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# **BRADFORD WASTE MANAGEMENT DPD – PROPOSED MODIFICATIONS ADDENDUM TO SUSTAINABILITY APPRAISAL REPORT**

**BRADFORD WASTE MANAGEMENT DPD – PROPOSED  
MODIFICATIONS  
ADDENDUM TO SUSTAINABILITY APPRAISAL REPORT**

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## 1. INTRODUCTION

This Screening Report forms part of the Sustainability Appraisal (SA) for the Bradford Waste Management Development Plan Document (DPD).

In January 2017 Bradford Metropolitan District Council (BMDC) identified a number of proposed modifications to policies in the submitted Bradford Waste Management DPD. These proposed modifications relate mainly to provision of updated baseline information as well as amendments proposed to incorporate the 'Outstanding Mitigation' put forward by the Sustainability Appraisal (May 2016).

The Bradford Waste Management DPD has been subject to SA at each stage of its preparation. Available reports are listed below (references refer to the DPD Examination filing system - available to view at <https://www.bradford.gov.uk/planning-and-building-control/planning-policy/waste-management-dpd/?Folder=6%20Submission%20to%20the%20Secretary%20of%20State\1+Submission+documents>):

- Bradford Waste Management DPD Issues and Options Paper (BMDC, November 2009) **(Ref: WM-SD-038)**
- Sustainability Appraisal of the Issues and Options Paper (ENVIRON, May 2010) **(Ref: WM-SD-040)**
- Bradford Waste Management DPD Preferred Approach Paper (BMDC, January 2011) **(Ref: WM-SD-027)**
- Bradford Waste Management DPD Preferred Approach Paper – Sustainability Appraisal Report (ENVIRON, December 2010) **(Ref: WM-SD-028)**
- Bradford Waste Management DPD Preferred Approach Paper – Revised Chapter 5 (BMDC, October 2011) **(Ref: WM-SD-021)**
- Bradford Waste Management DPD Preferred Approach Paper – Revised Chapter 5 – Sustainability Appraisal Supplement to the SA Report (ENVIRON, October 2011) **(Ref: WM-SD-022)**
- Bradford Waste Management DPD Publication Draft (BMDC, November 2015) **(Ref: WM-SD-010)**
- Publication Draft Sustainability Appraisal Report (ENVIRON, May 2013) **(Ref: WM-SD-011)**
- Bradford Waste Management DPD Submission Draft (BMDC, May 2016) **(Ref: WM-SD-001)**
- Submission Draft Sustainability Appraisal Report (Ramboll Environ, May 2016) **(Ref: WM-SD-002)**

This report provides a screening of each of the proposed modifications, to consider whether they would impact on the results of the SA, including on the likely significant cumulative effects of the Waste Management DPD.

## 2. SCREENING THE EFFECTS OF THE PROPOSED CHANGES

Planning Practice Guidance (<https://www.gov.uk/government/collections/planning-practice-guidance>) states that it is up to the local planning authority to decide whether SA reports should be amended following proposed modifications. In order to make this decision, a screening exercise has been undertaken of the modifications proposed and updated conclusions drawn where necessary. Screening of the changes is shown in Table 2.1 below.

Assessment of alternatives is an important aspect of SA and it is important that reasonable alternatives (if reasonable alternatives exist) are tested throughout the local development planning process (including at the modifications stage).

The majority of the modifications that have been made are minor changes which clarify the way that policies will be implemented or are being implemented as a result of new government policy or updated evidence.

A number of the modifications have been made in order to incorporate the outstanding mitigation measures proposed within the SA report; therefore, these have improved the performance of the Plan against the SA objectives. Further details are provided in Table 2.1 below.

**Table 2.1: Screening the Proposed Changes –Cambridge Local Plan**

Please note that modifications are shown as ~~cross through~~ and new text.

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
<b>Policy or plan reference</b>	<b>Proposed Change</b>	<b>SA screening</b>
Vision	Bradford needs to take responsibility for the waste it generates, undertaking a step-change in the way it manages its waste, through more sustainable waste management, moving the management of waste up the waste hierarchy of: prevention; preparing for re-use; recycling; other recovery and only disposing of waste as a last resort. We aspire to achieve net self-sufficiency, managing the waste we generate at the nearest appropriate facilities, and will put in place the necessary structures and systems to enable this to happen including the promotion of a range of technologies, <u>model shift in the transportation of waste arisings</u> and crossboundary working where appropriate. <u>This will aid in climate mitigation and adaptation.</u>	The sustainability performance of the plan has improved via inclusion of an explicit reference to climate change mitigation and adaptation, explaining how measures including the proximity principle, promotion of a range of technologies, model shift in transportation of waste and crossboundary working will contribute to this.  <b>Screening conclusion: the SA now identifies a major positive impact in relation to objective SA3 and a minor positive impact in relation to objective SA10. Please see Appendix 1.</b>
Objective 3	To ensure that expansions to existing facilities where appropriate and new waste facility developments support the planned growth and waste needs of the Bradford community and are delivered in a manner which protects <u>and enhances</u> the District's environmental assets and safeguards human health.	The policy has been strengthened via the inclusion of the concept of enhancement within Objective 3, which supports the improvement of the environment.  <b>Screening conclusion: the SA now identifies a minor positive impact in relation to objective SA5. Please see Appendix 1.</b>
Objective 5	Objective 5: To work in collaboration with appropriate local authorities and waste industry operators to ensure that sub-regional waste (and if necessary beyond the subregion) issues are effectively considered and planned for in accordance with the duty to co-operate. Cross boundary issues including the movement of waste, <u>transportation of waste arisings by sustainable transport modes</u> and locating of facilities near to source must be managed and planned for collectively where possible	This is a minor change to supporting text which strengthens the policy in relation to SA10 (in accordance with the change to the vision, described above).  <b>Screening conclusion: the SA now identifies a minor positive impact in relation to objective SA10. Please see Appendix 1.</b>
Paragraph 2.19	The Waste Management DPD therefore does consider opportunities for joint cross-boundary working on waste matters and also reflects the	This is a minor change to supporting text  <b>Screening conclusion: no change to the results of the SA.</b>

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
	possibility of a continued Bradford and Calderdale joint initiative for <del>Municipal Solid Waste</del> management facilities. <u>need to work closely with neighbouring authorities.</u>	
Policy W1 Cross Boundary Working	<u>Work collaboratively to</u> promote (where possible) modal shift in the movement of waste from road to more sustainable forms of transport.	The policy has been strengthened to include reference to the pursuit of modal shift in collaboration with neighbouring authorities. <b>Screening conclusion: no change to the results of the SA.</b>
Policy W2 Bradford’s Future Waste Capacity Requirements	There is a requirement to accommodate for <del>1,681,962</del> <u>1,802,609</u> tonnes of waste arisings over the period to 2030. In providing for this level of waste, the Council will support the prevention of waste, its re-use, recycling and other recovery (including energy from waste) in accordance with the Core Strategy policy WM1. The Council aim is to achieve net self-sufficiency and acknowledges the most appropriate and sustainable solution to waste management may result in relying on treatment capacity in adjacent authority areas, in line with European and national policy guidance.	This is a change to increase the amount of waste that the plan needs to relate to. However, it is understood that no additional sites would need to be allocated in order to process the additional waste; therefore, this increase would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Paragraph 4.5	A number of sites have been shortlisted as having potential to accommodate more than one type of waste management facility, subject to Environmental Permits being obtained. <u>Applicants are advised to enter into discussions with the Environment Agency regarding Environmental Permits at the earliest opportunity to assist in identifying and responding to any key issues, which may need to be addressed.</u> Any development proposals on shortlisted sites must accord with the relevant Waste Development Management policies as set out in Section 7 of this document. For further information on the site assessment process see the full Site Assessment Report which accompanies this document.	This is a minor change to supporting text which would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM1	In addition, there is a need to deliver an 8m buffer to the watercourse running to the north of the site as part of any development on Site 1, to form a wildlife buffer zone, which should be free from all built development and any formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and be appropriately retained and managed throughout the lifetime of the development. <u>Before site</u>	The site is an urban, brownfield site, in proximity to a watercourse. There may be opportunity for biodiversity enhancement through development of the site. The plan has been strengthened to stipulate that, prior to development, investigation and mitigation of potential for habitat fragmentation, habitat enhancement (including helping to achieve

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
	<p><u>development takes place the following effects will need to be investigated and mitigated: the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets).</u></p>	<p>BAP targets) should be undertaken. This will help to identify BAP resources which could be enhanced through the development.</p> <p><b>Screening conclusion: a minor positive impact is predicted in relation to objective SA6. Please see Appendix 1.</b></p>
Site WM1	<p>Utilities</p> <p><u>Access to national grid / capacity of grid for local energy production?</u></p> <p><u>Due to the site’s proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u></p>	<p>This is a minor change to provide additional clarification to the requirements for Site WM1 in terms of utilities, which would not change the sustainability performance of the plan.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>
Site WM1	<p><u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u></p>	<p>A significant positive effect on landscape and visual amenity was identified within the SA for Site WM1, due to its low visibility. Therefore, this is a minor change to supporting text which would not change the sustainability performance of the plan.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>
Site WM2	<p><u>Before site development takes place the following effects will need to be investigated and mitigated: the potential on the site for habitat fragmentation and habitat enhancement (including helping to achieve BAP targets). Air quality and noise should be assessed (in accordance with Policy WDM2) and mitigation put in place as necessary.</u></p>	<p>There may be opportunity for biodiversity enhancement through development of the site. The plan has been strengthened to stipulate that, prior to development, the investigation and mitigation of potential for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets) should be undertaken.</p> <p><b>Screening conclusion: a minor positive impact is predicted in relation to objective SA6. Please see Appendix 1.</b></p>
Site WM2	<p>Utilities</p> <p><u>Access to national grid / capacity of grid for local energy production?</u></p> <p><u>District heat network potential due to proximity to the city centre? Stand off distance from the railway line?</u></p> <p><u>Due to the site’s proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the</u></p>	<p>This is a minor change to provide additional clarification to the requirements for Site WM2 in terms of utilities, which would not change the sustainability performance of the plan.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>



<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
	<u>potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>	
Site WM2	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>	No potential landscape and visual impact is noted as significant within the SA. Therefore, this would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM3	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u> <u>The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or SAC will need to be assessed through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required."</u>	The plan has been strengthened to incorporate the suggested mitigation within the SA in relation to visual and landscape assessment. In addition, the plan has been strengthened to include the requirement for consideration of potential impacts on the river corridor (the SAP and/or SAC) <b>Screening conclusion: the assessment of the site in relation to objective SA5 has changed from a major negative to a neutral effect. Please see Appendix 1.</b>
Site WM3	Utilities <u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>	This is a minor change to provide additional clarification to the requirements for Site WM3 in terms of utilities, which would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM4	<u>Before site development takes place the following effects in particular will need to be investigated and mitigated: effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built environment and the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets). Air quality, noise and visual effects should be assessed and mitigation put in place as necessary due to residential receptors located nearby.</u>	The plan has been strengthened through the incorporation of mitigation measures identified within the SA. <b>Screening conclusion: the assessment of the site in relation to objective SA11 has changed from a minor negative effect to a neutral effect. Please see Appendix 1.</b>
Site WM4	Utilities <u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the</u>	This is a minor change to provide additional clarification to the requirements for Site WM4 in terms of utilities, which would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
	<u>potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>	
Site WM4	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>	Site WM4 may have a visual impact for localised receptors and the plan has been strengthened to require mitigation to be put in place where possible. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM5	<u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>	This is a minor change to provide additional clarification to the requirements for Site WM5 in terms of utilities, which would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM5	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>	The policy has been strengthened through the requirement for visual and landscape assessments to be carried out, and visual improvements to be sought, prior to its redevelopment. <b>Screening conclusion: the assessment of the site in relation to objective SA7 has changed from a minor negative effect to a neutral effect. Please see Appendix 1.</b>
Site WM6	<u>Before site development takes place the following effects in particular will need to be investigated and mitigated: effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built environment and the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets).</u>	The plan has been strengthened through the incorporation of mitigation measures identified within the SA. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM6	Utilities <u>Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.</u>	This is a minor change to provide additional clarification to the requirements for Site WM6 in terms of utilities, which would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Site WM6	<u>Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;</u>	The SA considers it unlikely that the redevelopment of the site would result in a landscape impact; however, it is identified that some mitigation for visual impact may be required for localised

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
		<p>receptors. Therefore, the plan has been strengthened through incorporation of the requirement for visual and landscape assessment.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>
Paragraph 5.3	<p>The key issues for Bradford District in relation to the management of Construction, Demolition and Excavation Waste (CDEW) are:</p> <p>CDEW arisings form a significant proportion of total waste arisings across Bradford District at the current time and forecast <del>into the future with arisings set exceed 490,000</del> <u>to reach 485,141</u> tonnes by 2030.</p> <p>CDEW arisings are likely to grow in the future linked to the District’s forecast population growth and the subsequent need for local planning of economic and housing development. This growth will stimulate additional waste arisings; The Council will encourage the management of CDEW waste (along with other waste streams) on-site at the point of origin with an emphasis on re-use and recycling, in accordance with the waste hierarchy. The Council considers this the most sustainable and environmentally sound solutions for management of Construction, Demolitions and Excavation Waste. <u>The Council are of the opinion the capacity gap for Construction and Demolition Waste can be addressed through a combination of an extant planning permission for CDEW management and the continuation of on-site management.</u></p>	<p>This is a minor change to supporting text which would not change the sustainability performance of the plan.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>
Paragraph 5.4	<p>Although the quantities of agricultural waste are quite significant, reaching <del>283,133</del> <u>296,902</u> tonnes by 2030, the quantities of agricultural waste for off-site management are very small at just over 2,000 tonnes and this is fragmented across facilities of various types</p>	<p>This is a minor change to supporting text which would not change the sustainability performance of the plan.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>
Paragraph 6.6	<p>Pre-application consultation with the Council is essential to establish what supporting information is likely to be required and is strongly encouraged as an important element of applying for permission for waste development. This is particularly so given the likely need for a supporting Environmental Impact Assessment (EIA), Transport Assessment, Health Impact Assessment and other impact related studies. Such liaison will also help ensure planning applications are processed efficiently and effectively. In accordance with the Localism Act and the NPPF, public</p>	<p>This is a minor change to supporting text which would not change the sustainability performance of the plan.</p> <p><b>Screening conclusion: no change to the results of the SA.</b></p>

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
	consultation with the local community is strongly encouraged at the earliest stage of waste development proposals, with the process of consultation on planning applications set out in the Council’s Statement of Community Involvement. <u>It is also advised applicants enter into discussions with the Environment Agency regarding Environmental Permits at the earliest opportunity to assist in identifying and responding to any key issues, which may need to be addressed.</u>	
Paragraph 6.16	All new and expanded developments will be required to demonstrate that any buildings associated with the development have regard to sustainable construction methods. <u>Applicants should be mindful of environmental management regulations and best practice during the on-site use and recovery of CDEW to ensure it does not cause undue nuisance to surrounding communities.</u>	This is a minor change to supporting text which would not change the sustainability performance of the plan. <b>Screening conclusion: no change to the results of the SA.</b>
Policy WDM2	j) The applicant must demonstrate any biodiversity enhancement has been fully investigated through an ecological assessment <u>and adverse effects on European Designated Sites are avoided through appropriate mitigation;</u> and	The policy has been strengthened to incorporate the mitigation measure proposed by the Habitat Regulations Assessment (HRA) screening assessment. <b>Screening conclusion: the assessment of the policy in relation to objective SA7 has changed from a minor negative effect to a minor positive effect. Please see Appendix 1.</b>
Policy WDM2	d) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised, <u>and where possible enhancements made, onto:</u>	The policy has been strengthened to include reference to enhancement in relation to landscape and visual amenity, cultural heritage, ecology, the water environment and transport. This incorporates a number of mitigation measures set out in the SA. <b>Screening conclusion: the assessment of the policy in relation to objectives SA5, SA6 and SA7 has changed from a minor negative effect to a minor positive effect. Please see Appendix 1.</b>
Policy WDM2	e) The impacts of the proposed waste management facility are adequately assessed and the applicant can demonstrate that adverse effects are minimised, <u>and where possible enhancement made, in terms ofto:</u>	The policy has been strengthened to include reference to enhancement in relation to environmental, social or economic effects; human health; noise; vibration; dust; odour; water, ground, air or light pollution; and climate change. This

<b>Screening the Proposed Changes – Bradford Waste Management DPD</b>		
		incorporates a number of mitigation measures set out in the SA. <b>Screening conclusion: no change to the results of the SA.</b>
Policy WDM5	<p>Residual landfill development proposals will be permitted where: Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised on:</p> <ul style="list-style-type: none"> <li>• Designated protected areas of landscape, historic or nature conservation <u>including habitat loss or fragmentation</u>;</li> <li>• Visual and landscape amenity;</li> <li>• Floodplains, groundwater or water quality;</li> <li>• Transport accessibility, capacity and the need to travel <u>including investigating the potential of transporting waste by non-road transport modes</u>;</li> </ul>	<p>The policy has been strengthened to incorporate mitigation measures proposed in relation to objectives SA5 and SA10.</p> <p><b>Screening conclusion: the assessment of the policy in relation to objective SA5 has changed from a minor negative effect to a neutral effect. Please see Appendix 1.</b></p>

### 3. LIKELY SIGNIFICANT CUMULATIVE EFFECTS

Cumulative effects are considered in two ways in SA:

- Cumulative effects considering the potential effects of other programmes and plans in combination with the effects of the Local Plan; and
- Cumulative effects of the policies / proposals within the plan and how they interact with each other.

The cumulative effects of the plans have already been assessed in section 7.3 of the Submission Draft SA report (May 2016).

This assessment has been validated as part of this work to review whether the assessment has changed. It is confirmed that the cumulative assessment has not significantly changed in response to the proposed modifications. This is due to the fact that the many of other plans and programmes assessed are appropriate to different areas to the Plan, while no change is considered relevant to the cumulative assessment of those that coincide with some of the site allocations within the Plan. In addition, the proposed modifications will not lead to significant changes to the overall results of the SA, as all of the sites are in built up areas and this will minimise the risk of cumulative effects.

**Screening conclusion: no change to the results of the SA.**

**APPENDIX 1**  
**UPDATED ASSESSMENT MATRICES**

