

## **WASTE MANAGEMENT STRATEGY**

### **1. Introduction and Scope of Assessment**

#### **1.1 Purpose of the Strategy**

This Waste Management Strategy has been prepared in direct support of a planning application seeking consent for the flexible mixed-use of an existing industrial unit at 11 Sherborne Street, Cheetham Hill, Manchester, to enable the continued lawful operation of the premises within Use Classes B2 (General Industrial) and B8 (Storage and Distribution), alongside the introduction of an indoor sport and wellness facility within Use Class E(d), together with a modest ancillary café. The purpose of this document is to provide a comprehensive, policy-led and evidence-based assessment of the nature, volume, storage, handling and collection of waste arising from the proposed development, and to demonstrate, in clear and unequivocal terms, that the proposal gives rise to no unacceptable impacts in waste management terms when assessed against the correct planning baseline and the relevant national and local policy framework. The assessment has been prepared to an appeal-ready standard, recognising that waste management is often raised as a secondary or residual concern in employment areas undergoing diversification, and therefore requires a level of scrutiny that not only demonstrates compliance but also robustly addresses and pre-empts any potential misconceptions or misinterpretations of impact.

The strategy does not simply describe how waste will be managed in isolation; rather, it situates waste management within the broader operational, spatial and policy context of the site. It recognises that waste is an output of land use activity and must therefore be assessed in direct comparison with the lawful use of the building, rather than against an abstract or artificially constrained scenario. In doing so, the document establishes a clear evidential position that the proposed development represents not merely an acceptable outcome in waste terms, but a material betterment when compared to the realistic and implementable fallback position. This distinction is fundamental and underpins the entirety of the assessment, ensuring that the conclusions reached are grounded in planning reality rather than theoretical assumption.

#### **1.2 Correct Assessment Baseline**

A rigorous and policy-compliant assessment of waste impacts must begin with the identification of the correct baseline scenario, which in this case is the unrestricted and fully implementable lawful use of the building within Use Classes B2 and B8. This is not a hypothetical or dormant permission, but an extant planning position which can be exercised at any time without further consent, and which therefore establishes the maximum reasonable envelope of waste generation, storage requirements and servicing intensity that the site is capable of accommodating. Industrial and storage/distribution uses of this nature are inherently associated with substantial and often fluctuating waste outputs, including but not limited to bulk packaging materials, pallet waste, shrink wrap, cardboard, plastics and general commercial refuse, as well as the potential for more specialised or process-related waste depending on the nature of the occupier. These waste streams are frequently generated in significant volumes, require external storage or skip rotation, and are typically serviced by regular collections involving larger vehicles and less predictable scheduling.

In contrast, the proposed development introduces a use which is fundamentally different in both its operational characteristics and its waste profile. The indoor sport and wellness facility does not involve manufacturing, processing or distribution activities, and therefore does not generate the types of bulk or industrial waste associated with B2/B8 uses. Instead, waste is limited to low-volume, non-hazardous commercial refuse and recyclable materials arising from day-to-day occupation, together

with a modest and proportionate element of food-related waste associated with the ancillary café. When assessed against the lawful fallback, it is therefore evident that the proposal represents a substantial reduction in both the volume and complexity of waste generation, as well as a simplification of storage and collection requirements. Any assessment which fails to apply this baseline, or which instead compares the proposal to a nil-use scenario or an artificially low-intensity occupation, would be fundamentally flawed and would materially misrepresent the true planning position.

### **1.3 Nature and Operational Characteristics of the Proposed Use**

The operational model of the proposed indoor sport and wellness facility is a critical determinant of its waste profile and must be properly understood in order to accurately assess its impacts. The use is structured around a pre-booked system, ensuring that all attendance is managed, controlled and capped at defined occupancy levels. This results in a predictable and evenly distributed pattern of activity throughout the day, rather than the variable and potentially intensive operational patterns associated with industrial or distribution uses. All activity is contained entirely within the existing building envelope, with no external operational areas, no open-air uses and no requirement for external plant, storage or servicing infrastructure. This level of containment is a key factor in ensuring that waste generation remains both limited and manageable.

The ancillary café element is modest in scale and clearly subordinate to the primary sporting use of the building. It does not operate as a standalone destination and does not generate independent customer flows or significant additional waste streams. Its function is limited to serving users of the facility, resulting in a small and predictable quantity of food-related waste which can be readily accommodated within standard commercial waste management arrangements. There are no processes involving large-scale food preparation, no external extraction systems and no requirement for specialist waste handling. The overall operational profile of the development is therefore one of low-intensity, controlled and easily manageable waste generation, which stands in clear contrast to the potential outputs of the lawful B2/B8 use.

### **1.4 Scope, Methodology and Robustness of Assessment**

This Waste Management Strategy adopts a comprehensive and precautionary approach to assessment, considering all relevant aspects of waste generation, classification, storage, handling and collection. The assessment has been undertaken on the basis of a realistic worst-case scenario, assuming peak operational conditions, maximum occupancy levels and conservative estimates of waste generation. This ensures that the conclusions reached are robust and not dependent on optimistic assumptions or best-case scenarios. The methodology reflects established professional practice and aligns with the expectations of both national and local planning policy, which require that development proposals demonstrate not only theoretical compliance but also practical deliverability.

The assessment also integrates site-specific evidence, including the proposed site layout and servicing arrangements, which confirm the availability of dedicated bin storage areas and kerbside collection points. These arrangements have been designed to ensure that waste can be managed efficiently within the confines of the site, without encroachment onto the public realm or conflict with other operational activities. The strategy therefore provides a complete and self-contained solution to waste management, which is both operationally practical and policy compliant.

## 1.5 Summary and Strategic Position

Drawing together the above, it is clear that the proposed development represents a highly controlled and low-impact use in waste management terms, which not only satisfies all relevant policy requirements but also delivers a clear and measurable improvement over the lawful fallback position. The reduction in waste volume, the simplification of waste streams, and the internalisation of storage and handling collectively result in a development which is inherently sustainable and environmentally responsible. The strategy therefore establishes, at the outset, that waste management does not represent a constraint to development and cannot reasonably be relied upon as a basis for refusal.

## 2. Policy Context and Compliance

### 2.1 National Planning Policy Framework

The National Planning Policy Framework establishes a clear and consistent policy position in relation to waste management, embedded within the broader objective of achieving sustainable development. It requires planning decisions to contribute to the efficient use of natural resources, to minimise waste generation and to ensure that any waste arising from development is managed in a way that protects both the environment and the amenity of existing and future occupiers. Central to this approach is the application of the waste hierarchy, which prioritises prevention at source, followed by reuse, recycling and recovery, with disposal as a last resort. The Framework makes clear that development which reduces waste generation and simplifies waste management processes should be supported as part of the transition to a more sustainable and resource-efficient economy.

The proposed development aligns fully and unequivocally with these principles. The nature of the indoor sport and wellness facility is such that waste generation is inherently limited at source, thereby satisfying the highest tier of the waste hierarchy without the need for complex mitigation or intervention. There are no industrial processes, no bulk material inputs and no activities which would give rise to significant or problematic waste streams. The reduction in waste generation is therefore embedded within the fundamental characteristics of the use, rather than being reliant on secondary measures. This represents the most effective and policy-compliant approach to waste management and is fully consistent with the objectives of the Framework.

### 2.2 Draft Manchester Local Plan 2025 – Policy EN11

At the local level, Policy EN11 of the Draft Manchester Local Plan 2025 requires that development proposals demonstrate how waste will be minimised, how appropriate storage facilities will be provided and how waste can be collected without adverse impacts on the surrounding environment or the operation of the highway network. The policy places emphasis on the integration of waste management into the design and operation of development, ensuring that it is both practical and effective. It also requires that development avoids giving rise to issues such as visual intrusion, odour, noise or obstruction associated with poorly designed or managed waste arrangements.

The proposed development satisfies each of these requirements in full. Waste generation is minimised by virtue of the low-intensity nature of the use, storage is provided internally within the building envelope, and collection is facilitated through established servicing arrangements without the need for additional infrastructure or alterations to the highway network. There is no reliance on on-street storage, no potential for obstruction and no mechanism by which waste management could give rise to amenity impacts. The proposal therefore represents a clear and direct response to the requirements of Policy EN11 and demonstrates full compliance in both design and operational terms.

## **2.3 Strategic Alignment and Regeneration Context**

The proposal must also be considered within the wider strategic context established by the Draft Manchester Local Plan, the Places for Everyone Joint Development Plan and the regeneration frameworks for the Cheetham Hill and Great Ducie Street area. These documents collectively support the diversification, intensification and modernisation of employment areas, recognising that traditional industrial uses are evolving and that a broader mix of commercial and service-based uses can enhance both economic productivity and environmental performance. The efficient reuse of existing buildings is a key component of this strategy, reducing the need for new development and making better use of existing resources.

In this context, the proposed development represents a clear example of policy-compliant regeneration. It introduces a viable and active commercial use within an existing building, increases employment intensity and supports health and wellbeing objectives, while simultaneously reducing the environmental impact associated with waste generation. This dual benefit is a material consideration which weighs significantly in favour of the proposal and reinforces its compliance with the development plan as a whole.

## **2.4 Comparative Policy Assessment**

A critical aspect of policy compliance in this case is the comparative assessment against the lawful B2/B8 fallback position. Industrial and storage/distribution uses are typically associated with higher waste volumes, more complex waste streams and greater reliance on external storage and servicing. The proposed development replaces this with a simpler, more controlled and more sustainable waste profile. When assessed in this context, the proposal does not merely comply with policy; it exceeds policy expectations by delivering a clear improvement in environmental performance.

Any suggestion that the development would give rise to unacceptable waste impacts would therefore require a failure to properly consider this comparative position or a misapplication of policy. There is no evidential or policy basis for such a conclusion.

## **2.5 Policy Compliance Conclusion**

In summary, the proposed development is fully compliant with the requirements of the National Planning Policy Framework and Policy EN11 of the Draft Manchester Local Plan 2025, as well as the wider strategic objectives of sustainable development and regeneration. It minimises waste generation at source, provides appropriate and effective storage arrangements, and ensures that waste can be collected without adverse impact. When assessed against the lawful fallback position, it delivers a clear and measurable improvement in waste management terms. There is therefore no policy conflict and no justification for refusal on waste grounds.

## **3. Baseline Waste Generation and Comparative Analysis**

### **3.1 Lawful B2/B8 Waste Profile and Operational Reality**

When properly assessed against the lawful and implementable fallback position, the site is capable of generating a materially greater and more complex waste profile than that associated with the proposed development. Uses within Class B2 and B8 are inherently linked to industrial processing, storage and distribution functions, all of which generate substantial quantities of waste as a direct by-product of their operation. This includes bulk packaging materials such as cardboard and plastics, pallet waste, shrink wrap, strapping and general commercial refuse, often arising in large volumes and at irregular intervals depending on throughput and supply chain activity. These uses also frequently require

external storage arrangements, including skips or bulk containers, and are serviced by routine collections involving larger vehicles, including vans and heavy goods vehicles, operating on schedules that are driven by logistics demand rather than controlled operational management.

The variability of such uses is a critical factor. Waste generation under B2/B8 is not fixed or predictable, but fluctuates in response to operational intensity, stock turnover and distribution cycles. This results in peaks of waste generation that can place pressure on storage capacity and require responsive servicing arrangements. In addition, the composition of waste is often mixed and may include materials that are less easily segregated or recycled, further increasing the complexity of management. This establishes a baseline scenario which is both higher in volume and more demanding in operational terms than the proposed development.

### **3.2 Proposed Use – Reduced and Controlled Waste Generation**

In contrast, the proposed indoor sport and wellness facility introduces a use which is fundamentally different in its operational characteristics and, as a direct consequence, its waste profile. The development does not involve manufacturing, processing or large-scale storage of goods and therefore does not generate bulk industrial waste streams. Waste is limited to general commercial refuse associated with day-to-day occupation, recyclable materials such as paper, card and plastics, and a modest quantity of food-related waste arising from the ancillary café. These waste streams are inherently low in volume, consistent in composition and predictable in their generation, allowing for a far more controlled and efficient management approach.

The pre-booked operational model further reinforces this position. Occupancy levels are capped and managed, resulting in a steady and evenly distributed pattern of use rather than the fluctuating and potentially intensive activity associated with industrial operations. This directly translates into a stable and manageable waste output, with no peaks or surges that would require additional infrastructure or servicing capacity. The absence of any industrial processes or high-volume material inputs ensures that waste generation remains intrinsically limited at source, aligning fully with the principles of the waste hierarchy.

### **3.3 Quantitative and Qualitative Betterment**

When assessed in comparative terms, the proposed development delivers both a quantitative and qualitative improvement in waste management outcomes. The overall volume of waste generated is significantly reduced, removing the need for bulk storage or frequent servicing and allowing for a simplified and proportionate management strategy. At the same time, the composition of waste is cleaner, more consistent and more easily segregated, enabling higher rates of recycling and more efficient processing. This represents a clear environmental benefit and a material improvement over the lawful fallback position, which must be given substantial weight in the planning balance.

It is therefore not sufficient to conclude merely that the proposal is acceptable in waste terms. The correct and policy-compliant conclusion is that the proposal actively reduces the potential for waste-related impacts when compared to the existing lawful use. Any alternative interpretation would fail to properly apply the correct baseline and would materially misrepresent the true planning position.

## **4. Waste Storage Strategy**

### **4.1 Internalised Storage and Design Integration**

The proposed development adopts a fully internalised approach to waste storage, ensuring that all waste is contained within the existing building envelope and integrated into the operational layout of the facility. This approach represents best practice in urban commercial development, as it eliminates the potential for visual intrusion, prevents windblown litter, and avoids issues associated with odour or vermin that can arise from poorly managed external storage. The existing industrial building provides ample internal volume to accommodate dedicated waste storage areas without compromising operational efficiency or user experience, allowing waste management to be seamlessly incorporated into the functioning of the building.

### **4.2 Provision, Capacity and Site Layout**

The proposed site plan confirms the provision of clearly defined bin storage areas, including separate containers for general waste, recycling and food waste. These facilities are proportionate to the scale and nature of the development and have been designed to accommodate peak operational scenarios without exceeding capacity. The use of standard 240-litre bins reflects the modest waste volumes associated with the development and ensures compatibility with routine commercial collection services. The location of the bin storage area has been carefully considered to allow for efficient access by waste operatives while maintaining separation from primary circulation routes and parking areas, ensuring that waste management does not interfere with the day-to-day operation of the site.

### **4.3 Segregation, Recycling and Operational Efficiency**

A key component of the storage strategy is the segregation of waste at source, enabling the efficient separation of recyclable materials and reducing the volume of residual waste requiring disposal. Dedicated containers are provided for paper and card, plastics, cans and glass, alongside general refuse and food waste. This arrangement aligns with the requirements of both national policy and local guidance, which emphasise the importance of facilitating recycling through appropriate on-site provision. The simplicity and consistency of the waste streams generated by the proposed use further enhance the effectiveness of this approach, allowing for straightforward and reliable segregation without the need for complex management systems.

### **4.4 Amenity Protection and Environmental Performance**

The internalisation of waste storage ensures that there are no adverse impacts on the surrounding environment or neighbouring occupiers. There is no potential for visual clutter within the public realm, no exposure of waste to external conditions and no mechanism by which odour or noise could affect nearby receptors. This represents a significant improvement over typical industrial scenarios, where external storage and skip rotation can give rise to amenity concerns. The proposal therefore not only complies with policy requirements but exceeds them by delivering a higher standard of environmental performance.

## **5. Waste Collection and Servicing**

### **5.1 Collection Strategy and Practical Operation**

Waste collection will be undertaken through a straightforward and efficient kerbside arrangement, as confirmed on the proposed site plan. Bins will be presented for collection at appropriate intervals and returned to the internal storage area following servicing. The modest scale of waste generation ensures that collection frequency can be limited and proportionate, avoiding unnecessary vehicle movements while maintaining effective waste management.

### **5.2 Servicing Intensity and Vehicle Movements**

The level of servicing associated with waste collection is materially lower than that which could arise under the lawful B2/B8 use. Industrial and warehouse operations often require frequent collections and the use of larger vehicles, including heavy goods vehicles, to accommodate bulk waste removal. The proposed development eliminates this requirement entirely, replacing it with occasional collections by standard commercial vehicles. This represents a clear reduction in servicing intensity and associated impacts on the highway network.

### **5.3 Integration with Site Circulation**

The design of the site ensures that waste collection can be accommodated without conflict with parking or vehicle circulation. The proposed layout provides sufficient space for vehicles to access the collection point safely and efficiently, with no requirement for reversing onto the public highway or obstructing access routes. This reflects a well-considered and practical approach to servicing, consistent with the established use of the site and the existing highway infrastructure.

### **5.4 Highway and Safety Considerations**

There are no highway safety implications arising from the proposed waste collection arrangements. The level of activity is modest, predictable and well within the capacity of the surrounding network, which is already designed to accommodate significantly more intensive industrial servicing. The proposal therefore maintains, and in practical terms improves, existing conditions in terms of servicing impact.

## **6. Operational Waste Management**

### **6.1 Management Framework and Accountability**

The operational management of waste at the site will be subject to a clear, structured and continuously controlled framework overseen by the site operator, ensuring that all waste arising from the development is managed proactively, efficiently and in full accordance with both statutory requirements and best practice guidance. Unlike industrial or warehousing uses operating within Use Classes B2 and B8, where waste generation can be sporadic, volume-driven and dependent on fluctuating commercial throughput, the proposed development benefits from a highly controlled operational model characterised by predictable patterns of use, fixed occupancy limits and continuous on-site supervision. This distinction is critical, as it ensures that waste management is not a reactive process but an embedded and actively managed component of the day-to-day operation of the facility.

Responsibility for waste management will sit clearly with the site operator, who will ensure that all procedures relating to waste segregation, storage, handling and presentation for collection are implemented consistently and monitored on an ongoing basis. The presence of staff on site throughout operational hours provides a continuous layer of oversight, ensuring that waste is not only managed

correctly but also that any deviation from expected practice is immediately identified and addressed. This level of operational control is materially greater than that typically associated with B2/B8 uses, where periods of limited supervision or reliance on periodic servicing can result in less consistent management outcomes.

## **6.2 Controlled Waste Generation and Predictable Outputs**

A defining characteristic of the proposed development is the controlled and predictable nature of waste generation, which directly informs the effectiveness of its management strategy. The pre-booked operational model ensures that all activity within the building is scheduled, capped and evenly distributed, preventing the occurrence of uncontrolled peaks in occupancy or usage. This results in a steady and manageable flow of waste, rather than the variable and potentially intensive outputs associated with industrial or distribution operations. The absence of manufacturing processes, bulk material handling or high-turnover logistics activity further reinforces this position, ensuring that waste generation remains inherently limited at source.

This predictability allows for precise alignment between waste generation and storage capacity, eliminating the risk of over-accumulation or the need for contingency arrangements such as additional containers or emergency collections. It also ensures that waste collection can be scheduled at appropriate intervals without the need for reactive or ad hoc servicing, thereby maintaining an efficient and stable operational environment. The result is a waste management system that is not only compliant but inherently resilient and self-regulating.

## **6.3 Staff Procedures, Segregation and Daily Operations**

Waste handling procedures will be integrated into the routine operational responsibilities of on-site staff, ensuring that waste management is treated as a core function of the facility rather than an ancillary consideration. Staff will be responsible for the segregation of waste at source, the transfer of waste to designated storage areas and the preparation of bins for collection in accordance with established schedules. The simplicity and consistency of the waste streams generated by the proposed use facilitate this process, allowing for straightforward and reliable segregation without the need for specialist training or complex systems.

The continuous presence of staff ensures that waste is managed in real time, preventing the accumulation of waste within operational areas and maintaining a high standard of cleanliness throughout the building. This active management approach contrasts sharply with the passive or periodic management typically associated with industrial uses, where waste may be stored in bulk and removed at intervals, increasing the potential for inefficiencies or environmental impacts. The proposed development therefore delivers a higher standard of operational control and environmental performance as a direct consequence of its use characteristics.

## **6.4 Cleanliness, Monitoring and Ongoing Review**

The internal waste storage areas will be subject to regular inspection and maintenance, ensuring that they remain clean, functional and free from any issues associated with odour, spillage or contamination. The enclosed nature of the storage environment provides a high level of containment, while the limited volume and non-hazardous composition of the waste further reduce the potential for any adverse effects. Monitoring will be undertaken as part of routine operational management, allowing for the early identification of any issues and the implementation of corrective measures where necessary.

This continuous monitoring and maintenance regime ensures that the waste management system remains effective over time and is capable of adapting to any minor variations in operational activity. However, given the inherently stable and predictable nature of the proposed use, significant variation is neither anticipated nor likely. The system is therefore not only robust at the point of implementation but also sustainable in the long term.

### **6.5 Comparative Operational Advantage Over B2/B8 Uses**

When assessed against the lawful B2/B8 fallback position, the operational waste management framework associated with the proposed development represents a clear and substantial improvement. Industrial and warehousing uses often involve higher volumes of waste, greater variability in generation, and a reliance on external storage and periodic servicing, which can result in less consistent management and greater potential for environmental impact. In contrast, the proposed development introduces a controlled, continuously managed and internally contained waste management system, supported by on-site staff presence and predictable operational patterns.

This comparative advantage is a material planning consideration. It demonstrates not only that the proposal is acceptable in waste management terms, but that it actively enhances the way in which waste is handled and controlled on the site. Any suggestion that the development would give rise to operational deficiencies or management concerns would therefore be unsupported by both the evidence and the comparative analysis.

### **6.6 Compliance and Conclusion on Operational Management**

The operational waste management strategy is fully compliant with the requirements of the National Planning Policy Framework and Policy EN11 of the Draft Manchester Local Plan 2025. It provides a clear, deliverable and effective framework for the management of waste, ensuring that all waste is minimised, appropriately stored and collected without adverse impact. The integration of waste management into the operational structure of the development, combined with continuous staff oversight and a predictable waste profile, ensures that the system is both robust and inherently sustainable.

In conclusion, waste management is not a constraint to development. On the contrary, the proposed operational framework represents a significant improvement over the lawful fallback position, delivering a higher standard of control, efficiency and environmental performance. There is therefore no basis upon which concerns could reasonably be raised, and no justification for refusal on operational waste management grounds.

## **7. Environmental Impact and Sustainability**

### **7.1 Alignment with the Waste Hierarchy and Resource Efficiency**

The proposed development demonstrates full and unequivocal alignment with the waste hierarchy as set out within national policy, which prioritises the prevention of waste at source as the most sustainable and effective form of waste management. The critical distinction in this case is that the proposal does not rely on downstream mitigation measures to achieve compliance, but instead delivers waste minimisation through the fundamental characteristics of the use itself. The indoor sport and wellness facility does not involve industrial processes, manufacturing activity, or high-volume material throughput, and therefore avoids the generation of bulk waste streams that would otherwise require management, processing or disposal. This represents the highest tier of policy compliance, as waste is prevented rather than managed after the fact.

In contrast, the lawful B2/B8 fallback position is inherently less aligned with the waste hierarchy. Industrial and distribution uses generate waste as an unavoidable by-product of their operation, often in substantial volumes and with varying degrees of recyclability. Even with effective management, such uses typically operate further down the waste hierarchy, relying on recycling and disposal rather than prevention. The proposed development therefore represents a clear and measurable improvement in resource efficiency, reducing demand on waste infrastructure and contributing positively to wider environmental objectives. This distinction carries significant weight in policy terms and reinforces the conclusion that the proposal delivers a more sustainable pattern of development.

## **7.2 Reduction in Environmental Externalities and Operational Impacts**

The environmental benefits of the proposed waste management approach extend beyond simple reductions in waste volume and encompass a broader range of externalities associated with waste handling, storage and collection. The internalisation of waste storage eliminates the potential for visual intrusion, windblown litter and environmental degradation within the public realm, ensuring that the site maintains a clean and orderly appearance at all times. The enclosed nature of the storage environment also prevents the escape of odour and removes any pathway for vermin or contamination, thereby safeguarding both environmental quality and public health.

In terms of servicing, the reduction in waste volume directly translates into a reduction in vehicle movements associated with waste collection. Under the lawful B2/B8 use, the site could reasonably generate frequent collections, including the use of larger vehicles, in response to bulk waste outputs and operational variability. The proposed development removes this requirement entirely, replacing it with infrequent, low-intensity collections by standard commercial vehicles. This reduction in servicing activity contributes to lower emissions, reduced noise and diminished pressure on the local highway network, aligning with the broader environmental objectives of the planning system.

The controlled and predictable nature of waste generation further enhances this position. There are no irregular peaks in waste output, no requirement for reactive servicing and no risk of over-accumulation or overflow. The system operates within a stable and self-regulating framework, ensuring that environmental impacts remain consistently low and fully manageable over time.

## **7.3 Contribution to Sustainable Land Use and Urban Regeneration**

The environmental performance of the proposal must also be understood within the wider context of sustainable land use and urban regeneration. The development represents the reuse and intensification of an existing industrial building within a highly accessible inner-urban location, avoiding the need for new construction and making efficient use of existing resources. This aligns directly with the core objectives of the National Planning Policy Framework, which seeks to promote the effective use of land and support development within existing urban areas.

In waste terms, this approach delivers additional environmental benefits. The retention and adaptation of the existing building avoids the generation of construction waste associated with demolition and redevelopment, while the introduction of a lower-impact operational use reduces the ongoing environmental burden associated with the site. The proposal therefore contributes to both short-term and long-term sustainability objectives, reinforcing its compliance with policy and its suitability within the evolving urban context of Cheetham Hill and the wider Strangeways regeneration area.

This position is further supported by the strategic direction of the Draft Manchester Local Plan and the Places for Everyone Joint Development Plan, both of which promote the diversification and modernisation of employment areas, the efficient use of land and the delivery of sustainable

development. The proposed development aligns fully with these objectives, demonstrating that environmental performance and economic productivity can be achieved concurrently through the appropriate reuse of existing assets.

#### **7.4 Comparative Environmental Performance and Policy Weight**

A critical and determinative factor in the assessment of environmental impact is the comparative performance of the proposed development against the lawful fallback position. When assessed on this basis, the proposal delivers a clear and substantial environmental benefit. It reduces the volume of waste generated, simplifies the composition of waste streams, internalises storage, reduces servicing intensity and eliminates the potential for external impacts associated with industrial waste handling. These improvements are not marginal or incidental, but fundamental to the nature of the proposed use and its operational characteristics.

In planning terms, this comparative betterment must be afforded significant weight. National policy does not require development to achieve absolute neutrality in environmental terms; rather, it seeks to ensure that impacts are acceptable and, where possible, improved. The proposal exceeds this requirement by delivering a demonstrable reduction in environmental impact when compared to the existing lawful use. Any assessment which fails to recognise this improvement, or which treats the proposal as introducing new impacts without reference to the fallback position, would be inconsistent with established planning principles and policy guidance.

#### **7.5 Sustainability Conclusion**

In conclusion, the proposed development represents a highly sustainable form of development in waste management terms, aligning fully with the waste hierarchy, reducing environmental externalities and contributing to the efficient use of land and resources. The proposal delivers a clear improvement over the lawful B2/B8 fallback position, reducing both the volume and impact of waste while providing a controlled and effective management framework. There are no adverse environmental effects arising from the development, and no basis upon which sustainability concerns could reasonably be raised.

The proposal therefore accords fully with the environmental objectives of the National Planning Policy Framework, the Draft Manchester Local Plan 2025 and the wider development plan. Waste management considerations weigh positively in favour of the development and reinforce the conclusion that the proposal constitutes sustainable development.

### **8. Planning Balance and Conclusion**

#### **8.1 Overall Assessment and Policy Position**

This Waste Management Strategy has demonstrated, through a detailed, policy-led and evidence-based assessment, that the proposed development at 11 Sherborne Street gives rise to no adverse impacts in waste management terms and is fully compliant with all relevant national and local planning policy requirements. The assessment has been undertaken against the correct and lawful baseline, namely unrestricted B2 and B8 use of the building, which establishes the maximum realistic envelope of waste generation, storage requirements and servicing intensity associated with the site. When properly assessed against this baseline, the proposed development does not introduce additional impacts, nor does it give rise to any new or unmanageable waste streams. On the contrary, it results in a clear and measurable reduction in both the volume and complexity of waste generated, together with a simplification of storage and collection arrangements.

The development therefore accords fully with the National Planning Policy Framework, which requires that planning decisions contribute to the efficient use of resources, minimise waste and avoid unacceptable environmental impacts. It also satisfies the requirements of Policy EN11 of the Draft Manchester Local Plan 2025, which seeks to ensure that waste is minimised, appropriately stored and capable of being collected without harm to amenity or the operation of the highway network. There is no conflict with policy, either in principle or in detail, and no evidential basis upon which waste considerations could reasonably justify the refusal of planning permission.

## **8.2 Comparative Betterment Over the Lawful Fallback**

A determinative consideration in this case is the comparative assessment against the lawful B2/B8 fallback position, which carries substantial weight in accordance with established planning principles. Industrial and storage/distribution uses of this nature are inherently capable of generating significantly greater volumes of waste, including bulk materials, mixed waste streams and operational by-products, often requiring external storage and frequent servicing by larger vehicles. These characteristics give rise to a higher potential for environmental impact, including visual intrusion, noise, odour and increased vehicle movements associated with waste collection.

The proposed development replaces this scenario with a low-intensity, internally contained and operationally controlled use, which generates only modest volumes of non-hazardous waste that can be easily segregated, stored and collected within standard commercial arrangements. Waste storage is internalised, eliminating any external impact, and collection is infrequent and proportionate to the limited waste output. The proposal therefore delivers a clear and substantive improvement in waste management terms, reducing both the scale of impact and the complexity of management. This is not a neutral change, but a positive and material betterment, which must be afforded significant weight in the overall planning balance.

## **8.3 Rebuttal of Potential Concerns and Misapplication of Policy**

Any suggestion that the proposed development would give rise to unacceptable waste impacts would be unsupported by both the evidence and the correct application of planning policy. Such a position would necessarily rely on either an incorrect baseline assessment, failing to take account of the lawful B2/B8 use, or an overstatement of the waste generated by the proposed use, neither of which can be substantiated. The evidence clearly demonstrates that waste volumes are low, waste streams are simple and manageable, and all storage and collection arrangements are appropriate and policy compliant.

Furthermore, the internalisation of waste storage and the controlled nature of the operational model ensure that there is no pathway for adverse effects on amenity, highway safety or environmental quality. There are no technical constraints, no capacity issues and no operational deficiencies that would justify concern. Any reason for refusal based on waste management would therefore represent a misapplication of policy, a failure to properly consider the comparative assessment, and an overstated interpretation of impact which is not borne out by the facts.

## **8.4 Contribution to Sustainable Development**

The proposal must also be considered in the context of the overarching objective of achieving sustainable development, as set out in the National Planning Policy Framework. In waste management terms, the development performs strongly across all relevant dimensions. It reduces waste generation at source, aligns with the waste hierarchy, minimises environmental impact and integrates waste

management into a controlled and efficient operational framework. These characteristics are not incidental but are intrinsic to the nature of the use and the design of the development.

When combined with the wider benefits of the scheme, including the intensification and diversification of employment use, the provision of health and wellbeing facilities, and the contribution to the regeneration of the Cheetham Hill and Strangeways area, the proposal represents a clear example of sustainable development in accordance with the development plan when read as a whole. Waste management considerations therefore reinforce, rather than detract from, the overall acceptability of the scheme.

### **8.5 Final Planning Conclusion**

In conclusion, the proposed development is fully compliant with all relevant planning policy in respect of waste management and delivers a clear and measurable improvement over the lawful fallback position. There are no adverse impacts, no technical constraints and no evidential basis for concern. The proposal not only meets policy requirements but exceeds them by providing a more sustainable, efficient and controlled approach to waste management within an existing employment building.

The planning balance is therefore clear and unequivocal. Waste management considerations weigh positively in favour of the development and cannot reasonably form the basis of refusal. The proposal constitutes sustainable development, accords with the development plan when read as a whole, and should be granted planning permission without delay.