

Places for Everyone Representation 2021

<b>Family Name</b>	Morgetroyd
<b>Given Name</b>	Catherine
<b>Company / Organisation</b>	Cheshire West and Chester Council
<b>Person ID</b>	1286840
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Morgetroyd
<b>Given Name</b>	Catherine
<b>Company / Organisation</b>	Cheshire West and Chester Council
<b>Person ID</b>	1286840
<b>Title</b>	JP-S 7 Resource Efficiency
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Minerals</p> <p>This comment relates to the lack of specific minerals policies within the Places for Everyone Joint Development Plan Document (PfE) and the lack of evidence on mineral supply to support the development levels set out in the Plan.</p> <p>Cheshire West and Chester Council (CWaC) consider that the lack of minerals policies and evidence mean that it is difficult to assess whether the Plan is justified, effective and consistent with national policy and therefore whether the Plan is sound.</p> <p>The Local Aggregate Assessment (LAA) for Greater Manchester has not been provided as part of the evidence base for the Plan. As far as we are aware, the latest version of the LAA for Greater Manchester, Merseyside and Halton, and Warrington is the version published in December 2020, incorporating data for the period 1 January to 31 December 2018.</p> <p>The LAA identifies that the sub-region only had one operational quarry during 2018 and consumption rates continue to be significantly higher than sales, placing greater demands on imports to meet the needs of the sub-region. It also identifies that at the end of 2018 total reserves were 1.2 million tonnes and this provides 4.4 years supply based on average sales over the last 10 years. This is well below the landbank of at least 7 years required by the NPPF and minerals provision in the Greater Manchester area is not currently consistent with national policy.</p> <p>Data for the 2019 period is now available and data for the 2020 period may also be available. As such, the LAA should be updated to show the current position in terms of minerals supply.</p>

The CWaC LAA 2021 (based on 2019 data) identifies that in 2019, 22% of sales from CWaC were exported to Greater Manchester, Merseyside, Halton and Warrington. This indicates a strong relationship between these areas and that CWaC is currently a key supplier of sand and gravel to the sub-region.

The growth set out in PfE will result in additional aggregate requirements in the future, but it is not clear to what extent this will increase aggregate demands from surrounding areas, including CWaC. Despite raising minerals as an issue in the response to the Greater Manchester Spatial Framework in 2019, CWaC have not received details of any future anticipated aggregate requirements or whether there are likely to be additional demands placed on the Cheshire area.

CWaC would like to seek assurances that our local authority will not be expected to provide additional levels of sand and gravel in the future to meet increased demands from the Greater Manchester area. If it is not possible to provide these assurances, further discussions will be required to understand the level of future requirements and to assess whether there is any potential for additional provision from outside Greater Manchester. CWaC currently have a 7.58 year supply of aggregates, so there is little additional capacity at the present time.

The National Planning Policy Framework (NPPF) requires mineral authorities to plan for a steady and adequate supply of aggregates by preparing an annual Local Aggregate Assessment and maintaining landbanks for at least 7 years for sand and gravel. It also states that landbanks of aggregate mineral reserves should be used as an indicator of the security of the aggregate minerals supply and to indicate the additional provision that needs to be made in mineral plans.

Paragraph 5.52 of PfE identifies that "The Greater Manchester Joint Minerals Plan was adopted in April 2013" and "annual monitoring of minerals extraction and changes in likely future needs will inform whether and when an update of the joint minerals plan is required, including as a result of the growth in development set out in this plan".

The annual monitoring in the LAA indicates that there is significantly less than the required 7 year supply of aggregates and as such, an update of the Joint Minerals Plan is required. As sales have been lower than consumption, it is anticipated that any updated version of the Local Aggregate Assessment would show that the landbank has reduced further and the additional growth set out in PfE would exacerbate this position. This makes the need for an update to the Joint Minerals Plan even more urgent.

The identified mineral safeguarding areas and areas of search within the Joint Minerals Plan are now likely to be out of date due to additional development in those areas. It is not clear what, if any, potential there is for new sand and gravel extraction within the Greater Manchester area. Additional evidence should be provided to show the areas containing sand and gravel supplies and whether aggregates could be extracted from these sites in future. Given the current lack of reserves, it would be helpful to have a better understanding of exactly where sand and gravel is found in the Greater Manchester area, its quality, the scale and depth of deposits and whether extraction is financially viable in these areas. Some reserves may already have been sterilised by above ground development. It would have been useful to undertake a call-for-sites process to understand whether there is operator interest in any potential sites.

It would be expected that as there are low reserves, high demand and very few areas with the potential for extraction of sand and gravel, it would be even more important to safeguard any areas that do have potential. No information on this has been provided as part of the PfE evidence and it is not clear whether any of the proposed site allocations are in areas containing

sand and gravel reserves and whether prior extraction could be undertaken before the sites are developed. Without this information it is hard to assess whether the strategy set out in the PfE is justified and appropriate.

Without sufficient future supply of sand and gravel it is not clear how the level of development is deliverable over the plan period and therefore whether the PfE is effective. If there is a lack of provision of aggregates within the Greater Manchester area, there will be an increased need to transport aggregates from other areas. This will have implications for carbon emissions and should be factored into Greater Manchester's ambition to be carbon neutral by 2038.

We would like to be a signatory on the Minerals Statement of Common Ground (SoCG). Hopefully production of the SoCG will give an opportunity for further discussions and sharing of information to resolve some of the issues described above. This will also provide the opportunity to deliver effective joint working on this cross-boundary strategic matter. The SoCG also enables the Greater Manchester authorities to commit to preparation of a new Joint Minerals Plan. We have not had opportunity to review the contents of the SoCG yet, so cannot comment on this further at this stage.

Sand and gravel supply is becoming a major issue for the whole of the north-west region and all the authorities in the area will need to work together to ensure that sufficient mineral resources are provided. There are also other major infrastructure schemes within the north-west that will result in high aggregate demands, such as HS2 and the combined impact of these schemes will need to be assessed and considered.

#### Waste

This comment relates to the lack of specific policies within the PfE relating to waste and the lack of waste evidence to support the development levels set out in the Plan.

Cheshire West and Chester Council (CWaC) consider that the lack of waste policies and evidence mean that it is difficult to assess whether the Plan is justified, effective and consistent with national policy and therefore whether the Plan is sound.

It is not clear whether there is sufficient capacity within the Greater Manchester area for recycling, treatment and disposal of waste - including inert waste, household waste and hazardous waste. We appreciate that there are cross-boundary flows of waste, but generally authorities should aim for net self-sufficiency in waste management and disposal.

A Waste Needs Assessment and Waste Strategy have not been provided as part of the evidence base. The lack of data on waste capacity and demand means that the PfE does not seem to have been based on proportionate waste evidence.

The Waste Data Interrogator 2019 indicates that movements of hazardous, non-hazardous and inert wastes are all above the threshold CWaC use for strategic waste movements, both from CWaC to Greater Manchester and from Greater Manchester to CWaC. As such, this is a strategic cross-boundary matter that needs to be covered under the duty to co-operate.

The NPPF identifies that strategic policies should make sufficient provision for waste provision. Paragraphs 5.53 to 5.56 in the PfE refer to waste and there is a policy on resource efficiency, which is welcomed. However, the PfE refers to the Greater Manchester Joint Waste Development Plan, which was adopted in April 2012.

Paragraph 5.56 of the PfE states that "Annual monitoring of waste facility capacity and changes in likely future needs will inform whether and when an update of the joint waste plan is required, including as a result of the growth and development set out in this plan". The Greater Manchester Joint Waste Development Plan Authority Monitoring Report 2019-20 (published

December 2020) concludes that there will be a likely shortfall in landfill provision if Pilsworth is not extended. It also states that "this could require an increase in export of waste to landfill outside Greater Manchester and potentially the North West". The report also identifies in paragraph 7.3 that the majority of new waste developments have come forward on unallocated sites, indicating that the policy is not working and this issue needs to be addressed through a review of the Waste Plan. Given this fact and the major changes to recycling and landfill levels and new methods of re-using, recycling and generating energy from waste that have been developed over the last few years, the Waste Development Plan is likely to require an urgent update.

It would be expected that the development proposed within PfE is likely to result in additional waste flows to other authorities outside Greater Manchester, including CWaC, but this has not been quantified. CWaC would like reassurance that there will not be a significant increase in export of waste to the CWaC area. If it is not possible to provide this reassurance, details of proposed future exports should be provided so that an assessment can be made as to whether this can be accommodated by other authorities. Information should also be provided as to whether the waste provision within Greater Manchester will be sufficient to continue existing levels of imports of waste from CWaC in the future.

It is not clear whether any of the proposed strategic allocations in the PfE will impact on the operation of existing waste management facilities and whether there are plans for the closure of any existing waste management facilities in Greater Manchester. Without the background information described above, it is difficult to assess whether PfE is justified and effective.

If there is a lack of provision of sufficient waste management and disposal facilities within the Greater Manchester area, there will be an increased need to transport waste to other areas. This will have implications for carbon emissions and should be factored into Greater Manchester's ambition to be carbon neutral by 2038.

We would like to be a signatory on any Waste SoCG. Hopefully production of a SoCG would give an opportunity for further discussions and sharing of information to resolve some of the issues described above. The SoCG also provides an opportunity for the Greater Manchester authorities to commit to preparation of a new Joint Waste Plan. We have not had opportunity to review the contents of any SoCG yet, so cannot comment on this further at this stage.

<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The Plan should be based on additional evidence relating to minerals and waste and reference to this evidence should be added into the plan. The Joint Minerals Plan and Joint Waste Plan should also be updated as soon as possible.</p> <p>Preparation of Statements of Common Ground for minerals and for waste will also be helpful.</p> <p>For further details of the evidence required and the reasons for this, please see the previous comment.</p>
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<p><b>Person ID</b></p>	<p>1286840</p>
<p><b>Title</b></p>	<p>JP-H 3 Type Size and Design of New Housing</p>
<p><b>Type</b></p>	<p>Web</p>

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<b>Soundness - Positively prepared?</b>	Sound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Sound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>The policy states that "housing provision to accommodate specific groups, such as students and travelling people, will be addressed through district Local Plans".</p> <p>We would question whether this indicates that the plan is positively prepared and meets the tests of soundness as this approach may result in a delay in provision of the required sites for Gypsies and Travellers. An alternative approach would be to meet these needs through the strategic allocations, which would give more certainty that sufficient sites will be provided.</p> <p>Cheshire West and Chester Council (CWaC) would like reassurance that lack of provision for Gypsies and Travellers within the Greater Manchester area in the short-term will not result in increased demand in the CWaC area.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	<p>The needs for Gypsies and Travellers could be met through strategic allocations, to give more certainty that sufficient sites will be provided.</p>