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Dear WBC,

I've just had chance to review the supporting Waste Needs Assessment, and believe that the findings and reporting within this supporting document are flawed and lead to assumptions which are not dealt with in the LDP.

1. The need for a WWTW for 6,600+houses, a secondary school, a leisure centre, 4 primary schools, a supermarket and health centre – the report states that this demand would be dealt with by “expansion” of an existing facility. This does not seem credible given the scale of the development. Accordingly, a new WWTW should appear as part of the garden city suburb.
2. Local Authority Collected Waste – the report indicates a gap of between 75,000 and 80,000 tonnes of disposal capacity – this is the correct amount for a small scale EFW. Whilst other facilities in the North West are indicated, the report does not indicate what spare capacity is available to WBC. In particular, it notes several facilities which have not been built (and with potential project difficulties, e.g. Energos at Knowsley), a facility which is closing (Fiddlers Ferry) and another facility which has just suffered a fire – Bolton TRF. Given the guiding policy principles of proximity and self sufficiency, that suggests that WBC require development of an EFW. Note – this is a minimum gap for LACW, and that there are other sources of waste which also require disposal as waste management moves up the waste hierarchy and away from landfill.
3. It is not clear in either the waste needs assessment, or any of the other supporting papers where the issue of decarbonising heat is addressed. This is required to meet the government targets on the low carbon economy, and to provide low cost heat to consumers. The standard solution for this is a district heating network which has not been mentioned within the LDP. A new EFW linked to a district heating network would appear to be the ideal response to this issue, however it appears ignored.

On this basis, the local development plan requires additional information on a new WWtW, a district heating network and a review of the analysis surrounding waste (RDF/EFW) capacity, and identification of where a new WWtW and energy centre (EFW?) would be located within the Garden City development.

This suggests that the LDP is premature and should be withdrawn.

Regards,

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