

Waste Management DPD Schedule of Proposed Modifications

The document puts forward a number of modifications to the Submission Draft of the Waste Management DPD with document reference WM-SD-001.

Proposed modifications consist of two types of modifications.

1. Major Modification (MM) – These are significant changes to the document which relate to the soundness of the 'Plan, with reference MM##.
2. Additional Modification (AM) – These are minor changes to the document which are not considered to relate to the soundness of the 'Plan, with reference AM##.

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

Main Modifications (MM)

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
MM1	5	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>	To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i> , a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal. This will ensure plan

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				has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.
MM2	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 and enhances the District's environmental assets and safeguards human health"	To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i> , a modification is proposed to incorporate 'Outstanding

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				<p>Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.</p>
MM3	6	Objective 5	<p>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</p>	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable</p>

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				<p>alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.</p>

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MM4	10	2.19	<p>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. <u>need to work closely with neighbouring authorities.</u></p>	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of</p>

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				<p>Planning Applications in accordance with Section 7 of the NPPW.</p>
MM5	11	Policy W1	<p><u>Work collaboratively to</u> promote (where possible) modal shift in the movement of waste from road to more sustainable forms of transport.</p>	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with</p>

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				Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.
MM6	12	Table 1	<p>Table 1: Summary Current Total Waste Arisings in Bradford (20122013)</p> <p>Type of Waste Arising Arisings (Tonnes)</p> <p>Agricultural Waste 283,132 296,902 20.204 20.6%</p> <p>Commercial Waste 254,314 18.20 17.6%</p> <p>Industrial Waste 219,773 15.71 14.2%</p> <p>Construction Demolition and Excavation Waste 350,000 440,000 25.02% 30.6%</p> <p>Hazardous Waste 19,155 19,084 1.37% 1.3%</p> <p>Local Authority 272,668 226,085 19.50 15.7%</p> <p>Total*** 1,399,042 100 1,456,158</p>	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of the Plan and thus is fully <i>Justified</i> , a modification is proposed following update to waste needs assessment (2016). This is considered in accordance with Section 2 of the

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			<p>Waste Water** 1,024,568 Type of Waste Arising Arisings (Tonnes)</p> <p>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***</p>	National Planning Policy for Waste and the Test of Soundness.																								
MM7	13	Table 2	<p>Table 2: Forecast Waste Arisings in Bradford (201315–30) using Bradford Waste Forecasting Model Waste Stream</p> <table border="1" data-bbox="618 810 1525 1388"> <thead> <tr> <th data-bbox="618 810 786 914">Waste Stream</th> <th data-bbox="797 810 931 914">2013</th> <th data-bbox="943 810 1077 914">2015</th> <th data-bbox="1088 810 1223 914">2020</th> <th data-bbox="1234 810 1368 914">2025</th> <th data-bbox="1379 810 1525 914">2030</th> </tr> </thead> <tbody> <tr> <td data-bbox="618 922 786 1058">Agricultural Waste*</td> <td data-bbox="797 922 931 1058">283,133</td> <td data-bbox="943 922 1077 1058">283,133 296,902</td> <td data-bbox="1088 922 1223 1058">283,133 296,902</td> <td data-bbox="1234 922 1368 1058">283,133 296,902</td> <td data-bbox="1379 922 1525 1058">283,133 296,902</td> </tr> <tr> <td data-bbox="618 1066 786 1249">Commercial and Industrial Waste*</td> <td data-bbox="797 1066 931 1249">513,830</td> <td data-bbox="943 1066 1077 1249">538,326 498,621</td> <td data-bbox="1088 1066 1223 1249">558,882 522,078</td> <td data-bbox="1234 1066 1368 1249">580,329 546,797</td> <td data-bbox="1379 1066 1525 1249">602,721 572,863</td> </tr> <tr> <td data-bbox="618 1257 786 1388">CDEW*</td> <td data-bbox="797 1257 931 1388">447,604</td> <td data-bbox="943 1257 1077 1388">455,709 443,504</td> <td data-bbox="1088 1257 1223 1388">472,360 456,971</td> <td data-bbox="1234 1257 1368 1388">483,800 470,844</td> <td data-bbox="1379 1257 1525 1388">495,515 485,141</td> </tr> </tbody> </table>	Waste Stream	2013	2015	2020	2025	2030	Agricultural Waste*	283,133	283,133 296,902	283,133 296,902	283,133 296,902	283,133 296,902	Commercial and Industrial Waste*	513,830	538,326 498,621	558,882 522,078	580,329 546,797	602,721 572,863	CDEW*	447,604	455,709 443,504	472,360 456,971	483,800 470,844	495,515 485,141	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of the Plan and thus is fully <i>Justified</i> , a modification is proposed following update to waste needs assessment (2016). This is considered in accordance with Section 2 of the National Planning
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			Hazardous Waste*	19,153 <u>19,338</u>	19,764 <u>20,386</u>	20,267 <u>20,386</u>	20,782 <u>22,066</u>	21,311 <u>23,570</u>	<p>Policy for Waste and the Test of Soundness.</p> <p>The changes in the waste figures are due to the following:</p> <p>Agricultural – Small increase in the number of farm holdings within the district since 2014.</p> <p>Commercial and Industrial Waste – Secondary Products / Processes have now been removed from this figure as it was considered to be double counting.</p> <p>CDEW – There has been an increase in building activity since the recession, but the forecast for CDEW has actually</p>
Local Authority Collected Waste – Bradford**	226,085 <u>200,419</u> ¹	227,880 <u>226,684</u> ²	257,738 <u>236,396</u> ³	268,780 <u>245,629</u> ⁴	279,282				
Total Tonnes	1,489,805 <u>1,458,784</u>	1,524,812 <u>1,523,021</u>	1,592,380 <u>1,550,939</u>	1,636,824 <u>1,624,105</u>	1,681,962				
¹ 145,648 tonnes of Secondary Waste generated for Residual Mechanical Treatment			² 164,735 tonnes of Secondary Waste generated for Residual Mechanical Treatment			³ 171,793 tonnes of Secondary Waste generated for Residual Mechanical Treatment			
⁴ 178,504 tonnes of Secondary Waste generated for Residual Mechanical Treatment									

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					<p>decreased slightly.</p> <p>Hazardous Waste – There has been a slight increase in Hazardous Waste Arisings, as indicated by the Hazardous Waste Data Interrogator.</p> <p>Local Authority Collected Waste – This figure has decreased significantly as it no longer incorporates the secondary waste products as this was considered double counting.</p>								
MM8	15	Table 3	<table border="1"> <thead> <tr> <th data-bbox="622 1153 1070 1209">Waste Management</th> <th data-bbox="1081 1153 1518 1209">Existing Capacity Gap (Tonnes)</th> </tr> </thead> <tbody> <tr> <td data-bbox="622 1217 1070 1273">Landfill (non-hazardous)</td> <td data-bbox="1081 1217 1518 1273">59,439 61,655</td> </tr> <tr> <td data-bbox="622 1281 1070 1337">Landfill (hazardous)</td> <td data-bbox="1081 1281 1518 1337">74 5,035</td> </tr> <tr> <td data-bbox="622 1345 1070 1417">Landfill (CD&E)</td> <td data-bbox="1081 1345 1518 1417">201,200 74,945</td> </tr> </tbody> </table>		Waste Management	Existing Capacity Gap (Tonnes)	Landfill (non-hazardous)	59,439 61,655	Landfill (hazardous)	74 5,035	Landfill (CD&E)	201,200 74,945	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of the Plan and thus is
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MM9	16	Policy W2	There is a requirement to accommodate for 1,681,962 <u>1,624,105</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	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of																

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			authority areas, in line with European and national policy guidance.		the Plan and thus is fully <i>Justified</i> , a modification is proposed following update to waste needs assessment (2016). This is considered in accordance with Section 2 of the National Planning Policy for Waste and the Test of Soundness.
MM10	16	Policy W2 Table 4	Waste Stream	Capacity Requirements by 2030 (Tonnes)	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of the Plan and thus is fully <i>Justified</i> , a modification is proposed following update to waste needs assessment (2016). This is
Agricultural Waste	283,133 <u>296,902</u>	Commercial and Industrial Waste	602,721 <u>572,863</u>		
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MM11	17	4.1 and 4.2	<p>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. <u>based on the following:</u></p> <p><u>Table 5 – Site Size Assumptions</u></p> <table border="1"> <thead> <tr> <th>Facility Type</th> <th>Tonnage</th> <th>Land Take</th> </tr> </thead> <tbody> <tr> <td>Materials Recycling/Reprocessing Facilities (LACW & C&I</td> <td>128,000 tonnes</td> <td>1 ha</td> </tr> </tbody> </table>	Facility Type	Tonnage	Land Take	Materials Recycling/Reprocessing Facilities (LACW & C&I	128,000 tonnes	1 ha	To ensure the plan is based upon the most up to date, robust and credible proportionate evidence is used in the production of the Plan and thus is fully Justified, a modification is proposed following update to waste needs assessment (2016). This is												
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Materials Recycling/Reprocessing Facilities (LACW & C&I	128,000 tonnes	1 ha																				

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			waste)			<p>considered in accordance with Section 2 of the National Planning Policy for Waste and the Test of Soundness.</p> <p>Resulting modification to the text to clarify the justification for the number of proposed allocated sites and land take requirement.</p>
			Materials Recycling/Reprocessing Facilities (C&D waste)	63,000 tonnes	1 ha	
			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	
			<p><u>The total number of hectares of the sites set out in the Waste Management DPD (17.62ha) is greater than the maximum land take required under the capacity gap forecasts. A surplus land take requirement has been adopted for the following reasons:</u></p> <ul style="list-style-type: none"> ● <u>Providing a choice and mix of potential waste management sites across the District is important to</u> 			

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			<p><u>support waste hierarchy objectives;</u></p> <ul style="list-style-type: none"> ● <u>It ensures flexibility of the Plan respond to future circumstances and changing approaches to waste management including technological advancement;</u> ● <u>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.</u> <p>More information relating to the methodology of calculating 'Need' and the 'capacity gap', can be found in the accompanying Evidence Base Report. <u>Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study.</u></p> <p>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.</p>																												
MM12		Additional Table	<table border="1"> <thead> <tr> <th data-bbox="618 914 936 1062">Waste Management</th> <th data-bbox="936 914 1133 1062">Year</th> <th data-bbox="1133 914 1391 1062">Tonnage/year</th> <th data-bbox="1391 914 1615 1062">Min no new (additional) Facilities in year</th> <th data-bbox="1615 914 1861 1062">Size (ha)</th> </tr> </thead> <tbody> <tr> <td data-bbox="618 1062 936 1270" rowspan="3">Energy recovery (LACW & C&I)</td> <td data-bbox="936 1062 1133 1129">2015</td> <td data-bbox="1133 1062 1391 1129">100,404</td> <td data-bbox="1391 1062 1615 1129">1</td> <td data-bbox="1615 1062 1861 1129">2 – 3 ha</td> </tr> <tr> <td data-bbox="936 1129 1133 1201">2020</td> <td data-bbox="1133 1129 1391 1201">94,412</td> <td data-bbox="1391 1129 1615 1201">0</td> <td data-bbox="1615 1129 1861 1201">2 – 3 ha <u>N/A</u></td> </tr> <tr> <td data-bbox="936 1201 1133 1270">2030</td> <td data-bbox="1133 1201 1391 1270">102,346</td> <td data-bbox="1391 1201 1615 1270">0</td> <td data-bbox="1615 1201 1861 1270">2 – 3 ha <u>N/A</u></td> </tr> <tr> <td data-bbox="618 1270 936 1412" rowspan="2">Incineration (Specialist High Temp)</td> <td data-bbox="936 1270 1133 1342">2015</td> <td data-bbox="1133 1270 1391 1342">861</td> <td data-bbox="1391 1270 1615 1342"><1</td> <td data-bbox="1615 1270 1861 1342">N/A</td> </tr> <tr> <td data-bbox="936 1342 1133 1412">2020</td> <td data-bbox="1133 1342 1391 1412">861</td> <td data-bbox="1391 1342 1615 1412"><1</td> <td data-bbox="1615 1342 1861 1412">N/A</td> </tr> </tbody> </table>	Waste Management	Year	Tonnage/year	Min no new (additional) Facilities in year	Size (ha)	Energy recovery (LACW & C&I)	2015	100,404	1	2 – 3 ha	2020	94,412	0	2 – 3 ha <u>N/A</u>	2030	102,346	0	2 – 3 ha <u>N/A</u>	Incineration (Specialist High Temp)	2015	861	<1	N/A	2020	861	<1	N/A	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of the Plan and thus is fully <i>Justified</i> , a modification is proposed to demonstrate the required number of
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				2030	861	<1	N/A	facilities and the land take / size of each facility.
			Recycling (C&I and LACW)	2015	325,611	3	3 ha	
				2020	385,958	0	3 ha N/A	
				2030	444,225	1	4 ha 1 Ha	
			Recycling (aggregates CD&E)	2015	148,313	3	N/A <u>Extant PP in place in combination with onsite management</u>	
				2020	315,301	2	N/A <u>Extant PP in place in combination with onsite management</u>	
				2030	334,834	0	N/A <u>Extant PP in place in combination with onsite management</u>	
			Composting	2015	-16,692	Surplus	Surplus	
				2020	-649	Surplus	Surplus	

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				2030	4,421	<1	N/A		
			Residual Mechanical Treatment	2015	16,073	1	0.5 1 ha		
				2020	180,844	1	2 ha 1 ha		
				2030	195,277	0	4 ha N/A		
			<u>Total estimated additional land take</u>					<u>9 ha</u>	
MM13	17	4.5	<p>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.</p>					<p>To ensure the Plan is fully compliant with the National Planning Practice Guidance for Waste [Paragraph: 052 Reference ID: 28-052-20141016], the modification encouraging early engagement with the Environment Agency regarding permitting is considered necessary.</p>	
MM14	21	Site WM1	<p>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</p>					<p>To ensure Plan' has incorporated the</p>	

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			<p>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 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>most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				accordance with Section 7 of the NPPW.
MM15	21	Site WM1	<p>Utilities</p> <p>Access to national grid / capacity of grid for local energy production?</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>Due to the location of the site, it is considered appropriate to consider the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. This is considered compliant with Section 4 of the National Planning Policy for Waste. The Modification is also considered compliant with National Planning Practice Guidance in identifying decentralised energy opportunities.</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				[Paragraph: 009 Reference ID: 5-009-20140306]
MM16	21	Site WM1	<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>	To ensure the Plan is fully compliant with the National Planning Policy Framework (paras 58 & 109), National Planning Practice Guidance (Paragraph: 001 Reference ID: 8-001-20140306) and the locational criteria of Appendix B of the National Planning Policy Framework for Waste, this modification is considered necessary to ensure valued landscapes are protected through the requirement for

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				good design.
MM17	23	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>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.
MM18	23	Site WM2	<p>Utilities</p> <p>Access to national grid / capacity of grid for local energy production? District heat network potential due to proximity to the city centre? Stand off distance from the railway line?</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>	Due to the location of the site, it is considered appropriate to consider the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. This is considered compliant with Section 4 of the National Planning Policy for Waste. The Modification is also considered compliant with National Planning

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				Practice Guidance in identifying decentralised energy opportunities. [Paragraph: 009 Reference ID: 5-009-20140306]
MM19	23	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>	To ensure the Plan is fully compliant with the National Planning Policy Framework (paras 58 & 109), National Planning Practice Guidance (Paragraph: 001 Reference ID: 8-001-20140306) and the locational criteria of Appendix B of the National Planning Policy Framework for Waste, this modification is considered necessary to ensure valued landscapes

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				are protected through the requirement for good design.
MM20	25	Site WM3	<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><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></p>	<p>To ensure Plan’ has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate ‘Outstanding Mitigation’ put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.
MM21	25	Site WM3	<p>Utilities</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>	Due to the location of the site, it is considered appropriate to consider the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. This is considered compliant with Section 4 of the National Planning Policy for Waste. The Modification is also

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>considered compliant with National Planning Practice Guidance in identifying decentralised energy opportunities. [Paragraph: 009 Reference ID: 5-009-20140306]</p>
MM22	27	Site WM4	<p><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></p>	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.</p>
MM23	27	Site WM4	<p>Utilities</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>Due to the location of the site, it is considered appropriate to consider the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. This</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>is considered compliant with Section 4 of the National Planning Policy for Waste. The Modification is also considered compliant with National Planning Practice Guidance in identifying decentralised energy opportunities. [Paragraph: 009 Reference ID: 5-009-20140306]</p>
MM24	27	Site WM4	<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>To ensure the Plan is fully compliant with the National Planning Policy Framework (paras 58 & 109), National Planning Practice Guidance (Paragraph: 001 Reference ID: 8-001-20140306) and</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				the locational criteria of Appendix B of the National Planning Policy Framework for Waste, this modification is considered necessary to ensure valued landscapes are protected through the requirement for good design.
MM25	29	Site WM5	<u>Air quality and noise assessment and appropriate mitigation will be required in order to ensure there are no negative effects on sensitive receptors.</u>	To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i> , a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				Sustainability Appraisal.
MM26	29	Site WM5	<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>Due to the location of the site, it is considered appropriate to consider the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. This is considered compliant with Section 4 of the National Planning Policy for Waste. The Modification is also considered compliant with National Planning Practice Guidance in identifying decentralised energy opportunities.</p> <p>[Paragraph:</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				009 Reference ID: 5-009-20140306]
MM27	29	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>	To ensure the Plan is fully compliant with the National Planning Policy Framework (paras 58 & 109), National Planning Practice Guidance (Paragraph: 001 Reference ID: 8-001-20140306) and the locational criteria of Appendix B of the National Planning Policy Framework for Waste, this modification is considered necessary to ensure valued landscapes are protected through the requirement for good design.

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
MM28	31	Site WM6	<p><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></p>	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>Planning Applications in accordance with Section 7 of the NPPW.</p>
MM29	31	Site WM6	<p>Utilities</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>Due to the location of the site, it is considered appropriate to consider the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. This is considered compliant with Section 4 of the National Planning Policy for Waste. The Modification is also considered compliant with National Planning Practice Guidance in identifying</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				decentralised energy opportunities. [Paragraph: 009 Reference ID: 5-009-20140306]
MM30	31	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>	To ensure the Plan is fully compliant with the National Planning Policy Framework (paras 58 & 109), National Planning Practice Guidance (Paragraph: 001 Reference ID: 8-001-20140306) and the locational criteria of Appendix B of the National Planning Policy Framework for Waste, this modification is considered necessary to ensure valued landscapes are protected through the

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				requirement for good design.
MM31	33	5.3	<p>The key issues for Bradford District in relation to the management of Construction, Demolition and Excavation Waste (CDEW) are:</p> <ul style="list-style-type: none"> • CDEW arisings form a significant proportion of total waste arisings across Bradford District at the current time and forecast into the future with arisings set exceed 490,000 to reach 485,141 tonnes by 2030. • 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> 	To ensure the plan is based upon the most up to date, robust and credible evidence is used in the production of the Plan and thus is fully <i>Justified</i> , a modification is proposed following update to waste needs assessment (2016). This is considered in accordance with Section 2 of the National Planning Policy for Waste and the Test of Soundness.
MM32	35	5.4	Although the quantities of agricultural waste are quite significant, reaching 283,133 296,902 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	To ensure the plan is based upon the most up to date, robust and credible

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				evidence is used in the production of the Plan and thus is fully <i>Justified</i> , a modification is proposed following update to waste needs assessment (2016). This is considered in accordance with Section 2 of the National Planning Policy for Waste and the Test of Soundness.
MM33	40	6.6	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 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</u>	To ensure the Plan is fully compliant with the National Planning Practice Guidance for Waste [Paragraph: 052 Reference ID: 28-052-20141016], the modification

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<u>the earliest opportunity to assist in identifying and responding to any key issues, which may need to be addressed.</u>	encouraging early engagement with the Environment Agency regarding permitting is considered necessary.
MM34	42	WDM2 (j)	j) The applicant must demonstrate any biodiversity enhancement has been fully investigated through an ecological assessment and <u>adverse effects on European Designated Sites are avoided through appropriate mitigation</u> ; and	To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i> , a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.
MM35	42	WDM2 (d)	d) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised, <u>and where possible enhancements made, are to</u> :	To ensure Plan' has incorporated the most appropriate

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				Section 7 of the NPPW.
MM36	42	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</u> , in terms of <u>to</u> :	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				(NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.
MM37	44	6.14	<p>The Council will resist the loss of existing facilities and allocated sites unless there is no realistic prospect of the site being used for waste management purposes exceptional circumstances can be demonstrated. Exceptional Particular circumstances will need to demonstrate how the loss of an existing facility, or development of an allocated waste site for another unrelated purpose, does not adversely affect the Council’s ability to meet the District’s waste management vision and objectives.</p>	The Modification is required to ensure the policy is consistent with national guidance (NPPF).
MM38	44	WDM3	<p>The Council will resist the loss of existing facilities and allocated sites through redevelopment or change of use for any other purposes other than waste management, unless the applicant can demonstrate any of the exceptional particular circumstances exist:</p> <ul style="list-style-type: none"> a) There is no longer any identified need for the facility or site across any form of waste arising in the District and sub-region, and such a facility could be accommodated elsewhere; or b) The facility or site does not accord with Bradford’s core waste policies or cannot contribute to 	The Modification is required to ensure that the policy is consistent with national guidance (NPPF).

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p>the waste hierarchy's objectives; or</p> <p>c) The use of the facility or site for waste management activities are proved to be obsolete or economically unviable and market testing effectively demonstrates that other waste operators would not bring the site facility or site into use <u>there is no realistic prospect of the site being used for waste management purposes</u>; or</p> <p>d) An alternative, suitable waste facility site is identified elsewhere in the District enabling a site swap that is capable of satisfying the site location criteria for the waste management facility.</p>	
MM39	45	6.15	<p>The preferred policy sets out the objectives for the construction and operation of developments, <u>principally relating to waste management.</u></p>	<p>The modification is required to clarify the application of the policy and ensure that it is not taken out of context or extends the purpose and remit of the Waste Management DPD. This will ensure the policy is effective, fully justified and soundly based.</p>
MM40	45	6.16	<p>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</u></p>	<p>To ensure Plan' has incorporated the most appropriate</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p><u>CDEW to ensure it does not cause undue nuisance to surrounding communities.</u></p>	<p>strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				Section 7 of the NPPW.
MM41	45	WDM4	<p>WDM4: Waste Management within Development</p> <p>Proposals related to the expansion of existing and new developments will be permitted where they demonstrate:</p> <ul style="list-style-type: none"> a) The use of recycled and secondary materials for construction of the development, including the minimisation of waste resulting from construction; b) Energy efficient design, maximising, the on-site generation of electricity from the recovery and treatment of wastes and the provision of other renewable energy sources, including opportunities to contribute to climate change mitigation; c) Water efficient design, including where possible water recycling and sustainable drainage measures; d) That waste to be treated cannot practically and reasonably be reused, recycled or processed to recover materials; e) The appropriate management arrangements are in place for waste arisings generated by the development; f) Reduction in gases associated with adverse climate change; g) Design which minimises the disposal of waste and maximises the recovery and recycling of materials at the end of the development's life; and h) Maximise opportunities to contribute to climate change mitigation and priorities. <p>Where demolition needs to take place before construction, as far as possible, construction and</p>	<p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p>demolition waste should be recovered or recycled, preferably on-site. The applicant must also demonstrate the impacts of any proposed on-site management of construction and demolition waste are minimised in terms of:</p> <ul style="list-style-type: none"> • Environmental, social or economic effects; • Human Health; • Noise, vibrations, dust, odour; • Water, ground, light or air pollution; and • Climate Change 	<p>(NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.</p>
MM42	47	WDM5	<p>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:</p> <ul style="list-style-type: none"> • Designated protected areas of landscape, historic or nature conservation <u>including habitat loss or fragmentation;</u> • Visual and landscape amenity; • Floodplains, groundwater or water quality; • Transport accessibility, capacity and the need to travel <u>including investigating the potential of transporting waste by non-road transport modes;</u> 	<p>Correction of a numbering error.</p> <p>To ensure Plan' has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.</p>
MM43	50	Objective 3	<p>“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 and enhances the District’s environmental assets and safeguards human health”</p>	<p>To ensure Plan’ has incorporated the most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				<p>modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in accordance with Section 7 of the NPPW.</p>
MM44	50	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	To ensure Plan' has incorporated the

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p>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</p>	<p>most appropriate strategy when considered against reasonable alternatives and thus is fully <i>Justified</i>, a modification is proposed to incorporate 'Outstanding Mitigation' put forward in the Sustainability Appraisal.</p> <p>This will ensure plan has due regard to the local environment and is compliant with Section 5 of the National Planning Policy for Waste (NPPW), and will set a framework for the consideration of Planning Applications in</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
				accordance with Section 7 of the NPPW.

Additional Modifications (AM)

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
AM1	2	1.7	The Council have previously consulted on the Issues and Options and Preferred Approach versions of the Waste Management DPD in autumn 2009, January – April 2011 and again in October – November 2011 respectively. The Issues and Options paper set out the key issues and options faced for waste management within Bradford District including those relating to amount, location, and handling of waste arisings at the 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.	These paragraphs refer to the previous formal public consultation stage prior to submission and should be deleted as they are no longer relevant.
AM2	2	1.8	This document sets out the waste policies including amendments made from the Preferred Approach version of the document based on the findings 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 publication adoption . An analysis of the consultation responses received and the resulting modifications are set out in the accompanying Statement of Consultation documents .	Factual Update
AM3	2	1.9,1.10 and 1.11	How Do I Get Involved? 1.9 This document will be published for public consultation over a [insert number]-week period commencing [insert date] and ending [insert date].	These paragraphs refer to the previous formal public consultation stage prior to submission and should be

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p>1.10 Hard copies will be made available for reference at the main planning offices and libraries as set out in the Engagement Plan.</p> <p>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.</p>	<p>deleted as they are no longer relevant.</p>
AM4	3	1.12, 1.13, 1.14 and 1.15	<p>How to comment</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>These paragraphs refer to the previous formal public consultation stage prior to submission and should be deleted as they are no longer relevant.</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p>Ground floor reception Manchester Road Bradford BD1 5RW</p> <p>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.</p>	
AM5	3	1.16	<p>What happens next? 1.16 After the Publication Draft stage the Council will consider the comments received and consider whether any modifications need to be made to the plan before submitting the AAP to the Government. The AAP will then be considered by an independent inspector at a public examination. The Inspector's role is to consider whether the plan can be considered to be sound having regard to a number of factors including the 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.</p>	<p>These paragraphs refer to the previous formal public consultation stage prior to submission and should be deleted as they are no longer relevant.</p>
AM6	12	3.2	<p>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. <u>Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study</u></p>	<p>Factual Update</p>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
AM7	13	3.3	<p>3.3 The majority of current waste arisings within Bradford District come from Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (CDEW) and Local Authority Collected Waste (LACW) which combined equates to just under over three quarters of the total arisings. Table 1 sets out the District's current waste arisings.</p> <p>The projected forecast waste arisings for Bradford District draws on the most reliable and robust data available for each waste stream. The Council are taking forward have adopted a 'Growth' based scenario, which follows a growth rate of 33% estimated GVA for all the waste streams of Commercial, Industrial, CDEW and Hazardous. A separate growth rate has been applied to Local Authority Collected Waste <u>and a zero growth rate applied to Agricultural Waste.</u></p>	Factual Update
AM8	13	3.4	As illustrated in Table 2, the projected waste forecasts calculate an overall growth in waste arisings across the District between 2013 2015 and 2030.	Factual update
AM9	13	3.7	Future monitoring of the evidence base underpinning the DPD policies will inform and adjust the levels of waste arisings to be planned for. More information relating to the methodology used in the forecasting of waste arisings, can be found in accompanying Evidence Base Report. <u>Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study.</u>	Factual update.
AM10	14	3.8	It must be made clear at this point that Bradford Council will only be allocating <u>have only allocated sites for</u> Waste Management Facilities for the treatment of Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I). This strategic approach is based on the following factors:	Factual Update

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<ul style="list-style-type: none"> • LACW and C&I are considered ed priority waste streams • The need to reduce biodegradable waste to landfill and the movement up the hierarchy • Sites will generally be larger in scale and of strategic importance • Other waste streams are capable of being managed 'on-site'. 	
AM11	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.	Factual Update
AM12	16	WM2	A range of appropriate waste management sites have been identified allocated for Local Authority Collected Waste (LACW) and Commercial & Industrial Waste (C&I), providing capacity to meet projected waste forecasts. The forecast figures should be seen as a minimum, allowing flexibility in the event that the recycling target is not met. There is a need for additional capacity for LACW and C&I waste to that already permitted or where permission is currently sought, in order to provide a suitable level of flexibility, contingency and choice. This will ensure waste operators can effectively deliver the Local Authority Collected waste and C&I waste facilities required.	Factual Update
AM13	17	4.3	A comprehensive site assessment ¹ has been undertaken to identify the short list of potential site allocations for waste management set out in Policy W3. A long list of sites comprising of existing employment allocations (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	Factual update

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			1 were then further evaluated using a traffic light system to assess which were most appropriate for waste management facilities.	
AM14	17	4.4	Sites with the largest number of green scores were concluded to have the greatest potential to accommodate MSW LACW or C&I waste management facilities although site size will still determine the use of certain sites for waste management using particular technologies or operations. A comprehensive matrix of site scores and suitability for each waste facility is set out in Site Assessment Criteria Methodology and Assessment Paper.	Terminology Update
AM15	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 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.	Factual update
AM16	18	W3	The following sites are identified as suitable allocations have been allocated 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: <ul style="list-style-type: none"> • 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 	Factual Update

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
			<p>Collection and Recycling Site</p> <ul style="list-style-type: none"> • 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. 	
AM17	20	Site WM1	Advanced Thermal Treatment, Conventional Thermal Treatment <u>Conventional Energy from Waste</u> , Open Air Waste Treatment Types.	Terminology Clarification
AM18	22	Site WM2	Any enclosed recycling activity, Mechanical Biological Treatment, Clean Material Reclamation Facility, Dirty Material Reclamation Facility, and Pyrolysis and Gasification <u>Advanced Thermal Treatment</u> .	Terminology Clarification
AM19	22	Site WM2	Conventional Energy from <u>Conventional Energy from Waste</u> and Open Air Waste Treatment Types	Terminology Clarification
AM20	24	Site WM3	Any enclosed recycling activity, <u>Conventional</u> Energy from Waste Facility. Mechanical Biological Treatment, Clean Material Reclamation Facility, Dirty Material Reclamation Facility, In-Vessel Composting Facility, Anaerobic Digestion Facility, Pyrolysis and Gasification Facility <u>and Advanced Thermal Treatment</u> .	Terminology Clarification
AM21	26	Site WM4	Any enclosed recycling activity, <u>Conventional</u> Energy from Waste Facility. Mechanical Biological Treatment, Clean Material Reclamation Facility, Dirty Material Reclamation Facility, In-Vessel Composting Facility, Anaerobic Digestion Facility, Pyrolysis and Gasification Facility <u>and Advanced Thermal Treatment</u> .	Terminology Clarification

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
AM22	28	Site WM5	Any enclosed recycling activity, Mechanical Biological Treatment, Clean Material Reclamation Facility and Pyrolysis and Gasification . <u>Advanced Thermal Treatment.</u>	Terminology Clarification
AM23	28	Site WM5	Conventional Thermal Treatment <u>Energy From Waste</u> and Open Air Waste Treatment	Terminology Clarification
AM24	30	Site WM6	Any enclosed recycling activity, Mechanical Biological Treatment, Clean Material Reclamation Facility, Dirty Material Reclamation Facility, Conventional Energy from Waste Facility, In-vessel Composting, Anaerobic Digestion Facility, and Pyrolysis and Gasification . <u>Advanced Thermal Treatment.</u>	Terminology Clarification
AM25	37		<p>Through the policies and proposal set out in this DPD, the Council is encouraging the management of waste to move up the waste hierarchy. It should be recognised that some initial rResidual waste (<u>e.g that remaining following recycling</u>) is capable of being managed by advanced treatment technologies. The treatment of waste by such technologies (for example through gasification, EfW or autoclaving rather than landfilling), can result in energy production and a residue from the process (such as. bottom ash or flock) which is in itself capable of being recovered / recycled. This is beneficial to Bradford in raising the level of re-use, recycling and recovery in accordance with the District's Waste Hierarchy.</p> <p>However, there will always likely to be some amount of <u>final</u> residual waste which remains after <u>all</u> treatment types have been utilised, including thermal treatment. The final disposal of <u>this final</u> residual waste in landfill is therefore a necessary requirement of waste management.</p>	Terminology Clarification

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
AM26	37	5.6	<p>However, there will always likely to be some amount of residual waste which remains after treatment types have been utilised, including thermal treatment <u>and the need to dispose of bottom ash that cannot be further reused or recycle for more sustainable purposes.</u> The final disposal of residual waste in landfill is therefore a necessary requirement of waste management.</p>	Terminology Clarification
AM27	37		<p>W7: Sites for <u>Final</u> Residual Waste for Final-Disposal (i.e Landfill)</p> <p>Waste disposal <u>to landfill</u> will continue to play an important, albeit diminishing, role in managing final rResidual waste. While there is a clear imperative to reduce <u>final r</u>Residual without recovery waste arisings, there is also a need to plan for the final disposal of <u>final</u> residual waste following all treatment and recovery. The transition away from the final disposal of waste without treatment is an evolutionary process, requiring time to allow for alternative facilities to be put in place to support Bradford’s waste hierarchy objectives. A monitor and manage approach to <u>final r</u>Residual waste for final disposal (i.e. landfill) sites’ will be adopted to ensure that there is a sufficient supply of landfill waste facilities available within the West Yorkshire Sub-Region in the first instance and thereafter in the Y&H Region to 2030.</p>	Terminology Clarification
AM28	46		<p><u>Final</u> Residual Waste for Final Disposal (i.e. Landfill)</p> <p>While <u>final r</u>Residual waste for final disposal at landfill is the final recourse in Bradford’s waste hierarchy. The Council will utilise the existing regional and sub-regional landfill capacity on a monitor and manage basis.</p>	Terminology Clarification

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	Reason for Modification
AM29	47		WDM5: Landfill Development for Final -Disposal of Final Residual Waste	Terminology Clarification
AM30	47	WDM5	<p>b) e) The impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised in terms of:</p> <ul style="list-style-type: none"> • Environmental, social or economic effects; • Human Health; • Noise, vibrations, dust, odour; • Water, ground, light or air pollution <p>c) 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;</p> <p>d) g) The facility's design and operation maximises opportunities to recover energy and to make efficient use of heat and water resources;</p> <p>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.</p>	Correction of a numbering error.