve the Liverpool City Region and wider geographical area. Halton has a hazardous landfill site at Randle Island, Runcorn operated by Ineos Chlor Ltd. At Shell Green, in Widnes, sewage sludge is taken from seven wastewater treatment plants across the northwest. This is then processed by de-watering and incineration. When operational, Ineos Chlor’s combined heat and power plant at Weston Point, Runcorn, will be able to process 850,000 tonnes of solid recovered fuel from waste each year. In addition to these large scale secondary treatment and disposal facilities, Halton has 18 waste transfer stations located in the Borough. This gives Halton the largest concentration of waste transfer stations, per head of population, in the North West. Halton already makes a significant contribution to the waste treatment and disposal needs of the Merseyside sub-region.

#### 4.20 Areas of Opportunity

- 4.21 The site method and spatial strategy identifies six broad areas across the sub-region where there are clusters of the better scoring sites. Unsurprisingly many of these are clustered around areas requiring regeneration, clusters of existing waste management facilities or in industrial areas. Consultation question 12.1 (page 69) seeks feedback on the six broad areas of opportunity that have been identified. The Council agrees that, in broad terms, the Area of Opportunity in Halton would cover the locations where waste uses are likely to be acceptable in land use terms.
- 4.22 As part of the joint Waste Planning Group, Halton must put forward a selection of sites to accommodate waste uses in the sub-region. All districts had to put a minimum of 5 sites into the SSS Report to ensure a sound plan that was flexible enough to accommodate the markets requirements for facilities across the sub-region. Each authority has previously been asked to provide a full list of potential sites, including allocations for other uses. MEAS added further sites to this list from desktop study and discussion with operators and the MWDA (Merseyside Waste Disposal Authority). MEAS then followed a standard appraisal methodology (documented in the SSS Report, Section 11 page 63) to score the suitability of each site put forward. The sites listed for Halton are considered to be the most suitable for waste uses in the borough, despite having some major constraints. If sites are removed from the shortlist it will be necessary to provide alternative sites to maintain a spread of options and ensure a flexible and sound plan.
- 4.23 There are five sites located in Halton that appear in the Waste SSS report. These sites are in two separate clusters, one cluster on Ditton Road, Widnes and a second cluster on Widnes Waterfront. A distinction is made in site size. Those sites larger than 4.5 ha in area, termed 'Sub-Regional Sites', could house facilities capable of dealing with a significant proportion of waste streams generated in the sub-region. Halton has two sites in this category H2295 and H2309. Sites smaller than 4.5ha in area, termed 'Sites of District Significance', could house facilities capable of dealing with a significant proportion of waste streams generated in individual districts. The merits and shortcomings of each of the Halton sites are considered in the following sections.

Site Ref	Location	Sub Regional Site	Score	Size (ha)	Page in SSS report
H1651	Depot 2, Ditton Road, Widnes	No	9	1.4	100
H1690	Depot 1, Ditton Road, Widnes	No	20	2.2	99
H1875	Site G in Widnes Waterfront SPD,	No	35	3.5	98

	Former ICI Zeneca Site, Tanhouse Lane, Widnes				
H2295	Former Johnson's Lane Landfill Site, Widnes, EDZ	Yes	13	15.2	80
H2309	Site H in Widnes Waterfront SPD Site, Moss Bank Road, EDZ	Yes	18	8.8	79

4.24 For each site the Waste DPD SSS report lists possible waste uses.

#### 4.25 *Top Scoring Sites*

4.26 Question 12.2 (page 73) requests comments on the sites listed in tables 12.3 and 12.4. There are significant deliverability issues with all of the sites listed. These issues may mean these sites are unsuitable for waste management uses and these factors are discussed for each site, in turn, below.

4.27 Question 12.3 (page 77) asks for information on the suitability of sites and waste management uses described in the site profiles contained in the report (pages 79-80 and 98-100). These issues are addressed in the commentary on each site below.

#### 4.28 *Sub-Regional Sites*

Site H2295 known as the Former ICI tip / Johnsons Lane tip. Possible listed uses for this site are as a waste transfer station, re-processor, primary treatment facility, secondary treatment facility, or possibly a resource recovery park. This site has considerable deliverability issues. It doesn't have direct access to the public highway. There are considerable access/ransom issues that could potentially be very difficult and/or expensive to resolve. Development of the site and access would also need to be designed in such a way to allow comprehensive development, with access via all modes on the other land parcels to the south of Moss Bank Road. Depending on the scale of the development it may contribute to traffic capacity issues at various Fiddlers Ferry Road junctions. This site has very significant contamination under laying it. There are accounts of there being radioactive waste on the site. The site may require some very costly further site investigations and remedial works. These issues need to be addressed in advance of any redevelopment, particularly the control of leachate, contaminated with a range of organic compounds, and the assessment of the presence of low level radiologically contaminated material. The description in the SSS Report is wrong as there is a watercourse running through the site

(Johnson's Brook) and the vegetation is best described as poor quality scrubland with stands of birch trees. There are mature poplars on the eastern boundary and in addition there are areas of exposed waste across the site. The site is currently the subject of an investigation by the Environment Agency and it is likely to be designated a 'special site' due to the high levels of contamination and the risk to controlled waters (the Mersey). The EA are investigating the site under the contaminated land regulations on behalf of the Council. The outcome of that investigation is likely to require the appropriate persons to undertake further works that may include remediation. The site is well removed from residential areas and other receptors for possible nuisance issues. Although the Council agrees with the selection criteria and methodology used to select the site, the deliverability issues are of such magnitude that this site may be undeliverable.

Site H2309 known as Site H in Widnes Waterfront SPD Site, Moss Bank Road, EDZ. This site comprises a large area of vacant land and is the former ICI Pilkington Sullivan site plus some of the former ICI tip site above (H2295). Possible listed uses for this site are as a waste transfer station, re-processor, primary treatment facility, secondary treatment facility, resource Recovery Park, or a land raise site. The Council has undertaken site investigation, however, likely further work includes environmental impact assessment and also the monitoring of ground water probably over a year (EA condition) if development is to be bought forward. The Council went out to a number of remediation specialists to get estimates of the remediation costs of this land and from these it is believed that the cost will be in the region of £8.5 million. More recently the Council undertook some site investigations on part of Widnes Warth owned by the Council to locate a new art piece, however, the investigation uncovered further contamination which is very similar to that discovered on this site. The most probable explanation is that this off site contamination is coming from the Pilkington Sullivan (H2309) site and is discharging into the River Mersey via this site. Therefore this site has some considerable contamination issues, which will need to be resolved before development can take place. Another key issue is access with the site not directly accessing an adoptable highway. Currently the site is accessed through a 'blue gate' and there are understood to be restrictions on the use of this as an access point. A number of road improvements will be required in any proposed new road layout, for example, traffic lights to control the junction with Gorsey lane. Land is likely to be required to improve the visibility at the junction to the east and west of the entrance. Development of the site and access would need to be designed in such a way to allow comprehensive development, with access via all modes on the other land parcels to the south of Moss Bank Road. Depending on the scale of the development it may contribute to traffic capacity issues at various Fiddlers Ferry Road junctions. In summary, as the site is a former heavy chemicals manufacturing plant that operated for in excess of 100 years the land has significant contamination issues related to both organic and inorganic compounds impacting groundwater and surface water features.

Considerable further work is required to assess the full impact of the residual contamination and the effects on any future development. Preliminary estimates of remediation costs are high. The site is well removed from residential areas and other receptors for possible nuisance issues and is a significant derelict site that has been disused for over 15 years and will continue to be major environmental hazard unless redevelopment tackles the site. Although the Council agrees with the selection criteria and methodology used to select the site, there are significant deliverability issues. Any development would need to be designed to blend into this waterside location and be in conformity with the principles contained in the Widnes Waterfront SPD. A land raise site would not be supported.

#### *4.29 Sites of District Significance*

4.30 Site H1651 (Depot 2, Ditton Road, Widnes). The site description given in the SSS Report is slightly incorrect. The identified site covers at least three current businesses, MJ Burns (metals recycling), Halton Community Transport and part of Feralco (water treatment chemicals manufacture). Possible uses listed for this site are a household waste reception centre (HWRC), waste transfer station (WTS) or re-processor to process recovered recyclable materials. Development of this site would raise potential highways issues relating to queue management (vehicles queuing for access on Ditton Road, causing blocking back and potential shunt accidents). There is also a problem with the standard of access for an intensification of use involving heavy vehicles - poor radii, visibility and junction spacing. These highway concerns are likely to be all the more of an issue during the construction of the Mersey Gateway and potentially thereafter. The Council agrees with the selection criteria and methodology used to select the site. However, a HWRC is unsuitable due to highways issues. Suitable highway safety measures need to be accommodated into the road network to enable the site to be considered deliverable for other waste management uses. Uses also need to be compatible with the Strategic Rail Freight Park (3MG).

4.31 Site H1690 (Depot 1, Ditton Road, Widnes). Possible listed uses for this site are a waste transfer station (WTS) or re-processor to process recovered recyclable materials. This site is adjacent to a key gateway to the borough and also opposite a site with permission for a hotel (the site to the north). There are ongoing efforts to try to ratify the accesses in the vicinity, as there is a problem with access to the site to the west, due to the close proximity of existing accesses. Another consideration is the provision of a right turning lane into the proposed Hotel site opposite and how this will relate to access into an intensification of use of this site. The Council has concerns that intensification of this site for waste processing may lead to excessive numbers of HGVs needing to turn into the site and the queuing space on the road network not being available to accommodate this safely. Any development is likely to contribute to traffic capacity issues. These highway concerns are likely to be all the more of an issue during the construction of the Mersey Gateway and

potentially thereafter. The Council agrees with the selection criteria and methodology used to select the site. However, there are significant highway issues that would need to be mitigated. If the highway concerns could be overcome, any facilities would have to utilise high quality design and be totally enclosed within a warehouse with appropriate airborne odour and noise containment and in affect offer overall environmental benefit to the area. Uses also need to be compatible with the Strategic Rail Freight Park (3MG).

- 4.32 Site H1875 known as Site G in Widnes Waterfront SPD, Former ICI Zeneca Site, Tanhouse Lane, Widnes. The site directly fronts the Canal, Transpennine Trail and the Local Wildlife Site that is the saltmarsh. Possible listed uses for this site are waste transfer station, re-processor to process recovered recyclable materials, primary treatment and secondary treatment. The actual site boundary is slightly different to that shown in the Waste DPD plan due to a land swap and this requires amendment. This site has significant constraints that seriously impact this sites deliverability. The site suffers from contamination and has a number of service constraints with electrical cables and above ground services crossing from the Saffil's site and sub station. It is likely that the cost of diversion will be significant cost to the development. This site is adjacent to a site (the Routledge site) that has a Council resolution from 2005 to grant planning permission subject to a Section 106 agreement for a mixed use development, which includes housing. This site is to the south of a new office development at the Safils plant. The Highways Authority advice is that appropriate improvements need to be made to Tanhouse Lane (for example, alignment, cycle tracks etc - which would ultimately lead into the EDZ boulevard). Any development of the site and appropriate access would need to be designed in such a way to allow comprehensive development, with access via all modes on the other land parcels to the south of Moss Bank Road. Depending on the scale of the development it may contribute to traffic capacity issues at various Fiddlers Ferry Road junctions. Although the Council agrees with the selection criteria and methodology used to select the site, there are significant deliverability issues. The Council regards the proposals as out of character and incompatible with the proposals contained in the Widnes Waterfront SPD.

#### *4.33 Sites on Widnes Waterfront*

- 4.34 There are some general observations on sites within the Waterfront. Two of the sites lie within the area defined as the Widnes Waterfront EDZ and the third (H2295) is adjacent to, but outside the EDZ. These potential sites are considered as being unsuitable, as the introduction of waste and similarly type uses would undermine the Councils regeneration ambitions for the Waterfront. The sites are all also close to the alignment of the Mersey Gateway and will post construction be very visible thus demanding a particularly sensitive or even positive treatment Throughout the area there is also a known power supply issue with substantial investment required to deliver a new primary sub-station and

a reinforced supply. Sites H2309 and H2295 both have significant contamination problems and have lain derelict for a considerable period of time.

- 4.35 If these considerable constraint and considerations could be overcome and be addressed then there may be opportunities to see the sites developed. Private sector interest in the three waterfront sites could deal with the environmental liabilities of the site, generate jobs, remove difficult owner involvement, and allow the Council to seek conditions through planning applications that would see the sites properly equipped for operation and restored. In the case of site H2295 this would include restoration of the site as public open space as per the Widnes Waterfront SPD & UDP. Site H2309 has been described in the Widnes Waterfront SPD as suitable for B2 use, therefore a well designed, modern end use would not be out of place with ambitions for this area
- 4.36 The areas in which the above sites are located are characterised by existing contamination and surrounded by heavy industrial neighbours, in the case of Widnes Waterfront the presence of Fiddlers Ferry, the Shell Green plant is present. Whilst other property sectors may view these factors negatively the waste sector will be unmoved. Allocation of these sites for specific waste facilities could potentially bring the long-term economic and environmental improvements that the Council seeks without damaging investment confidence. It is acknowledged that the response to the public consultation would need to be carefully worded to ensure only the 'suitable' waste uses on each sites and also that there is no safeguarding policy on the allocations to prevent a better offer being realised.
- 4.37 The need for further technical assessment and search for landfill and land raise
- 4.38 Whilst landfill and land raise is not strictly the subject of this consultation in terms of proposals and suggested sites, some information has been presented with respect to the technical work that needs to be undertaken to establish whether Merseyside and Halton offer any potential for new landfill and land raise. Only 3% of consultees wanted Merseyside and Halton to continue to export waste to other areas for landfill. Also 97% of consultees wanted the sub-region to move towards self-sufficiency for sustainable waste management. The most significant need will be for non-inert landfill as inert material can more easily be reprocessed and re-used e.g. landscaping, road construction, site preparation, engineering works, and concrete block manufacture.
- 4.39 Planning policy requires Merseyside and Halton to undertake a robust assessment of this issue and the public need to be given ample opportunity to comment. This is why the on-going work on landfill and land raise is being presented at this juncture – it provides an opportunity for further discussion as the Waste DPD is advanced.

4.40 Consultation question 12.4 seeks views on opportunities for landfill and land raise on the sites listed in Appendix D (page 157). The Council feels the inclusion of sites EAS0355 and EAS0107 are inappropriately listed here and should be removed. These sites are historic chemical tips with existing environmental problems that the Council is striving to tackle. The land uses and infrastructure of these areas will no longer accommodate landfill or land raise. There are significant environmental designated sites close to these sites (the Mersey RAMSAR) and the Liverpool John Lennon Airport Safety Zone policy would veto landfill / land raise to the risk flocks of birds, attracted to these types of waste site, present to landing aircraft.

#### 4.41 Other Issues

4.42 Consultation question 12.5 (page 135) seeks views on whether sub-regional sites (those greater than 4.5 hectares in area with some limited safeguarding of smaller sites) is the preferred option to ensure that Merseyside and Halton has sufficient certainty to cater for future waste management requirements to 2025.

4.43 The Council feels that all sites should be subjected to a review after each 5-year period of the plan passes. At this review point, if there is no need for the waste facilities proposed on these sites, they should be released for uses other than waste.

4.44 Question 12.6 simply provides consultees with an opportunity to make any wider observations they have on the Spatial Strategy and Sites Report. The Council has no further comments to add in response to this question.

## **5.0 OTHER IMPLICATIONS**

5.1 There are no 'other implications' for consideration.

## **6.0 IMPLICATIONS FOR THE COUNCIL'S PRIORITIES**

### **6.1 Children and Young People in Halton**

6.2 This report has no direct implications for children and young people in Halton. Indirectly, the Waste Development Plan Document (Waste DPD) places sustainability at its very core, protecting valuable resources for future generations and promoting the most sustainable methods of waste handling and treatment.

### **6.3 Employment, Learning and Skills in Halton**

6.4 The sites eventually allocated through the Waste DPD process will provide economic opportunities, including potentially 500 – 1000 jobs direct in the waste sector, with a much greater number through indirect employment such as the reprocessing sector and social enterprise.

## **6.5 A Healthy Halton**

6.6 There are concerns about environmental nuisance, odours, emissions and the effects that waste facilities may or may not have on the health of residents. The Spatial Strategy and Sites Report have been supported by an independent review of this matter. Scientific and medical consensus is that there are no direct health issues arising from the normal operation of modern waste facilities. However, there is little scientific research and experience relating to advanced treatment technologies upon which to draw any firm conclusions with respect to health issues. The Waste DPD does push waste up the waste hierarchy and encourages the use of more efficient and precautionary technologies.

## **6.7 A Safer Halton**

6.8 The main implication, aside from the health aspects noted above, is the consideration of increased traffic movements in the vicinity of any developed site.

## **6.9 Halton's Urban Renewal**

6.10 A great deal of effort has been directed by the Council into change perceptions about Halton that stem from its industrial legacy. A prime concern is the impact on inward investment in the Borough. Waste facilities must be designed to a high standard of quality and mitigate against all environmental nuisance that is associated with waste facilities.

## **7.0 RISK ANALYSIS**

7.1 Due to pressing timescales for the preparation of a Single Regional Strategy, the increasing number of private sector planning applications for waste treatment facilities, the urgent progress needed with the Merseyside Waste Disposal (MWDA) procurement process and the pressing need for Merseyside and Halton to secure new infrastructure for sustainable waste management it is vital that rapid progress is maintained with the Waste DPD. Advancing the Waste DPD to a stage where it can start to influence planning decisions will greatly assist the Districts in making those decisions.

7.2 Delay to the Waste DPD will:

- Increase costs to the Districts in the future through the cost of landfill disposal and financial penalties.
- Reduce Merseyside's ability to influence the waste policy content of the emerging Single Regional Strategy.
- Have a knock on effect of Waste DPD project timescales with resultant increases in costs of plan preparation.

- Potentially have a knock on impact on the MWDA planning and procurement processes by increasing uncertainty.
- Have very serious implications for the soundness of each of the District emerging Core Strategy documents.
- Result in a continuation of an industry-led approach to the location of new waste facilities rather than the pro-active plan-led approach proposed within the Waste DPD.
- Reduce the Council's ability to resist applications of the wrong type and in the wrong places

7.3 These risks are mitigated by a monthly review of all significant risk factors highlighted by the project's risk assessment.

## **8.0 EQUALITY AND DIVERSITY ISSUES**

8.1 An Equality Impact Assessment has been prepared for this project and is available at [www.wasteplanningmerseyside.gov.uk](http://www.wasteplanningmerseyside.gov.uk). Where appropriate, action has been taken on the findings of the Equality Impact Assessment.

## **9.0 REASON(S) FOR DECISION**

9.1 To respond to consultation which forms part of the statutory process for the formulation and development of Development Plan documents.

## **10.0 ALTERNATIVE OPTIONS CONSIDERED AND REJECTED**

10.1 There are no alternative processes available. If not followed the Plan making process would be un-sound.

## **11.0 IMPLEMENTATION DATE**

11.1 The response is required by the 16<sup>th</sup> January 2009.

## 12.0 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972

<b>Document</b>	<b>Place of Inspection</b>	<b>Contact Officer</b>
The Halton Council, Liverpool City Council, Knowsley Council, Sefton Council, St Helens Council and Wirral Council Joint Waste Development Plan Document Spatial Strategy and Sites Report.	<a href="http://www.wasteplanningmerseyside.gov.uk">www.wasteplanningmerseyside.gov.uk</a> or Rutland House, Halton Lea, Runcorn.	<b>Tim Gibbs</b>