



**MERSEYSIDE WASTE DISPOSAL AUTHORITY**

**Merseyside Waste Disposal  
Authority**

**Consultation Response to  
the Merseyside Joint  
Waste Development Plan  
Document**

**Spatial Strategy and Sites Report**

**January 2009**

**APPENDIX ONE**

## **Summary of Specific Comments**

1. All Sites Review: The Merseyside and Halton Waste Partnership's requirement for sites for large MSW residual waste treatment is for two sites greater than 8.0 hectares. Based on the MSW waste arisings – it would be beneficial to locate such facilities within the vicinity of the intersection of the A580 and M57 and the intersection of the M57 and the M62.
2. All Sites Review: In order to be clear about the site boundaries identified in the WDPD sites database, the Authority formally requests that details of the 'red line' boundary lines of all sites are provided as part of the public consultation response by the Waste DPD team.
3. All Sites Review: The Authority has submitted to the Waste DPD team details of all sites currently being considered for municipal waste management treatment, in order to correlate these sites with the Waste DPD processes and to assess how well they score. This will be to ensure that sites are considered by the Waste DPD process and for the Waste DPD team to respond back to MWDA on their performance based on the DPD methodology.
4. Broad Sites Search Report: Details of the Authority's current preferred sites for potential new HWRC capacity have been submitted to the Waste DPD team, to ensure that any new sites are assessed and included in the Waste DPD database

## Detailed Commentary - Waste DPD Spatial Strategy and Sites Report

### GENERAL COMMENTS ON WHOLE DOCUMENT

<b>Document Reference</b>	<b>Comment</b>
General	The document regularly refers to the Joint Municipal Waste Management Strategy (JMWMS) being promoted by MWDA and fails to emphasise that it is a jointly owned document by MWDA and the five Merseyside District Councils all of which have politically approved and agreed the Strategy.
General	Climate change issues, regarding sites, e.g. proximity to potential climate change hazards could be given more focus to reflect these concerns e.g. flooding risk, potential land instability, potential disruption to access to facilities, etc through the development of local climate impact profiles.
General	MWDA request clarification on the nature of the consultation with the Merseyside District Councils and Halton District Council regarding the production of the sites database in the Spatial Strategy and Sites Report. Clarification should be provided on the reasons for sites inclusion and exclusion and the criteria used to exclude individual sites from the beginning of the WDPD production process to the present time.
General	In the list of sites the practicality of the sites has not been adequately considered. Some sites in the list would not be viable facilities due to the local road infrastructure (access and egress difficulties for example). Please explain in detail the planning deliverability assessment that has been applied to sites.
General	What is the policy decision/precedent behind the presumption for 'no mass burn'? Could you please explain the provenance of any policy and refer to the record of the policy decision.
General	District council consultation – what was the result of this round of consultation? Which sites were taken in or out at this stage as a result of the consultation and why?
General	Climate change issues within the WDPD spatial strategy: The WDPD should consider heat and energy synchronisation or the location of heat energy users other than 'industrial estates' in their selection process – i.e. large manufacturer
General	MWDA questions whether sites that are in the planning process or already have planning consent (e.g. Ineos Chlor) should effectively be ignored by the Waste DPD process?
General	Liverpool John Lennon Airport is mentioned throughout the document, but no reason as to why is given. Please explain.

General	Various targets are referred to as acceptable through the document – who are these figures acceptable to? What consultation was carried out with regards to these?
General	Please clarify in detail the next stage of the public consultation process.
General	<p>Comments could be made regarding the Community Infrastructure Levy (CIL) approach which could potentially support:</p> <ul style="list-style-type: none"> <li>➤ The principle of communities taking responsibility for their own waste i.e. support for waste infrastructure in/close to the community;</li> <li>➤ Climate change mitigation – re. District heating CHP schemes and local facilities to minimise transport impacts re: Section 10 on climate change and energy security</li> </ul> <p>The documents make no reference to these proposals and perhaps it should. The Act will be implemented in 2009 and with further consultations taking place about the type of infrastructure, could impact on the DPD.</p>

## SECTION 4 – Planning for waste in Merseyside and Halton

4.2 PAGE 18	Although Halton is a member of the Merseyside and Halton Waste Partnership (MHWP), the document fails to recognise that Halton is a Waste Disposal Authority with its own statutory municipal waste management strategy Halton Municipal Waste Management Strategy (HMWMS). Although aligned with the JMWMS, Halton has different targets and different LATS allowancesThe document also needs to acknowledge Halton’s involvement in the Merseyside and Halton Waste Partnership procurement process – which procurement process.
4.43 PAGE 18	For continuity, the document should say ‘Joint Municipal Waste Management Strategy for Merseyside’
4.41 / 7.4 PAGE 18 PAGE 31	Regarding landfill diversion targets the document should refer to ‘penalties’ not ‘fines’
4.45 PAGE 19	Does not refer to HMWMS, just the aims and objectives for JMWMS.
Picture 4.1 PAGE 20	Diagram does not clearly recognise possible recycling of residual ash or street sweeping recycling – what does this refer to?
4.48 PAGE 20 Picture 4.1 PAGE 20	Fails to show residual waste may go directly to thermal energy recovery or other ‘secondary’ treatment plant. <b>In such cases, EfW treatment is ‘primary’ treatment.</b>
4.49/Table 4.3 PAGE 21	The WDPD should consider the final report on Nationally, Regionally and Sub Waste Strategy - Regionally Significant Waste Management Facilities (August 2008 4NW) with regard to demands and pressure for new waste management capacity.
4.49 PAGE 20	Agree with statement but report fails to recognise it is not always economical or practicable to recycle all waste and therefore there is also insufficient secondary treatment capacity to meet the sub-regions needs.
4.49 Table 4.3 PAGE 20	Sorting and Separation. Does ‘Expand role municipal Waste Transfer Stations to include recycling’ mean the site or the building? A Waste Transfer Station serves a different need to a recycling plant and the two are exclusive, although it may be possible to include recycling or other treatment on same sites as WTSs,

	<p>Sites housing WTSs could be reconstructed as recycling facilities, but unlikely to simply involve the re-use of the building.</p> <p>Primary treatment likely to be delivered by MWDA, but not strictly only as part of the waste contract procurement which is for larger primary and/or secondary treatment facilities. It would be better to simply use waste contract procurements and drop reference to PFI (which is simply the method of funding and therefore irrelevant in the context of the DPD)</p>
4.43 Table 4.1 and Table 4.2 PAGE 18 and TABLE 19	MWDA to supply Waste DPD with data for proportion of waste diverted from landfill
4.50 PAGE 21	'Some of the local authority Waste Transfer Stations, (WTS's) need to be reconfigured...' see comment 4.49 above
4.52 PAGE 22	Reference to 'Single Mechanical Heat Treatment Facility' – text should highlight that the facility is a Demonstrator Facility with a set operational duration
4.53 PAGE 22	<p>The Waste DPD states that it is not contemplating the development of 'mass-burn incinerators' and later in same paragraph, 'will not support facilities that do not generate energy'</p> <p>Where does policy decision not to contemplate mass-burn come from? How exactly does the DPD define mass-burn? Clarification needed in DPD. There are 'mass-burn' techniques which generate energy, i.e. they do not alter residual waste before treatment. Is the intention to draw the distinction between thermal processes which recovery energy and thermal treatment processes which do not recover energy? If so, this should be explicitly stated. <b>MWDA supports thermal treatment with energy recovery.</b></p>
4.55 PAGE 22	Clarification is sought on the statement 'MSW landfill is contracted to a single site in north Wales to which waste is exported', MSW does not go to this site from Merseyside
4.6 Table 4.4 PAGE 23	<p>Does not include any estimate of the gap in secondary capacity, or more correctly EfW capacity (which could be called primary) required for MSW and Commercial and Industrial waste.</p> <p><b>MWDA require 450,000 tonnes/year capacity by 2015 for MSW, which could involve MBT primary treatment stage, or not. According to the capacity table, this would equate to the third largest</b></p>

	<b>capacity need, if there were no MBT 'primary' stage</b>
Table 4.4 PAGE 23	Table is based on MEAS estimates, MWDA and other organisations would be able to supply this data

## SECTION 6 – Issues addressed by the Waste DPD

6.1 PAGE 26 PAGE 27	This is a fast changing agenda (see DEFRA Climate Change Strategic Framework) with higher national targets being agreed (Climate Change Act 2008/Energy Act 2008/Planning and Energy Act 2008)) and sub Waste Strategy - regional and district climate change action plans being developed. The WDPD must also address adaption to climate change not just mitigation.
6.4 PAGE 26	Climate change is a key driver for waste management (including the Landfill Directive, Waste Strategy for England 2007 and the JMWMS 2008).
6.5 PAGE 26	Needs to recognise the carbon impacts of the different waste treatment options, the recycling of different materials and the potential carbon benefits.
6.12 PAGE 27	Evidence base not just global – UK Climate Impacts Programme established in 1990 and about to publish new scenarios for 2009. Guide to North West Greenhouse Gas Emissions Inventory and proposed Carbon Reduction Targets (NWRA 2007); Rising to the Challenge NW Climate Change Action Plan 2007, Waste Strategy – 09 (NWDA); Assessment of Potential Carbon Savings Achievable in the NW (4NW Nov 2008); Mini Stern project in development through Mersey Partnership with Phase 1 to be completed March 2009. This paragraph section says little on energy security/renewable obligations/carbon commitments.

## SECTION 7 – Vision and strategic objectives

7.3 PAGE 30	Need to reflect the changes to the waste hierarchy from the adoption of the revised European Waste Framework Directive, which will need to be transposed into UK law within the next 2 years. 'Reduce' is replaced by 'prevention' and there are detailed annexes regarding activities falling under recovery and disposal.
7.4 PAGE 31	Waste Prevention Strategy for Merseyside 2008 (JMWMS Supplementary Report 1 not referred to). Under 'Waste Strategy - use' refer to Household Waste <i>Recycling</i> Centres, as opposed to <i>Reception</i> centres. Ensure this is consistent throughout.  Clarification is needed from the WDPD as to who would own and operate the 'commercial waste reception centres' detailed in table 7.1. An explanation is required within the document as to the differences between commercial and municipal HWRC's and WTS's.
7.7 – 7.9 PAGE 33-34	WDPD Strategic Objectives –need to support the aims and objectives of the JMWMS and HMWMS and be drafted in a way that allows them to develop and respond to the statutory review of these strategies during 2009
7.9 PAGE 34	Human health impacts report - could have been integrated here, an opportunity missed?
Q7.1PAGE 33	The proposed WDPD Vision should reflect the social benefits to Merseyside including new and safeguarded jobs, skills development etc and identify other positive rather than negative impacts. The Vision could also make reference to 'waste prevention' alongside effective resource management to emphasise more strongly the need to move up the waste hierarchy. In supporting the proposed Vision, it is also important to recognise that certain wastes may require specialist facilities located outside of the sub - region.
Q7.2 PAGE 35	SO2 Should reflect waste prevention not just minimisation.  SO5 – Not at a low starting point now particularly on MSW, just slightly below the national average.  SO7 – could be more challenging about taking on board high environmental standards for waste management facilities e.g. BREEAM.  SO8 – needs to include climate change adaptation.

## SECTION 8 – Strategy to meet Merseyside’s waste management needs

8.4 PAGE 36	Acknowledges the Halton position and therefore section 4 is inconsistent. Halton is a member of the Partnership. No decision has been taken as yet to develop future strategies jointly.
8.7 PAGE 36	Statement 8.1 Agree with overarching approach, i.e. a resource recovery led strategy. However, Statement 8.1 does not acknowledge fact that waste may go unprocessed to a heat and power OR power only treatment plant
8.8 PAGE 37	Should this read ‘the overall strategy promoted by the Merseyside and Halton Waste Partnership’ rather than MWDA? Generally, the document fails to identify that the JMWMS is a jointly owned document re. MWDA and the five constituent Merseyside authorities – again these partners could be listed.

## SECTION 9 – Spatial Strategy

Q9.1 PAGE 38	Should also consider potential growth / reduction in waste arisings and the difficulties in forecasting. There may also be significant changes in waste composition over the life of the JMWMS - time of the waste DPD. Sites at risk from climate change impacts should be recognised and emphasised.
9.19 and Appendix A.36  PAGE 42 PAGE 141	MWDA were also representing Merseyside interests for the studies listed and on RTAB.
Fig. 9.1 PAGE 43	Significant tonnages of paper leave the sub -region for - processing at Ellesmere Port and Shotton.  Please explain and clarify this figure
Fig 9.3 PAGE 53	Please explain this figure, the plan is unclear.
9.22 PAGE 44	Refer to waste prevention rather than minimisation. Through the provision of new facilities, a number of Merseyside District Councils have moved to co-mingled collection of mixed dry recyclables, which reduces the need for transport movements. The issue of waste movements is being considered in the proposals for the new Merseyside and Halton Waste Partnership Waste Management Recycling Contract through the use of the Environment Agency's WRATE assessment tool.
9.23 PAGE 44	Is there any information on where the waste residues from pyrolysis are from? MWDA is not aware of any sub - regional / regional pyrolysis facilities.
9.26/9.51 PAGE 44 PAGE 57	Sub regional rail activity appears to have only considered economic costs (not including reducing congestion on roads) and not environmental benefits e.g. carbon impacts. Has WRATE analysis been undertaken? Benefits of water- based transport do not appear to have been significantly addressed.
9.43 PAGE 52	Figure 9.3 identifies only one thermal treatment facility required in Liverpool. Is this correct?  Should make it clear that MWDA do not support this Option based on waste arisings, but rather MWDA support a Resource Recovery led strategy

9.5 PAGE 39	Table 9.2 identifies need for four thermal treatment facilities of between 100-160,000 tonnes/year each. What is the basis of this calculation? MWDA requires 450,000 tonnes/year of capacity (although this might include primary treatment in the form of MBT, it may not).
9.50 PAGE 57	'The strategy provides the private sector and the Merseyside Waste Disposal Authority with maximum available choice to deliver solutions for the identified needs of Merseyside and Halton'. This does not tally with the MWDA strategy of combined facilities requiring eight hectares or greater, 4.5 hectares is too small to deliver this.

## SECTION 10 – Climate change and energy security

Q10.1 PAGE 61	Yes, but not necessarily all as there are smaller scale developments that could benefit from EfW. The DPD process should consider closely the position of the municipal waste management strategies as they evolve in the forthcoming review, regarding carbon / energy issues. The development of a wider sub-regional carbon strategy should also be taken into account as an aligned approach by the DPD / JMWMS could make an important contribution to ensuring a consistent sub - regional approach is agreed and implemented regarding these issues.
10.1 PAGE 59	Targets need updating in line with Climate Change Act, not the Bill e.g. 80% reduction by 2050.
10.8 PAGE 60	MWDA procurement does not exclude other thermal energy recovery technologies coming forward which do not include primary treatment in the form of MBT
10.10 PAGE 60	Suggest delete 'to utilise RDF' to reflect 10.8 above. Agree that Waste DPD should be technology neutral on which type of energy recovery technology, whilst also accepting constraint that will not involve thermal treatment with no energy recovery (i.e. DPD is only technology neutral so long as there IS energy recovery)
10.12 PAGE 60	Reference could also be made to the supportive Health Protection Agency position statement of November 2005.
10.13 PAGE 60	MWDA supports statement re: Encouraging the development of Energy from Waste plants for all major new development. However, in relation to housing development, the DPD would need to recognise constraints on building EFW too close to residential housing, mentioned elsewhere in report, including in the site selection scoring. Building EFW plants too far away from new housing would militate against a CHP District Heating solution, for example, because heat losses and infrastructure costs would decrease cost-effectiveness.
Q10.2 PAGE 62	No – link to residential developments with small-scale CHP schemes plus helps to address fuel poverty issues in areas of multiple deprivation.

## SECTION 11 – Site selection methodology

11.6 PAGE 63	DPD report considers 0.5 hectares to be too small for HWRCs. What is the reasoning behind this? The proposed Holt Lane HWRC was only 0.36 hectares. Ravenhead HWRC is smaller than 0.5 hectares and operates effectively.
11.9/11.17 Q11.1 PAGE 64 PAGE 66 PAGE 67	Concern that the constraints in relation to proximity to housing could prevent the siting of waste management facilities required within or near residential facilities for use by those neighbourhoods as required in the Waste Strategy for England. Integrated waste schemes (HWRCs, recycling on the go, small scale CHP etc beneficial to the local community which reduce specific car journeys and emissions should be a positive value not negative). (Contradicts A26+A27 and still not supported in the analysis at B11)
Table 11.1 PAGE 65	<p>The scoring range identified in this table gives a negative score to criterion such as proximity to hospitals, schools and residential areas. The negative score contradict with comments made earlier in the document (10.7) where it is started that 'residual waste has a potential role to play in this, particularly where its use can benefit either a community, through a community heat and power scheme'. HWRC facilities are required to be close to residential properties as these facilities provide recycling facilities to the general local community and those members of the community that do not have access to private vehicular transport. Also, many hospitals in the UK did have incinerators within their grounds, and CHP could benefit such facilities.</p> <p>The proximity to housing, hospitals and schools should be carried out on a site-specific basis at the planning determination stage so as not to exclude potential site based on general scoring. Also, by examining the table it seems more favourable to have a site located in an area of green belt (range of -15 to -5) than to have a site close to a food processing plant (-50 to -5). The Environment Agency Waste Permit for such a facility would ensure that the facility did not have an adverse effect on nearby developments. Indicative floodplain is also of interest with regards to this.</p> <p>The 'Boundary Range' classifications need to be clarified. Where are the ranges derived from or what is the source of this classification? For example, why are residential areas 0 to 1000m?</p> <p>An explanation of each of the criterion in table 11.1 would be beneficial within the table and not in Appendix E, so as</p>

	to avoid confusion later. However, not all of the criteria in table 11.1, are covered by the Glossary of Terms. Members of the public may not be aware of what the definition of each of the criterion is and there is no guidance within the table.
11.10 PAGE 64	A notional polygon boundary would increase the accuracy of scores as opposed to using only point in the first instance. This may have excluded some sites from the top-scoring sites list.

## SECTION 12 – Listings and profiles for top scoring sites

Table 12.5 PAGE 74	Should read Household Waste Recycling Centre (HWRC) in line with glossary. Also no reference to aerobic windrow or in - vessel composting sites or anaerobic digestion.
12.10 PAGE 70	Tables 12.3 and 12.4 would be more understandable if they were listed in rank order of site score. An explanation as to why certain sites are considered unsuitable for certain waste management uses is required.
12.16 PAGE 73	Please explain why sites have not been scored based on MWDA requirements to meet its waste contract procurement reference case, e.g. sites larger than $\geq 8$ hectares
12.20 PAGE 74	Table 12.5 'Secondary treatment' does not acknowledge that energy recovery may not involve primary treatment stage, e.g. MBT, and may involve the generation of power only (with no heat use)
12.49 PAGE 133	Agree with safeguarding all sites greater than 4.5 hectares with 5 year review  Option Safeguarding 1 looks the same as Option Safeguarding 2. Clarification and distinction as to what is meant to be different between them.
12 – Site profile L1198 PAGE 83	Please explain why is Gillmoss is identified as a larger site potentially suitable for thermal energy recovery, when MWDA have identified the site for an MRF?
Table 12.3 PAGE 70	Sub-regional sites list. Of the 10 sites identified in this list, only four are marked as suitable for secondary treatment. If the six remaining sites are not suitable for secondary treatment then surely it is questionable whether the sites aren't suitable to be large sub-regional facilities?

## **APPENDIX A – Review of Waste DPD progress and Regional Spatial Strategy**

A.1 PAGE 139	MSW waste growth has been fairly static over the last few years. Targets set in JMWMS are for MSW not all waste arisings.
A.6 PAGE 136	Should be 4NW not NWRA.
A33 Waste Strategy - A41 PAGE 140 PAGE 142	Needs updating in line with the timetable for a non - statutory and statutory Regional Strategy rather than Partial Review of RSS.

## **APPENDIX B – Description of site scoring system**

B3 PAGE 143	Homes and schools are not absolute constraints for some waste management facilities e.g. small scale CHP scheme for residential development or school cannot be at least 1km away.
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## **APPENDIX C – Main elements of the Evidence Base**

C20 [AGE 156	Very subjective final sentence given the findings of the commissioned work at 10.12. The impact on health/changes in seasonality of diseases due to climate change is not referred to.
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