## **Waste Management DPD Proposed Modifications**

Proposed minor modifications are changes that can be made to the Local Plan but do not relate to soundness. The changes relate to factual updating, clarification and corrections to grammar and presentation. The following minor modifications are changes that have arisen through the Representations Received and Inspectors initial questions.

The table includes a brief explanation of the reason for the additional modification.

In terms of presentation, the deletion of text is denoted with a 'strike through' (strike through), with inserted new text as bold underlined (new text).

Page and paragraph numbers relate to the Waste Management DPD as submitted: Submission Document reference WM-SD-001

Modification Page Number No.		Policy /	Proposed Modification	Reason for Modification
		Paragraph		
MM1	2	1.7	The Council have previously consulted on the Issues and Options and	These paragraphs refer to
			Preferred Approach versions of the Waste Management DPD in autumn	the previous formal public
			2009, January - April 2011 and again in October - November 2011	consultation stage prior to
			respectively. The Issues and Options paper set out the key issues and	submission and should be
			options faced for waste management within Bradford District including	deleted as they are no
			those relating to amount, location, and handling of waste arisings at the	longer relevant.
			current time within the District, and the objectives for the future. The	
			Preferred Approach Report identified the policy direction and approach to	
			waste management, setting out the alternative approaches that the Council	
			could take in relation to different waste arisings.	
MM2	2	1.8	This document sets out the waste policies including amendments made	Factual Update
1411412		1.0	from the Preferred Approach version of the document based on the findings	ractual opuate
			of public consultation and the sustainability appraisal of the Issues and	
			Options, Preferred Approach, and Preferred Approach: Revised Chapter 5	
			and Publication Draft. The policies also incorporate updated information to	
			reflect the latest evidence available at publicationadoption. An analysis of	
			the consultation responses received and the resulting modifications are set	
			out in the accompanying Statement of Consultation documents.	
MM3	2	1.9,1.10 and	How Do I Get Involved?	These paragraphs refer to
		1.11		the previous formal public
			1.9 This document will be published for public consultation over a [insert	consultation stage prior to

Modification	Page	Policy /	Proposed Modification	Reason for Modification
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			number] week period commencing [insert date] and ending [insert date].  1.10 Hard copies will be made available for reference at the main planning offices and libraries as set out in the Engagement Plan.  1.11 The Engagement Plan sets out the proposed methods to be used as part of the engagement in line with the adopted Statement of Community Involvement. This will seek to assist the public and other interest organisations and bodies to find out more about the document and help them engage with the process and submit comments.	submission and should be deleted as they are no longer relevant.
MM4	3	1.12, 1.13, 1.14 and 1.15	1.12 Comments are invited using the online Comment Form or the paper comment forms available upon request. While comments not using the form will be accepted those making comments are encouraged to use the form to assist both the Council in processing representations but also any Inspectors consideration of comments. Please note that representations cannot be treated as confidential and will be made available on the council's website.  1.13 The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities, such as email, to make their responses in this way. Comments should be returned to the Council by using: Email: planning.policy@bradford.gov.uk.	These paragraphs refer to the previous formal public consultation stage prior to submission and should be deleted as they are no longer relevant.

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			1.14 Where it is not possible to comment using electronic means,	
			representations can be sent via mail to: Bradford District Local Plan City of	
			Bradford MDC Development Plans Team 2nd Floor (South) Jacobs Well	
			Manchester Road Bradford BD1 5RW Hand Delivered to the following	
			planning office (Mon - Thurs 9am to 5pm, Fri 9am to 4.30pm): Jacobs Well	
			Ground floor reception Manchester Road Bradford BD1 5RW	
			1.15 If you have any queries regarding the Area Action Plan or the	
			consultation process please contact the Development Plans team on 01274	
			433679 or email planning.policy@bradford.gov.uk.	
MM5	3	1.16	What happens next? 1.16 After the Publication Draft stage the Council will	These paragraphs refer to
			consider the comments received and consider whether any modifications	the previous formal public
			need to be made to the plan before submitting the AAP to the Government.	consultation stage prior to
			The AAP will then be considered by an independent inspector at a public	submission and should be
			examination. The Inspector's role is to consider whether the plan can be	deleted as they are no
			considered to be sound having regard to a number of factors including the	longer relevant.
			plans compliance with national planning policy. The Examination process	
			may result in a judgment that the plan would be sound if subject to a	
			number of modifications. If modifications are necessary these would be	
			published by the Council and subject to consultation before adopting the	
			AAP through a meeting of the Full Council.	
MM6	5	Vision	Bradford needs to take responsibility for the waste it generates, undertaking	Amendment made to
			a step-change in the way it manages its waste, through more sustainable	incorporate Outstanding

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			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, model shift in the transportation of waste arisings and crossboundary working where appropriate. This will aid in climate mitigation and adaptation	Mitigation put forward in the Sustainability Appraisal.
MM7	6	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 <a href="mailto:andenhances">and enhances</a> the District's environmental assets and safeguards human health"	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
waste industry necessary bey planned for in issues includir by sustainable		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, transportation of waste arisings by sustainable transport modes and locating of facilities near to source must be managed and planned for collectively where possible	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.

Modification	Page	Policy /	Proposed Modification	Reason for Modification
Number	No. Paragraph			
MM9	10	2.19	The Waste Management DPD therefore does consider opportunities for joint crossboundary working on waste matters and also reflects the possibility of a continued Bradford and Calderdale joint initiative for Municipal Solid Waste management facilities. need to work closely with neighbouring authorities.	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM10	11	Policy W1	Work collaboratively to promote (where possible) modal shift in the movement of waste from road to more sustainable forms of transport.	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM11	12	3.2	Analysis is based on the most recently available information from the Environment Agency's Waste Data Interrogator (20122013) together with other data obtained from the Environment Agency, the Council's own records and forecast waste arisings as presented within the Environmental Agency's North West Commercial and Industrial Waste Survey 2009 (Published 2012) and Defra's National Commercial and Industrial Survey 2009 (2012) as one of the best data and evidence sources. A detailed explanation of the methodology and sources used to calculate waste arisings and forecasts is included in the Evidence Base Report. Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study	Factual Update
MM12	12	Table 1	Table 1: Summary Current Total Waste Arisings in Bradford (2012)	

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Number No.		Paragraph		
			Type of Waste Arising Arisings (Tonnes)	
			Agricultural Waste <del>283,132</del> <b>296,902</b> <del>20.204</del> <b>24.1%</b>	
			Commercial Waste 254,314 <u>18.20</u> <u><b>20.7%</b></u>	
			Industrial Waste 219,773 <u>15.71</u> <u>17.8%</u>	
			Construction Demolition and Excavation Waste 350,000 214,306 25.02% 17.4%	
			Hazardous Waste <del>19,155</del> <u><b>19,084</b></u> <del>1.37%</del> <b>1.6%</b>	
			Local Authority <del>272, 668</del> <b>226,085</b> <del>19.50</del> <b>18.4%</b>	
			Total*** 1,399,042 100 1,230,464	
			Waste Water** 1,024,568 Type of Waste Arising Arisings (Tonnes)	
			Source: Environment Agency Waste Data Interrogator (WDI) 2012 2013*. Yorkshire Water 2014**. Total Being Planned for in the Waste Management DPD through either planning policy or site allocations or a combination of both***	

Modification Number	Page No.	Policy / Paragraph	Proposed Modification					Reason for Modification	
MM13	13	Table 2	Table 2: Forec	sting Model	Waste Strea	m			Factual change following update to waste needs assessment (2016).
			Waste Stream	<del>2013</del>	2015	2020	2025	2030	
			Agricultural Waste*	<del>283,133</del>	283,133 296,902	283,133 296,902	283,133 296,902	283,133 296,902	
			Commercial and Industrial Waste*	513,830	<del>538,326</del> <b>498,621</b>	<del>558,882</del> <b>522,078</b>	<del>580,329</del> <b>546,797</b>	<del>602,721</del> <b>572,863</b>	
			CDEW*	447,604	455,709 443,504	472,360 456,971	483,800 470,844	495,515 485,141	
			Hazardous Waste*	19,153	19,764 19,338	<del>20,267</del> <b>20,386</b>	20,782 22,066	21,311 23,570	
			Local Authority	226,085	227,880	257,738	268,780	279,282	

Modification	Page	Policy /	Proposed Modification		Reason for Modification
Number	No.	Paragraph			
			Collected 346,067 391,419 Waste – Bradford**	408,189 424,133	
			Total 1,489,805 1,524,812 1,592,380 Tonnes 1,604,432 1,687,750		
MM14	13	3.3	3.3 The projected forecast waste arisings for Brad most reliable and robust data available for each ware taking forward have adopted a 'Growth' based growth rate of 33% estimated GVA for all the wast Industrial, Agricultural, CDEW and Hazardous. A see been applied to Local Authority Collected Waste.	il s a al,	
MM15	13	3.4	As illustrated in Table 2, the projected waste force growth in waste arisings across the District between		· ·
MM16	13	3.7	Future monitoring of the evidence base underping inform and adjust the levels of waste arisings to be information relating to the methodology used in tarisings, can be found in accompanying Evidence Assessment, Capacity Gap Analysis and Site/Facil	e planned for. More ne forecasting of waste Base Report. Waste Nee	d <u>s</u>

Modification	Page	Policy /	Proposed Modification	Reason for Modification			
Number	No.	Paragraph					
MM17	14	3.8	It must be made clear at this point the allocating have only allocated sites for treatment of Local Authority Collected	Factual Update			
			Industrial Waste (C&I). This strategic a factors:	approach is based on the following			
MM18	14	3.9	•	The management of all other waste streams (agricultural, CDEW and Hazardous) shall be are planned for on a policy based criteria approach.			
MM19	15	Table 3	Waste Management	Existing Capacity Gap (Tonnes)	Factual change following update to waste needs		
			Landfill (non-hazardous)	<del>59,439</del> <b>61,655</b>	assessment (2016).		
			Landfill (hazardous)	74–5,035			
			Landfill (CD&E)	<del>201,200-</del> <b>74,945</b>			
			Energy recovery (LACW & C&I)	<del>203,169</del> - <b>102,346</b>			
			Incineration (Specialist High Temp)	833-861			
			Recycling (C&I and LACW)	400,084 444,225			
			Recycling (aggregates CD&E)	<del>112,975</del> - <b>334,834</b>			
			Recycling (specialist materials—including metal recycling, End of	<del>-1,059</del> - <b>-2,306</b>			

Modification Number	Page No.	Policy / Paragraph	Proposed Modification			Reason for Modification
			Life Vehicles and WEEE	Ξ		
			Composting		34,340 <b>4,421</b>	
			Residual Mechanical Tr	reatment	<del>109,146</del> <b>195,277</b>	
			Treatment Plant (include Anaerobic Digestion, specific treatment of biodegrade and wastes, organic wastreatment by distillation	pecialised dable liquids aste	- <del>52,376</del> <u><b>46,643</b></u>	
MM20	16	Policy W2	There is a requirement to accommodate for 1,681,962 1,802,609 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.		e, update to waste needs d assessment (2016).	
MM21	16	Policy W2 Table 4	Waste Stream  Agricultural Waste*	Capacity Requ	irements by 2030 (Tonnes)  283,133	Factual change following update to waste needs assessment (2016).

Modification Number	Page No.						Policy / Paragraph	Proposed Modification	Reason for Modification
				296,902					
			Commercial and Industrial Waste*	602,721					
				572,863					
			CDEW*	495,515					
				485,141					
			Hazardous Waste*	<del>21,311</del>					
				23,570					
			Local Authority	279,282					
			Collected Waste – Bradford**	424,133					
			Total Tonnes	1,681,962					
				1,802,609					
MM22	16	WM2	A range of appropriate waste manageme <u>allocated</u> for Local Authority Collected W		Factual Update				
			Industrial Waste (C&I), providing capacity						

Modification	Page	Policy /	<b>Proposed Modification</b>			Reason for Modification	
Number	No.	Paragraph					
			· · ·	t the recycling target is LACW and C&I waste ntly sought, in order to d choice. This will ensu	s not met. There is a need to that already permitted or o provide a suitable level of ure waste operators can		
MM23	17	4.1 and 4.2	requirement for new wast DPD. This can be extrapola approximately 50,000 – 70 treatment technologies. T	The established capacity gap is now needed to be translated into a land requirement for new waste management facilities to be allocated within the DPD. This can be extrapolated by working on a broad estimate-of approximately 50,000 – 70,000 tonnes per hectare of most standard treatment technologies. This equates to a minimum need of approximately 17 hectares of developable land for allocated waste management sites of various sizes and distributed across the District. based on the following:			
			Facility Type	Tonnage	Land Take	assessment (2016).	
			Materials Recycling/Reprocessing Facilities (LACW & C&I waste)	128,000 tonnes	1 ha		
			Materials Recycling/Reprocessing	63,000 tonnes	1 ha		

Modification Number	Page No.	Policy / Paragraph	Proposed Modification			Reason for Modification
			Facilities (C&D waste)			
			Non-hazardous non- inert landfill	100,000 to 500,000 tonnes (or the equivalent void space)	N/A	
			Non-hazardous inert landfill	100,000 tonnes	N/A	
			Hazardous landfill	20,000 tonnes	N/A	
			Composting	25,000 to 35,000 tonnes.	1 – 2 ha	
			Energy Recovery	100,000 – 200,000 tonnes	2 – 3 ha	
			Residual Mechanical Treatment	100,000 tonnes	1 ha	
			Management DPD (17.6 required under the capa	tares of the sites set out in the manager of the sites set out in the manager of the following research the following research of the following research.	aximum land take us land take	

Modification	Page	Policy /	Proposed Modification	Reason for Modification
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			Providing a choice and mix of potential waste management sites across	
			the District is important to support waste hierarchy objectives;	
			• It ensures flexibility of the Plan respond to future circumstances and	
			changing approaches to waste management including technological	
			advancement;	
			An appropriate mix of sites will help accommodate different waste	
			streams allowing waste operators flexibility to develop the necessary	
			waste management facilities the District needs.	
			More information relating to the methodology of calculating 'Need' and the	
			'capacity gap', can be found in the accompanying Evidence Base Report.	
			Waste Needs Assessment, Capacity Gap Analysis and Site/Facility	
			Requirements Study.	
			4.2-Providing a choice and mix of potential waste management sites across	
			the District is important to support waste hierarchy objectives. An	
			appropriate mix of sites will help accommodate different waste streams	
			(particularly MSW and C&I waste) allowing waste operators flexibility to	
			develop the necessary waste management facilities the District needs.	
MM24	17	4.3	A comprehensive site assessment <sup>1</sup> has been undertaken to identify the	Factual update
			short list of potential site allocations for waste management set out in	
			Policy W3. A long list of sites comprising of existing employment allocations	

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			(from the Replacement Unitary Development Plan) and sites submitted	
			through the call for sites process have been evaluated through the first	
			stage of the site assessment process. The list of sites not excluded by stage	
			1 were then further evaluated using a traffic light system to assess which	
			were most appropriate for waste management facilities.	
MM25	17	4.5	A number of sites have been shortlisted allocated as having potential to accommodate more than one type of waste management facility, subject to Environmental Permits being obtained. Any development proposals on	Factual update
			shortlisted allocated 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.	
MM26	18	W3	The following sites are identified as suitable allocations have been allocated	Factual Update
			for waste management facilities, with sufficient capacity, in the context of	
			waste arisings currently and forecast and sub-regional supply for LACW and	
			C&I, to meet need over the plan period:	
			• Site WM1 (Formerly Site 1): Princeroyd Way, Ingleby Road, Listerhills	
			• Site WM2 (Formerly Site 11): Ripley Road, Bowling	
			• Site WM3 (Formerly Site 78): Aire Valley Road, Keighley	
			• Site WM4 (Formerly Site 92): Bowling Back Lane Household Waste	

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Number	No.	Paragraph		
			Collection and Recycling Site	
			• Site WM5 (Formerly Site 104): Merrydale Road, Euroway	
			• Site WM6 (Formerly Site 121): Steel Stock and Scrapholders Site, Birkshall	
			Lane Further information on these sites are in the following section.	
MM27	21	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. Before site 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).	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM28	23	Site WM2	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.	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM29	25	Site WM3	Visual and landscape assessment would be required due to the sites	Amendment made to

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			visibility and prominence within the area. Visual improvements to the site	incorporate Outstanding
			should be sought through its redevelopment; The potential effects of a	Mitigation put forward in
			waste management use could be avoided by the plan stating that an	the Sustainability
			incinerator, gasification and/or pyrolysis plant is not operated on that site.	Appraisal.
			Alternatively, potential effects of an incinerator, gasification and / or	
			pyrolysis plant would need to be assessed through a project level	
			Appropriate Assessment (AA).	
MM30	27	Site WM4	Before site development takes place the following effects in particular will	Amendment made to
			need to be investigated and mitigated: effects on the two Listed Buildings	incorporate Outstanding
			west of the site, the effect on the quality of the surrounding built	Mitigation put forward in
			environment and the potential on the site for habitat fragmentation,	the Sustainability
			habitat enhancement (including helping to achieve BAP targets). Air	Appraisal.
			quality, noise and visual effects should be assessed and mitigation put in	
			place as necessary due to residential receptors located nearby.	
MM31	29	Site WM5	Air quality and noise assessment and appropriate mitigation will be	Amendment made to
			required in order to ensure there are no negative effects on sensitive	incorporate Outstanding
			receptors.	Mitigation put forward in
				the Sustainability
				Appraisal.
MM32	31	WM6	Before site development takes place the following effects in particular will	Amendment made to
			need to be investigated and mitigated: effects on the two Listed Buildings	incorporate Outstanding
			west of the site, the effect on the quality of the surrounding built	Mitigation put forward in

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			environment and the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets).	the Sustainability Appraisal.
MM33	42	WDM2 (j)	j) The applicant must demonstrate any biodiversity enhancement has been fully investigated through an ecological assessment and <u>adverse effects on</u> <u>European Designated Sites are avoided</u> ; and	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM34	42	WDM2 (d)	d) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised, and where possible enhancements made, onto:	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM35	42	WDM2 (2)	The impacts of the proposed waste management facility are adequately assessed and the applicant can demonstrate that adverse effects are minimised, and where possible enhancement made, in terms of to:	Amendment made to incorporate Outstanding Mitigation put forward in the Sustainability Appraisal.
MM36	47	WDM5	a) d) Residual landfill development proposals will be permitted where: a) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised on:	Correction of a numbering error.

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			Designated protected areas of landscape, historic or nature conservation	Amendment made to
			including habitat loss or fragmentation;	incorporate Outstanding
				Mitigation put forward in
			Visual and landscape amenity;	the Sustainability
			Floodplains, groundwater or water quality;	Appraisal.
			Transport accessibility, capacity and the need to travel including	
			investigating the potential of transporting waste by non-road transport	
			modes;	
MM37	47	WDM5	b) e) The impacts are adequately assessed and the applicant can	Correction of a numbering
			demonstrate that adverse effects are minimised in terms of:	error.
			Environmental, social or economic effects;	
			• Human Health;	
			Noise, vibrations, dust, odour;	
			Water, ground, light or air pollution	
			e) f) The design, siting and external appearance of buildings and structures	
			associated with the development of the landfill are of a scale, mass, form	
			and character appropriate to its location and landscape setting;	
			d) g) The facility's design and operation maximises opportunities to recover	

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			energy and to make efficient use of heat and water resources;	
			e) h) The applicant can demonstrate the mitigation of waste treatment and	
			HGV associated emissions including the consideration on cleaner fuels and	
			technologies capable of reducing emissions.	