



**Structural Civil Building
Engineers**

Planning Statement



Project Ref: 216352
Site: Reliance Street, Manchester - HWRC Development
Client: SUEZ Recycling and Recovery UK Ltd
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Date of Report: 08 September 2022

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Document Issue Record

The table below provides a record of document issue and revision history:

Revisions					
Rev	Description	Prepared By	Checked By	Approved By	Date
P1	Preliminary Issue	Matthew Herring	Alyssa Morrell	Michelle Robinson	08.09.2022

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1 INTRODUCTION AND DEVELOPMENT CONTEXT

1.1 Purpose of the Planning Statement

Canham Consulting have been commissioned by Suez on behalf of the Greater Manchester Combined Authority (GMCA) to provide this Planning Statement in support of a planning application for the redevelopment of an existing Household Waste Recovery Facility (HWRC) at Reliance Street, Newton Heath.

The HWRC redevelopment consists of a modernised facility with significant improvements which will reflect on how the site is used by the public and operated by Suez. The improved layout will benefit both public and operational teams. The reuse shop will support the circular economy. A plan of the development can be found in Appendix A and an extract is included below.

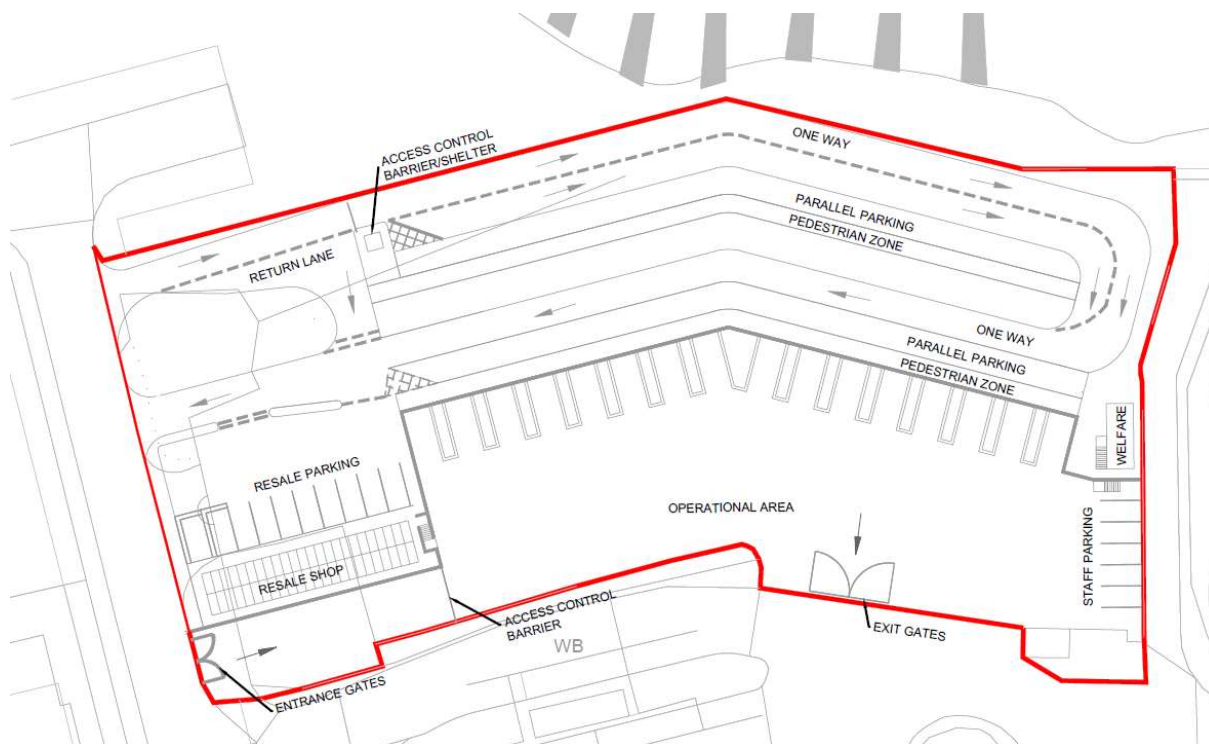


Figure 1: Site Layout

This Planning Statement supports the planning application and details how the impact of the site proposals have been carefully considered in terms of the impact on the surrounding area and demonstrates how the design and operation of the facility will deliver an improvement on the current form.

Suez submitted a planning pre-application to Manchester City Council on 15th December 2021 and received a response on 28th February 2022 (ref JA/DMN see Appendix B). The response concluded that the planning submission would not require an EIA in line with the Town and Country (Environmental Impact Assessment) Regulations 2017. Furthermore, within that response, the following key aspects were noted as needing to be addressed as part of a planning application:

- Visual
- Ecology
- Traffic
- Air Quality
- Land Contamination
- Noise/dust/emissions from the construction and operations of the development

This document provides further detail on each of the aspects listed above alongside the following information contained within this Planning Statement:

- Application form
- Detailed drawings
- Drainage Strategy
- Phase 1 Geo-Environmental desk study
- Coal mining assessment
- Crime impact assessment

The Planning Statement sets out to address each of the aspects outlined above and demonstrates the appropriateness of our approach. The individual aspects are included within the Planning Statement as noted in Table 1 below.

Planning Aspect	Further Detail
Visual	Section 3.2
Ecology	Section 3.3
Traffic	Section 3.4
Air Quality	Section 3.5
Land Contamination	Section 3.6
Noise/dust/emissions	Section 3.7 and 3.5
Odour	Section 3.8 and 3.5
Detailed drawings	See general arrangement, section and elevation drawings
Drainage Strategy	Section 3.9
Phase 1 Geo-Environmental desk study	Section 3.6
Coal mining assessment	Section 3.12
Crime impact assessment	Section 3.10

Table 1: Planning Detail

Beyond the aspects outlined in Table 1 above, we have also included further detail around the site setting and planning policy framework.

1.2 Proposed Development

The application site lies within an area of land owned by Manchester City Council and the majority of the site is operated as a HWRC. The site is positioned at the end of Reliance Street, which sits approximately 5km north-east of Manchester city centre. See Figure 2 below.

The HWRC site is positioned approximately at National Grid reference SD 8805 0106 and covers an area of 0.6 hectares. The wider site is 3.5 hectares and includes HWRC, Mechanical Biological Treatment (MBT) and waste transfer functions. The HWRC site is separate from the wider site positioned to the extreme north-west and benefits from its own entrance and exit onto Reliance Street.

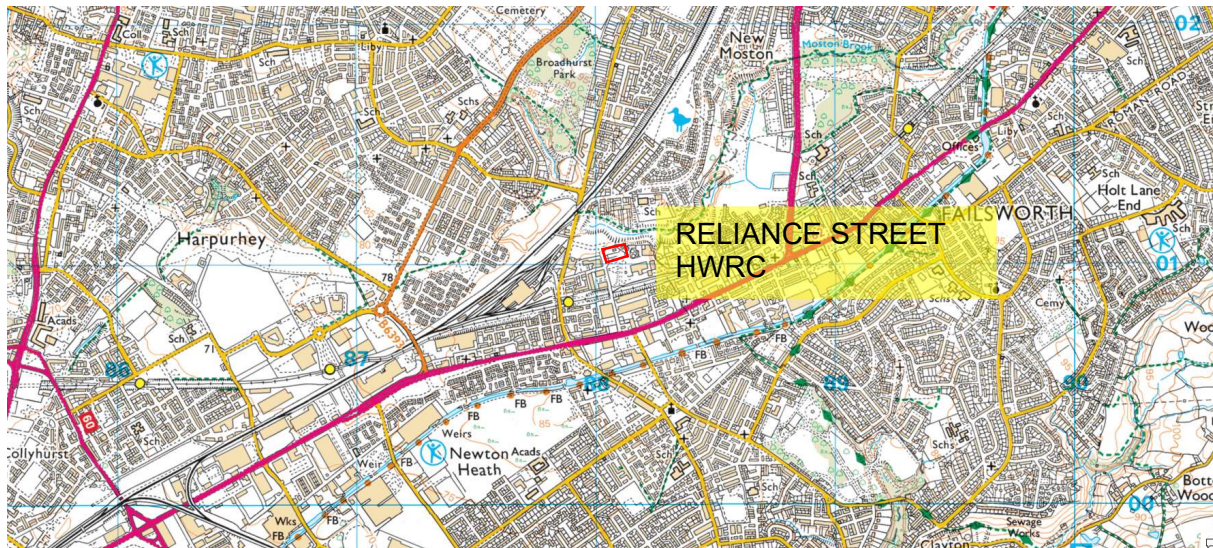


Figure 2: Site Location

The HWRC is primarily surrounded by industrial development with woodland and Moston Brook located to the north and Reliance Street to the west side. Beyond Reliance Street, there is a nursing home/day centre and residential properties beyond that. To the south and east, the HWRC is bounded by the wider MBT and waste transfer site.

Around 100 metres beyond Moston Brook to the north lies Broadhurst Primary School, playing fields, and residential properties which look over Moston Brook towards our site.

There are no designated sites within the footprint of the proposed development or immediately nearby. The Rochdale Canal SAC/SSSI is located just under 1km away to the east but this is to the other side of the A62. Two other areas, The Clayton Vale and Boggart Hole Clough Local Nature Reserves are located over 1km away.

1.3 Site History

Based on historic mapping, the site remained undeveloped through the 19th century and the only feature was a small watercourse to the east side of the site. This was no longer apparent on historic maps from the 1890s, where it appears to have been filled in.

Moving on, there is evidence of clay pits within the site boundary around 1910 and these became larger across the 1922 and 1938 Ordnance Survey maps.

Subsequently, through the 1950s, the site was developed as a timber yard and in the 1980s, the small watercourse was no longer featured on the maps; presumably having been culverted. Alongside this, a waste function was evident on site which included rail sidings to the south side of the site.

1.4 Planning History

The following planning applications have been submitted for the site previously:

- Planning reference 121841/FO/2018 dated 13 March 2019 approved by Manchester City Council. Replacement of existing waste reception building with purpose built Mechanical Treatment and Reception building and associated welfare facilities.
- Planning reference 084335/FO/2007/N1 dated 09/10/2008 resolution approved by Manchester City Council – Authorisation granted for the construction of a new Mechanical Biological Treatment (MBT) facility involving erection of two anaerobic digester (AD) tanks, maturation building, buffer storage tanks, emission stacks, effluent treatment plant, gas holder, back up fare, new vehicle enclosure to Dano plant, and extension/refurbishment of existing household waste recycling centre

- Planning reference 056094/FO/NORTH2/99 dated 20/05/1999 resolution approved by Manchester City Council – Authorisation granted for the erection of a new reclamation plant after demolition of existing buildings. North Manchester MRF Reclamation Plant, Reliance Street, Newton Heath
- Planning reference f/11072 dated 28/11/1979 resolution approved by Manchester City Council – Authorisation granted for a Refuse Treatment Plan, Reliance Street, Newton Heath
- Planning reference F/0856/LA. Recommended by Greater Manchester Council to carry out the proposed development of Greater Manchester Council – Authorisation granted for a Refuse Disposal Plant on land waste of Reliance Street, Newton Heath.
- Reference No. 069108 (20/10/2003) – Permission granted for the construction of storage compounds and retaining walls for the 'reorganisation' (as quoted) of waste materials
- Reference No. 056094 (20/05/1999) – Permission granted for the erection of a new reclamation plant after the demolition of existing buildings
- Reference No. 37581 (31/12/1990) – Permission granted for the refurbishment and continuation of use of the existing civic amenity disposal, recycling and transfer loading facilities and erection of 8m high compound with associated fencing
- Reference No. 34599 (15/08/1989) – Permission granted for the construction of a detached ancillary office

1.5 Existing HWRC

The existing HWRC is a time-served site which is in need of modernisation. The site function is relatively straightforward but does not deliver an efficient turn around of waste or effective recovery of recyclables due to the lack of waste segregation. The waste drop off areas are concentrated on specific site areas which results in significant queueing issues during busy periods. From a health and safety perspective, there is a lack of segregation which can result in issues between the public and operational functions.

Based on the above, GMCA has opted to redevelop the HWRC and modify the operation to ensure that the facility delivers on both functional and environmental aspirations.

1.6 Proposed Redevelopment

The proposed development layout is as shown in Figure 1. The most obvious change to the current facility comes from the fact that the site area will be increased to 0.6 hectares utilising some space to the north of the site and wider areas of site to the east. This will deliver an expansion of the current facility which will deliver multiple benefits from a public and operational point of view. Some of the features of the design are as outlined in the paragraphs below.

1.6.1 Reducing Impact on Reliance Street

The proposed development has been designed to ensure efficiency of movement from both public and operational perspectives. From a public point of view, this means provision of separate entrance and exits off Reliance Street and provision of double lane width around the one-way system. This, alongside clear wayfinding will deliver a readily understood layout which will result in efficient movement of vehicles around the site to reduce congestion on site and ensure the throughput of vehicles from Reliance Street.

Operational vehicles will be able to access the site through a separate entrance off Reliance Street. This will take the pressure off the existing site access which serves the wider site. Once on site, these vehicles will be able to move one-way around the operational area and then join the flow of vehicles on the wider site. Again, this keeps the traffic away from Reliance Street.

1.6.2 Waste Recovery

Currently, all waste is dropped over a wall on site where it is collectively bulked before being loaded on to an articulated vehicle before being taken away from site and processed. In the

developed scenario, the waste will be segregated into the individual waste streams at source. This function will make a significant improvement to material recovery.

1.6.3 Health and Safety

This will serve to provide greater separation between public and operational traffic and traffic flows on the wider Reliance Street site. The public will use a well understood and logical one-way clockwise layout which will appropriately signposted to facilitate ease of use. Operationally, vehicles will service containers within individual bays and allow bays to be closed off during this process whilst public site use carries on. This will be an improvement on the current scenario where waste piles are serviced on an ongoing basis.

Signage will be a fundamental part of the design and will ensure clear and concise health and safety information alongside wayfinding provision. Both will serve to ensure safety of the site users, operational staff and public alike.

1.6.4 Improved Welfare

A pre-fabricated welfare building will be provided for staff on the site and will deliver important amenities for the site staff. Provision of kitchenette and WC facilities will allow site staff to work in comfort and deliver on their welfare requirements.

1.6.5 Reuse Shop

The reuse shop will be provided on site to support the circular economy and deliver the community benefit of the sale of refurbished or second-hand items. This will support the use of the site, avoid landfill of waste materials and support the intent of the waste hierarchy.

1.6.6 Drainage Improvements

As presently, the site would be connected into the existing mains system for surface water runoff, foul drainage and utilities however significant improvements are being made to ensure that the design embraces the recommendations of The SuDS Manual.

1.6.7 Environmental

The site design will be delivered to ensure provision on environmental benefit, through SuDS provision and soft landscaping on the site itself and through provision of landscaping enhancement on the wider Reliance Street site to deliver a clear improvement to the current scenario.

1.6.8 Opening Times

Operating hours would remain unchanged from the existing operation; the facility would operate 12 hours per day (8am to 8pm), 7 days a week.

1.6.9 Throughput

The site is anticipated to enable a throughput of approximately 15,000 tonnes of waste per annum. This is essentially the same throughput as at present but is not intended as a maximum figure.

1.6.10 Site Security

Site security would include modern CCTV and external site lighting designed to ensure efficiency of use and function alongside avoiding impact beyond the site perimeter.

2 PLANNING POLICY

This Section details planning and regulatory context applicable to the Proposed Development.

2.1 Legislation

The context for waste planning in England comes from the EU Waste Framework Directive. The Directive requires Member States to take appropriate measures to encourage the recovery of waste by means of recycling and re-use, whilst ensuring that waste is treated and disposed of without endangering human health or causing a nuisance or harm to the environment.

2.2 National Waste and Planning Policy

There are a number of considerations that can be material to the determination of a planning Application as outlined below.

- National Waste Management Plan for England (2013);
- National Planning Policy for Waste (2014); and
- National Planning Policy Framework (2018) and accompanying National Planning Practice Guide.

2.3 The Development Plan

The statutory Development Plan constitutes the most important policy context for the site. If comprehensive and up-to-date, it is important for development proposals to conform to the policy requirements of the following adopted Plans:

- Residual Policies of the Manchester Unitary Development Plan (UDP) (1995)
- Greater Manchester Joint Waste Development Plan Document (DPD) (2012)
- Manchester's Local Development Framework Core Strategy DPD (2012)
- Guide to Development in Manchester Supplementary Planning Document (SPD) and Planning Guidance (2007)

The following sections will look at the individual aspects of the design and outline how each of these deals with the planning policy relevant to the site development.

3 DESIGN ASPECTS/PLANNING POLICY

In the following Section, we detail how our design responds to the Screening Response produced by Manchester City Council and the relevant parts of planning policy as outlined in Legislation, National Waste and Planning Policy and The Development Plan.

3.1 General

3.1.1 National Waste Management Plan for England (2013)

This Planning Statement responds to the country's obligations in respect of the EU Waste Framework Directive. The requirements are detailed at a national level however need to be considered locally with respect to Reliance Street HWRC.

The Waste Framework Directive seeks to establish an integrated and adequate network of waste disposal installations that *"must enable waste to be disposed of, or be recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health"* and Reliance Street HWRC as part of the wider site clearly delivers this.

Planning policy for waste delivers sustainable waste management through enabling appropriate provision of waste management facilities of the right type, in the right place and at the right time. Reliance Street HWRC clearly delivers this as existing but the redevelopment will help to ensure the continuity of this delivery but in a more efficient and sustainable form compared to existing.

The redeveloped Reliance Street HWRC site delivers on the requirements as outlined above. We will be able to deliver the same throughput as existing but in a manner which impacts less on the surrounding area enabling a more efficient and less obtrusive operation.

3.1.2 National Planning Policy for Waste (2014)

The National Planning Policy for Waste outlines the need to appropriately handle waste whilst fully considering the following key aspects:

- '- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy.....*
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities*
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle*
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment.....*
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste'.*

Reliance Street HWRC will deliver on each of the requirements listed above. Through delivery of a more efficient design and greater segregation of waste at source, Reliance Street HWRC can better handle the anticipated waste flows and through recovery of more waste streams, fundamentally reduce the quantity of waste disposed to landfill. The safe design of the site, more streamlined flow of traffic and amenity provided will make the HWRC a facility which locals will want to use serving Newton Heath and more widely, east and central Manchester.

3.2 Visual

Within the Pre-Application response, the following requirements were outlined:

'Visual - consideration of the impact of the proposed development on the surrounding street scape/visual amenity is required. The development can suitably mitigate against any harm from the scale of the development by being well designed and use of high-quality materials and detailing;'

Furthermore, Manchester's Local Development Framework Core Strategy DPD (2012) policy DM 1 – Development Management, seeks *'Appropriate siting, layout, scale, form, massing, materials and detail'* and *'Impact on the surrounding areas in terms of the design, scale and appearance of the proposed development. Development should have regard to the character of the surrounding area'*.

Our design can be seen on the visualisations provided as part of the application. The present site includes anaerobic digester towers and the operation involves bulk waste being handled into articulated vehicles for onward transfer. At the site entrance and to the east side of the site, we will deliver soft landscaped areas which will serve to benefit the site biodiversity. Our design will be a significant improvement on the current provision; delivering a less obtrusive appearance, more dynamic movement of materials having been segregated at source and a more efficient traffic management resulting in less queuing on Reliance Street, thereby delivering a clear benefit and reduced scale when compared to the surrounding streetscape.

3.3 Ecology

Within the Pre-Application response, the following requirements were outlined:

'Ecology – Whilst it is considered that there will be limited impact on the ecology on the site, an ecology report should be prepared which considers impact on vegetation and habitats. Any suitable mitigation should be incorporated into the scheme including no site clearance during sensitive nesting and breeding seasons, biodiversity improvements including plan and bat and bird boxes;'

Furthermore, the Greater Manchester Joint Waste DPD Paragraph 1.26, Objective 7 requires the developer *'To protect and where possible enhance the sub-region's natural environment, biodiversity, geodiversity, cultural and historic heritage.....'*

Equally, Section 15 of the NPPF outlines the relevant planning policy in relation to the natural environment. It emphasises the need to *'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries'*. Later in the Section, the document identifies what local planning authorities should consider in terms of biodiversity when considering planning applications:

- *'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused...*
- *...development resulting in the loss or deterioration of irreplaceable habitats.....should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *... opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity'*

As part of our redevelopment of the Reliance Street HWRC, we recognised that to benefit the site function from a public perspective, it would be beneficial to expand the site beyond the current northern boundary; as such, we have included just under 850m² area to the north within our proposals. In doing so, given the present function of this area as woodland (approximately 700m² of the 850m² overall area), we recognise the need to undertake ecological surveys of the area

and as such, commissioned an Ecological Appraisal and Biodiversity Net Gains Assessment (BNG) included within the planning submission.

The conclusions from the Ecological Appraisal suggested as follows:

'.....no statutory or non-statutory nature conservation designations are present within or adjacent to the site, and none of the designations within the surrounding area are likely to be adversely affected by development at the site.'

'The Phase 1 habitat survey has established that habitats at the site largely appear to be of low ecological value and do not form a constraint to development at the site, with habitats of elevated value that will be lost being offset through new off-site habitat creation. Similarly, opportunities for faunal species are also limited, although the site provides potential habitat for bats, common birds and mammals (including Hedgehog).'

The Appraisal also recommended taking the opportunity to deliver ecological enhancements and as such, recommended we undertake a Biodiversity Net Gains Assessment (BNG). The outcome of the BNG concluded that as a result of undertaking the design across the expanded footprint, despite the use of area outside the current site boundary and the loss of habitat as a direct result, we deliver an overall enhancement through the following provision:

- *Wildflower Grassland Creation: two areas of wildflower grassland creation are proposed within the wider site area, replacing the bare ground and tall ruderal vegetation, totalling 0.04ha.*
- *Grassland Enhancement: species-poor grassland, namely AM2 and AM3, within wider site areas will be enhanced. from 'Grassland – Modified Grassland' to 'Grassland – Other Neutral Grassland' of 'moderate condition'.*
- *Woodland Enhancement: woodland on the wider site will be enhanced from 'Poor condition' to 'moderate condition'. This will be achieved through selective thinning and replanting of sections of the woodland to increase the number of age classes present, and re-using deadwood to create habitat piles, therefore increasing the quantity of deadwood within the woodland.*
- *Scrub Enhancement: wider site areas are dominated by species-rich dense scrub in 'moderate condition',and this will be enhanced to 'Good condition' by creating a well-developed edge with scattered scrub and tall grassland/herbs present between scrub and adjacent habitats.*

In addition, although not included in the BNG Assessment, on site, we will be delivering soft landscaped areas as part of our SuDS provision. This will be planted and add to the quality of the ecology provision for the site. As assessed in the BNG, this enhancement will exceed the required 10% net gain target value and as such, delivers on the provisions of the planning requirements.

3.4 Traffic

Within the Pre-Application response, the following requirements were outlined:

'Traffic – A transport assessment should be provided which details the impacts on the highway network. This will help determine if there are any necessary highway improvements which will need to be made;'

Furthermore, Section 9 of the NPPF focuses upon promoting sustainable transport and requires the developer to ensure the following:

- *'appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location'*
- *'safe and suitable access to the site can be achieved for all users'*
- *'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'*

We have established a Transport Statement as part of the design; this concludes that there are improved access arrangements designed to ensure efficiency of movement from both public and operational perspectives. This involves the provision of separate access points for public and operation vehicles off Reliance Street and provision of double lane width around the one-way system. The access arrangements reduce ensure the throughput of vehicles from Reliance Street, to reduce impact on the local network. It also enables the operational yard to be serviced without site closure as per the current arrangement; this will take potential queuing traffic away from Reliance Street.

The site is anticipated to enable a throughput of approximately 15,000 tonnes of waste per annum though this is not a maximum amount. This is essentially the same as at present.

Given that the majority of the proposed traffic movements are outside of the peak weekday travel times, and that the proposed site has a similar number of trips within the peak periods, the surrounding network is considered to have capacity to support the proposed development.

In addition to the findings on the Transport Statement, we believe that the expansion of the site, provision of more lanes and segregation of waste streams will result in a fundamentally, safer and more efficient operation and alongside that, will mean that more vehicles can be handled on the site at any one time. This alongside the separate operational vehicle access to the south of the public access and egress means that there will be less conflict and less queues on Reliance Street thereby delivering a safe means of access for public and operational users and reducing the impact on the wider highway network.

3.5 Air Quality

Within the Pre-Application response, the following requirements were outlined:

'Air quality – There are likely to be impacts on air quality during both the construction and operational phases of the development. An air quality report should be prepared which details appropriate mitigation measures including dust suppression during the construction phases and travel planning measures and mechanical ventilation for sensitive elevations during the operational phase together with electric car charging points.'

Addressing the main points from the Pre-Application response, we can confirm that the HWRC will be an open-air facility where household waste materials are brought onto site and containerised prior to being removed from site and treated elsewhere. The open-air nature of the site and lack of time on site for recyclable materials means that there is unlikely to be any odour from waste materials and unlikely to be any benefit to be gained through employment of mechanical means for ventilation of waste materials.

In terms of mitigation measures to be taken during construction; our contractor will be cognisant of the wider impact of dust and as part of their remit, will be made responsible for employing either street sweepers or bowsters during construction to ensure dust is not allowed to impact on the neighbouring sites or adjacent operational MTR site.

Regarding travel planning, this falls alongside the wider MTR site and given that the site sits in an area with good public transport links, there is good availability of means of travel other than car. The wider site already benefits from electric charging points and we will ensure that any additional parking spaces accord with the required minimum EV charging standards in terms of space allocation across the wider site. Given that the parking for the HWRC site is viewed in conjunction with the wider MTR site based on the site function and operation, we will ensure that the MTR Travel Plan is expanded to incorporate the HWRC rather than have two stand alone travel plans for the two site elements.

Furthermore, within NPPF, although there are no sections which relate directly to air quality, it is a subject referred to in Section 15 which states the planning should seek to *"sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified"*.

For our HWRC redevelopment, we will be seeking to reduce the potential for traffic build up on Reliance Street and increase the efficiency of movement around the site from a public and operational perspective.

The site function is primarily external. Waste will be segregated into streams and deposited into the relevant container before being removed from site and processed. In the current scenario, waste is commingled and bulked up ahead of pick up and removal from site. Due to the nature of this, there is the potential for waste positioned towards the bottom or back of the pile to remain untouched and potentially begin to rot which may result in fumes. The result of segregation and containerising the waste will serve to avoid potential dust or odour production.

Further mitigation will be provided through construction and operation will be to encourage the use of low emission vehicles and ensuring an adequate water supply is available on site for effective dust suppression.

The combined impact of these design aims alongside the open-air nature of operation and distance to potential receptors will clearly benefit from an air quality perspective, which will demonstrate dealing with the requirements of the NPPF.

3.6 Land Contamination

Within the Pre-Application response, the following requirements were outlined:

'Land contamination – A ground condition report which identify the existing ground conditions and any remediation proposals. This will ensure that suitable mitigation is put in place to ensure that there is no long term impacts on the site or surrounding water courses.'

Furthermore, the Manchester Local Development Framework Core Strategy (DPD) seeks us to address Policy EN 18 Contaminated Land and Ground Stability.

Through the Phase 1 Contaminated Land study, Coal Mining report and historic ground investigation report, we demonstrate that our proposals meet with the strategy and deliver on the requirements of the Pre-Application response. No great risks have been identified and no further investigation is recommended as an outcome of the report. The redevelopment will re-use the land currently in place as a HWRC and effort will be made to ensure that during construction, the potential issues resulting from lack of control of surface water or construction materials are controlled to mitigate any potential risk to either groundwater or the Moston Brook.

3.7 Noise/dust/emissions

Within the Pre-Application response, the following requirements were outlined:

'Noise – There are likely to be noise impacts from the construction and operational phases of the proposal. A construction management plan should be prepared to detail suitable mitigation for the construction phase together with acoustic insulation of building and plant equipment during the operational phase.'

Furthermore, the Manchester Unitary Development Plan (1995) requires us to ensure the development accords with the following Development and Noise policies, DC26.3, DC26.4 and DC26.5. In addition, whilst there are no specific sections within the NPPF relating to noise, it is

referenced in a number of paragraphs, specifically within Section 15 (Conserving and Enhancing the Natural Environment). Paragraph 180 states that planning decisions should ensure that:

'...new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life ...'*

The Dust and Emissions aspects are largely dealt with alongside Section 3.5 which outlines that the potential for dust and emissions are largely reduced through the redevelopment due to the improved site provision. The main issues with dust and emissions would be as a result of construction activity however, the contractor will deliver method statements and risk assessments to outline how they will fully consider both aspects to ensure that there is no potential for harm.

With respect to the potential for noise issues arising from site, we have undertaken a Noise Impact Assessment in support of our proposals. The Noise Impact Assessment outlines how we expect no qualitative change as a result of the redevelopment works given that the position and function of the site remain largely unaffected by the proposals, aside from the beneficial impact of the reduction in use of the front-end loader.

3.8 Odour

Within the Pre-Application response, the following requirements were outlined:

'Odour – Consideration of odours is required in order to determine if any specific mitigation is required.'

Greater Manchester Joint Waste DPS Objective 6 outlines that there is a requirement to *'ensure appropriate protection of the quality of life of communities'*.

The general thrust of our discussion on the subject of odour has already been addressed in Section 3.5. As an existing site, we are not aware of any odour issues or complaints as a result of the HWRC function and we do not envisage a change to this.

Fundamentally, we expect that the change in operation to deliver segregation of waste streams at source rather than bulk storage of the material in a single commingled pile, to mean that waste material is not allowed to stagnate and therefore in doing so, we will improve the present potential for harm to be caused through odour experienced locally. Given the nature of the open air facility, we would not expect any odour issues to result from the proposed operation.

3.9 Drainage Strategy

As with any development, the handling of surface water is a critical element of the design and can be an area where there is the potential to cause issues outside the site boundary.

In terms of planning policy, the Drainage Strategy has been done whilst considering how we deal with a number of Policy requirements as outlined below:

Manchester Local Development Framework Core Strategy (DPD)

Policy EN 8 Adaptation to Climate Change

Policy EN 14 Flood Risk

Policy EN 17 Water Quality

Section 14 of the NPPF refers to climate change and flood risk and asks the developer to consider the following:

'avoid increased vulnerability to the range of impacts arising from climate change'.

'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.'

'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.'

Manchester Local Development Core Strategy DPD Policy EN 14 - Flood Risk suggests that *'All new development should minimise surface water run-off, including through Sustainable Drainage Systems (SUDS) and the appropriate use of Green Infrastructure.'* and Policy EN 17 - Water Quality states *'Development should avoid any adverse impact on water quality, including during the construction phase, and wherever possible should seek to enhance water quality.....'* and *'Development should minimise surface water run-off from development and associated roads, and maximise the use of appropriate sustainable drainage systems, to minimise groundwater contamination, and to avoid pollutants reaching watercourses.'*

We have assessed flood risk and drainage strategy and the report and associated design drawings have been provided within this planning application.

The site falls within Flood Zone 1 and not at significant of future flooding from any source as identified in our report. The drainage strategy has been developed to ensure that site run off is managed to discharge to Moston Brook as is currently the case. The maximum runoff rate from the site delivers a 50% betterment over the current site brownfield runoff rate and we have designed the system to provide attenuation to ensure surface water is kept below ground when considering a climate change allowance of 40% and a 1 in 100 year storm event.

Water quality and SuDS provision has also been addressed for the site through provision of permeable paving to the reuse shop forecourt and provision of rain gardens to handle some of the upper site flows and in the operational yard through inclusion of a petrol interceptor to ensure that the quality of the water entering Moston Brook is both reduced and at a better quality to that as existing.

The design is in line with The SuDS Manual Guidelines and addresses quality and quantity issues and as such, will deliver on the planning policy requirements outlined above.

3.10 Crime Impact Statement

Manchester's Local Development Framework Core Strategy DPD policy DM1 – Development Management requires us to ensure we have taken account for *'.....Community Safety and crime prevention.'*

The site design will be similar to existing but will include modernised systems and security provision bringing in secure palisade fencing around the full site perimeter, site-wide CCTV coverage, lockable palisade gates, access barriers and robust, secure welfare and reuse shops to deter potential issues both on site and within the local area. The site design embraces the requirements of Secured By Design and will be managed in conjunction with the wider site.

3.11 Lighting Strategy

The requirement for a lighting strategy is required as a response to the Greater Manchester Joint Waste DPD Objective 6 which requires *'.....appropriate protection of the quality of life of communities'*. The lighting strategy is critical alongside the wider site design as it has the potential to impact on users outside the site boundary.

Our proposals will ensure that the HWRC design delivers *'a safe and sensitive level of light for the movement of pedestrians/drivers at night, whilst reducing the potential for obtrusive light and*

limiting this to a negligible level and in compliance with ILP GN01:2021.' All lighting is positioned to minimise potential impact off site and enables the system to be controlled to ensure lighting can be switched off to suit the operational timings and do not cause nuisance out of hours in the winter months.

Our lighting design seeks to deliver street lighting to the required operational standards on the HWRC without detrimental lighting pollution to surrounding site areas.

3.12 Coal Mining Assessment

We undertook a Coal Mining Assessment on the site; this confirms that whilst the site is within an area of historical coal mining activity, there appears very little risk of subsidence or ground gas as a result of this activity. The risks will be further established through the detailed design phase.

3.13 Community Involvement

From the outset, we have been keen to provide open communication and have sought community involvement in the HWRC redevelopment. Our Statement of Community Involvement demonstrates how we have engaged with the local community across multiple communication channels and welcomed and responded to feedback from the community engagement.

This engagement is key in ensuring that the HWRC development reflects the views of the public users and also ensures that it does not adversely impact on those local to the site.

4 CONCLUSIONS

4.1 Technical

The technical evidence which accompanies this application assists in the demonstration that technically the site is capable of delivering the development proposed without significant environmental, economic or social detriment to the local area, and has been demonstrated that there will also be beneficial effects arising from the Proposed Development.

The Proposed Development is, therefore, considered to be sustainable development in accordance with the National Planning Policy Framework and Adopted Local Plan and should be granted planning permission.

4.2 Benefits of the Development

A redeveloped HWRC will deliver sustainable development through driving the management of waste up the waste hierarchy. A new modern and efficient facility would deliver sustainable development by ensuring that the quantity of waste disposed to landfill is minimised and that a marketable product is recovered at source. It would benefit recycling and improve recovery therefore reducing the quantity of waste disposed to landfill.

The HWRC will maximise the existing capacity of the site and, in conjunction with other sites, ensure continuity of operation over the long-term.

The replacement HWRC will demonstrate delivery against National Planning Policy for Waste and the National Waste Management Plan for England.

The improved drainage provision will have a positive impact on the quality and quantity of surface water entering Moston Brook and through provision of SuDS, will benefit the on site provision.

The need for the development at Reliance Street HWRC will benefit the wider surroundings locally and reduce the impact on the highway delivering immediate benefits to users of the HWRC and the highway network.

4.3 Sustainable Development

The accompanying Transport Statement concludes that the Site is in a sustainable location and provides opportunities for staff/visitors to walk and cycle. Newton Heath and Moston tram stops are located approximately 350m away and forms part of the Manchester Metrolink. There are no existing highway safety issues within the vicinity of the Site.

Traffic generated by the development would remain unchanged from the existing operation but impact on the local highway would be reduced.

In respect of flood risk, the proposed development as 'less vulnerable' against those set out in the NPPF and would be sited entirely in Flood Zone 1. The site drainage system would be in line with the requirements of the SuDS Manual and would deliver an improvement against the current drainage system delivering quality, quantity and biodiversity improvements.

The biodiversity provision on site can be enhanced to demonstrate betterment to the current situation; even considering the land-take proposed to the north of the site boundary.

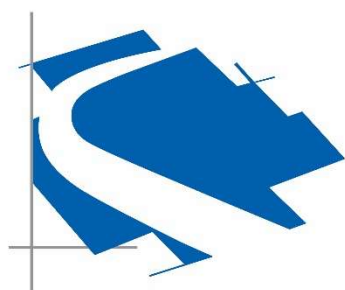
The Phase One Geo-Environmental Desk Study does not identify any significant risks of contamination. The site is surfaced which limits pathways.

The accompanying Visual Appraisal considers the impact of the new development upon receptors and is demonstrably less obtrusive compared to the current site provision; primarily reducing the site impact in terms of overall height massing.

The noise assessment for the site demonstrates that the new operation will be no different to that at present, offering improvements if anything based on the reduced operational movements resulting from the improved efficiency.

The conclusions of the accompanying assessments demonstrate in each case, that the development meets the standards of statutory consultees and demonstrate that opportunities have been taken to deliver a sustainable design alongside planning policy requirements.

In conclusion, there are no reasons why the proposed development should not be granted planning consent.



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