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**BRADFORD WASTE
MANAGEMENT DPD –
PROPOSED MODIFICATIONS
ADDENDUM TO
SUSTAINABILITY APPRAISAL
REPORT APPENDIX 1:
ASSESSMENT MATRICES**

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MODIFICATIONS
ADDENDUM TO SUSTAINABILITY APPRAISAL REPORT
APPENDIX 1: ASSESSMENT MATRICES**

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1. INTRODUCTION

This document sets out the assessment of the policies and sites contained in the Proposed Modifications to the Bradford Waste Management DPD Submission Draft (2017). Section 2 of the document contains assessment matrices for all the policies contained in the Proposed Modifications to the Bradford Waste Management DPD Submission Draft. These are:

- Vision and Objectives for Waste Management;
- W1: Cross Boundary Working;
- W2: Bradford’s Future Waste Capacity Requirements;
- W3: Proposed Waste Site Allocations. Please note that Policy W3 contains only a list of sites and these have been assessed in Section 3 of this document;
- W4: Sites for Construction, Demolition and Excavation Waste;
- W5: Sites For Agricultural Waste;
- W6: Sites for Hazardous Waste;
- W7: Sites for Residual Waste for Final Disposal (i.e. Landfill);
- WDM1: Unallocated Sites;
- WDM 2: Assessing All Applications for New and Expanded Waste Management Facilities;
- WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility;
- WDM4: Waste Management within Development; and
- WDM5: Landfill Development for Final Disposal of Residual Waste.

Section 3 of the document contains assessment matrices for all the sites contained in the Bradford Waste Management DPD Submission Draft (2016) (as listed in Policy W3). These are:

- Site WM1 – Princeroyd Way, Ingleby Road, Listerhills;
- Site WM2- Ripley Road, Bowling;
- Site WM3- Aire Valley Road, Worth Village Keighley;
- Site WM4- Bowling Back Lane Household Waste Collection and Recycling Site;
- Site WM5 - Merrydale Road, Euroway; and
- Site WM6- Steel Stock and Scrapholders Site, Birkshall Lane.

2. POLICY ASSESSMENT MATRICES

The first row of the appraisal matrices contain a summary of the changes that have been made to each policy through each of the planning stages:

- Between Preferred Approach (2010) and Publication Draft (2013);
- Between Publication Draft (2013) and Submission Draft (2016); and
- Between Submission Draft (2016) and the Proposed Modifications to the Bradford Waste Management DPD Submission Draft (2017).

The purpose of this is to provide a clear audit trail of the development of the policies.

The second row downwards of the appraisal matrices contains an assessment of the policy as it appeared in the Preferred Approach. It then shows how the appraisal conclusions have changed due to the changes made to the policy in the Proposed Modifications. The purpose of this is to show how the sustainability effects of the policies have changed in response to amendments made to each policy. This final column also includes information regarding whether any suggested mitigation or enhancement measures are outstanding. We feel that this is the clearest way to present the evolution of the policies and how this might change the sustainability effects of the plan.

The key to the scoring of the appraisal is shown below:

Score	Description	Symbol
Significant positive impact	The option / plan achieves all of the applicable SEA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	++
Minor positive impact	The option / plan achieves some of the SEA questions and has a positive effect with relation to characteristics of the effect and the sensitivity of the receptors	+
Neutral	The option / plan does not have an effect on the achievement of the SEA Objective or SEA questions	0
Minor negative impact	The option / plan conflicts with some of the SEA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors	-
Significant negative impact	The option / plan conflicts with all of the applicable SEA questions and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors. In addition the future baseline indicates a worsening trend in the absence of intervention	--

Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SEA Objective							?
Vision and Waste Objectives								
<p>Policy changes between Preferred Approach and Publication Draft: The vision considers waste prevention rather than reduction; removes the reference to self-sufficiency (although objective 1 still states that the area should be more self-sufficient) but still discusses taking waste to the nearest facility and also discusses cross boundary working.</p> <p>Policy changes between Publication Draft and Submission Draft: The vision and objective 1 now state an aspiration to achieve net self-sufficiency and objective 4 commits to production of waste derived fuels where it is not possible to re-use or re-cycle the waste.</p> <p>The objectives have removed the reference to managing other area’s waste. Cross boundary working is now discussed in the context of working beyond the sub region. The objectives now support the production of waste derived fuels.</p> <p>Policy changes between Submission Draft and Submission Draft Proposed Modifications: The vision now states an objective to achieve a modal shift in the transportation of waste arisings and states that this will help in climate change mitigation and adaptation. Objectives 3 and 5 have been strengthened to include concept of enhancement of the District’s environmental assets and to include a reference to use of sustainable transport modes.</p>								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	The policy commits to self-sufficiency, waste reduction, protecting the environment and appropriate expansions to new facilities for waste. This should lead to a reduction of the amount of waste that will require treatment.	+	+	+	The policy commits to self-sufficiency and has been strengthened through the consideration of the prevention of waste and through promoting the use of waste derived fuels.
SA2: Minimise the growth in waste and increase the amount of waste which is re-used,	++	++	++	The policy supports delivery of adequate and appropriate waste facilities and attempts to move Bradford District up the waste hierarchy. It also includes an objective to plan for the use of waste as a raw material and energy source.	++	++	++	The policy has been strengthened through the consideration of the prevention of waste and through promoting the use of waste derived fuels.

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recycled and recovered.				The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.				
SA3: Reduce the District’s impact on climate change and vulnerability to its effects.	+	+	+	<p>Measures including self-sufficiency, using waste as an energy source, movement up the waste hierarchy and the proximity principle are embedded in the policy and will support climate mitigation, energy efficiency and to a degree adaptation. However, the policy does not include explicit reference to adaptation to climate change or reducing CO₂ emissions from waste management activities.</p> <p>Enhancement measures Include explicit reference to how measures of self-sufficiency, promotion of waste hierarchy and the proximity principle which are embedded in the policy, also support climate mitigation and to a degree adaptation.</p>	++	++	++	The vision now includes an explicit reference to climate change mitigation and adaptation, explaining how measures including the proximity principle, promotion of a range of technologies, model shift in transportation of waste and crossboundary working will contribute to this.
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	++	++	++	<p>The majority of waste is transported by road to distant landfill sites in Wakefield and Skipton. Measures to increase self-sufficiency should help reduce levels of diffuse air pollution generated from the movement of this waste.</p> <p>Local pollution and nuisance in Bradford associated with transport and movement of waste is most effectively tackled by reducing total amount of waste. Waste reduction is included in the vision and objectives.</p>	++	++	++	The policy has been strengthened through the consideration of the prevention of waste.

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				<p>There is an objective included in the policy which commits to ensuring facilities are developed in a manner which protects the environment, Handling waste close to source should promote the use of previously used land near to urban locations rather than remote Greenfield sites.</p> <p>The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.</p>				
<p>SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.</p>	?	?	?	<p>The fulfilment of the policy objectives should help avoid impacts on designated sites or biodiversity more generally. Responsible waste management, self-sufficiency, and the proximity principle should all be of benefit in reducing future additional impact. The policy does not include explicit reference to biodiversity but this may be too detailed for waste management objectives. The policy does refer to protecting environmental assets. The HRA screening report does not conclude whether there will be likely significant effects on the European Designated Sites and the screening report has not yet been agreed by Natural England.</p> <p>Mitigation measures</p> <p>The HRA screening assessment needs to conclude whether there are likely significant effects on the European Designated Sites and this needs to be agreed with Natural England. Once this</p>	+	+	+	<p>A HRA screening assessment concludes that there are no likely significant effects from this policy.</p> <p>The policy has been strengthened via the inclusion of the concept of enhancement within Objective 3, which supports the improvement of the environment.</p>

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				<p>has been completed the uncertainty with regard to this objective within the SA should have been addressed.</p> <p>The policy could support improvement of the environment by including the concept of enhancement within the following objective "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.</p>				
<p>SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.</p>	+	+	+	<p>The vision and objectives are unlikely to directly deliver restoration or achievement of BAP targets. However, responsible waste management, self-sufficiency, and proximity principle should all be of benefit in reducing future additional impact.</p> <p>The policy does not include explicit reference to biodiversity but this may be too detailed for waste management objectives. The policy does refer to protecting environmental assets.</p> <p>Enhancement measures</p> <p>The policy could support improvement of the environment by including the concept of enhancement within the following objective "To ensure that expansions to existing facilities where appropriate and new waste facility developments support the planned growth and waste needs of the Bradford</p>	+	+	+	<p>No change</p> <p>Outstanding enhancement measure</p> <p>The policy could support improvement of the environment by including the concept of enhancement within the following objective "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>

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				community and are delivered in a manner which protects and enhances the District’s environmental assets and safeguards human health”.				
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	+	+	+	<p>Measures to for responsible waste management, self-sufficiency and locating facilities close to source should help guide develop away from rural sensitive landscapes both inside and outside the district. The policy doesn’t refer to landscape protection but does refer to protecting environmental assets.</p> <p>Enhancement measures</p> <p>The policy could support improvement of the environment by including the concept of enhancement within the following objective “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>No change</p> <p>Outstanding enhancement measure</p> <p>The policy could support improvement of the environment by including the concept of enhancement within the following objective “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>
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage	+	+	+	<p>The policy should help to reduce the distance travelled by waste as it aims to reduce transport of waste and promote the location of facilities near to source. The policy does not address allowing residents to segregate waste, although this is probably too detailed for the vision and objectives.</p>	+	+	+	No Change

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travelled and encouraging waste segregation in new development.								
SA9: Reduce nuisance caused to communities by waste transport.	++	++	++	<p>The policy will be positive with regards to the aim to reduce transport of waste and promotion of the location of facilities near to source.</p> <p>The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.</p>	++	++	++	No Change
SA10: Encourage a modal shift away from road freight.	0	0	0	<p>Modal shift not addressed in the policy. The policy will not work against modal shift but will not encourage it so has been scored as neutral.</p> <p>Enhancement measures</p> <p>Include commitment to modal shift in vision and objectives.</p>	+	+	+	Despite the fact that much of the waste moved is short distance, a commitment to modal shift is now included in vision and objectives, which will aid in climate change mitigation and adaptation.
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	+	+	+	<p>The policy supports protection of the environment and location of facilities near to source which should help bring forward applications for redundant sites close to settlements. This should increase use of previously developed land.</p> <p>The protection of the built environment is not specifically referred to but the policy does discuss protecting environmental assets.</p> <p>Enhancement measures</p>	+	+	+	<p>No change</p> <p>Outstanding enhancement measure</p> <p>The policy could support improvement of the environment by including the concept of enhancement within the following objective "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</p>

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				The policy could support improvement of the environment by including the concept of enhancement within the following objective “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”				safeguards human health”.
SA12: Avoid, protect and enhance historic assets.	+	+	+	The drivers of policy should be positive through trying to reduce the range of impacts associated with waste. Enhancement measures The policy could support improvement of the environment by including the concept of enhancement within the following objective “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.	+	+	+	No change Outstanding enhancement measure The policy could support improvement of the environment by including the concept of enhancement within the following objective “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”.
SA13: Improve the quality and range of services available within communities and connections	++	++	++	The policy seeks to improve the current situation in regards to access to waste facilities whilst planning for the waste needs of the Bradford community. The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all	++	++	++	No change

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to wider networks.				the appraisal questions positively.				
SA14: Ensure local communities take more responsibility for their own waste	++	++	++	The main drivers of policy aim to tackle this issue through increasing self-sufficiency. The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.	++	++	++	No change
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	+	+	+	It is unlikely that public open space, cultural, leisure and recreation land will be required for development as there is a large supply of previously developed land available for waste management facilities. In addition, the policy does refer to protecting environmental assets.	+	+	+	No change
SA16: Reduce the impact of the waste industry on people's safety and security, health and quality of life	+	+	+	The integration of waste facilities within communities whilst safeguarding human health will be reliant on careful implementation. However, the policy does set out that human health should be protected and this is all that a set of objectives can realistically achieve.	+	+	+	No change
SA17: Support employment in the waste industry for local people.	++	++	++	The policy aims to change the way that waste is managed in the district. By focusing on locating for the management of waste as close as possible to place of production, Bradford District should see a corresponding increase in people employed in the waste sector. As the majority of waste is currently transported out of the district there is little opportunity for this at present.	++	++	++	No change

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				Focusing on issues such as using waste for energy and moving away from landfill increases the chances that these jobs will be more skilled than in the past. The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.				
SA18: Ensure the provision of adequate waste management capacity.	++	++	++	The vision and objectives aim to achieve this through the delivery of the plan. The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.	++	++	++	No change

Summary of the changes to the assessment

The policy has been slightly strengthened through the consideration of the prevention of waste and through promoting the use of waste derived fuels and the SA is slightly more positive as a result.

This is a positive visioning type policy that commits the plan to self-sufficiency, waste prevention, the proximity principle, protecting the environment and appropriate expansions to new facilities. Significant positive impacts have been identified in relation to several SA objectives. These include objectives to minimise the growth in waste, increase the amount which is reused, recycled and recovered, the potential to safeguard and improve air, water and soil, reducing the number of people affected by noise and dust, reducing the transport of waste and adverse effects of this on communities, improving accessibility to waste infrastructure, supporting the development of local jobs in this sector and importantly ensuring adequate waste management capacity.

Minor positive impacts are identified related to the reduction of greenhouse gas emissions caused by waste management, avoiding impacts on protected landscapes, historic assets, ensuring that open space, cultural, leisure and recreation opportunities are not affected by waste management and maximising use of previously developed land.

The Vision and Objectives will have no significant negative impacts or minor negative impacts.

Policy W1: Cross Boundary Working								
Policy changes between Preferred Approach and Publication Draft: The policy has been amended to state that Bradford Council will attend and contribute to groups, bodies or meetings to support cross-boundary working. The policy also now refers to sharing information with regards to performance in disposing (as well as reducing, re-using and recycling) of waste.								
Policy changes between Publication Draft and Submission Draft: The policy has been updated to include a commitment to promote modal shift in the movement of waste from road to more sustainable forms of transport.								
Policy changes between Submission Draft and Submission Draft Proposed Modifications: The policy has been updated to include a commitment to working collaboratively to promote modal shift in the movement of waste.								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation/ enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	There is a commitment to using cross boundary working and sharing information to reduce arisings from all waste streams. Communication should also help with identification and collaborative use of the BAT (best available techniques) as well as identifying the most appropriate sites for using or generating renewable energy. Details on the construction of new waste facilities are not covered by the policy but may result from cross boundary consultation on waste planning applications.	+	+	+	No change
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and	+	+	+	Cross boundary working could help support development of facilities to recycle waste and development of local markets for waste derived products. Through trade allowances with other authorities, the council is also more likely to meet its quota under LATS. Options for treatment facilities could potentially be enhanced through	+	+	+	No change

Policy W1: Cross Boundary Working								
recovered.				working with neighbouring authorities. Although the policy has the potential to help achieve the SA objectives, the exact details of the collaboration will not be known until later so the policy cannot be scored as significantly positive.				
SA3: Reduce the District's impact on climate change and vulnerability to its effects.	+	+	+	Reducing impacts on and of climate change is not a stated aim or objective of the policy although cross boundary working should help to ensure waste management is more sustainable through information sharing, research on technologies and ensuring collaboration is undertaken on the policy direction in the sub region. Although the policy has the potential to help achieve the SA objectives, the exact details of the collaboration will not be known until later so the policy cannot be scored as significantly positive.	+	+	+	No change
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	No change

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SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	No change
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	No change
SA8: Increase proximity of waste management infrastructure	+	+	+	There are currently exports and imports of waste from surrounding areas to/from Bradford and this is always likely to remain the case. Collaborative working, as promoted by the policy, should help reduce	+	+	+	No change

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to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.				these waste movements to those that are necessary and represent the best management of waste. The policy will not help achieve the second appraisal question (however, this question is not within the remit of the policy).				
SA9: Reduce nuisance caused to communities by waste transport.	+	+	+	As highlighted above, collaborative working should help reduce waste movements to those that are necessary and represent the best management of waste. This should reduce overall traffic miles. However, the policy cannot be scored as significantly positive because it is not known whether this will reduce traffic miles that affect sensitive areas.	+	+	+	No change
SA10: Encourage a modal shift away from road freight.	?	?	?	Cross boundary working provides a good opportunity to deliver on modal shift. However, this is not stated so the policy has been scored as uncertain. <u>Mitigation measures</u> Include pursuit of modal shift as an aim of cross boundary working as this cannot be achieved in isolation from neighbouring authorities.	+	+	+	The updated policy includes a commitment to promote (where possible) modal shift in the movement of waste; therefore a minor positive impact is identified.
SA11: Improve the quality of the built environment, protect and	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible	0	0	0	No change

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enhance historic assets and make efficient use of land.				for achievement of this SA objective.				
SA12: Avoid, protect and enhance historic assets.	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	No change
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	No change
SA14: Ensure local communities take more responsibility for their own waste	+	+	+	As highlighted above, collaborative working should help reduce waste movements to those that are necessary and represent the best management of waste. However, Bradford's own waste management policy will have the most effect on this objective.	+	+	+	No change
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	0	0	0	The policy will have no effect on this objective. Bradford's own waste management policies (rather than any collaboration with others on sub regional policies, for example) will be responsible for achievement of this SA objective.	0	0	0	No change
SA16: Reduce	?	?	?	By working collaboratively with	?	?	?	No change

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<p>the impact of the waste industry on people’s safety and security, health and quality of life</p>			<p>neighbouring local authorities, sharing information and utilising import/ export possibilities the district council opens up more options for waste management as well as potentially better mitigation methodologies.</p> <p>One potential outcome could be the focusing of waste management facilities in one location providing efficiencies but this could also have a potentially larger effect on certain communities. However, this is an uncertain effect. However, other policies in the plan should help mitigate against this impact.</p> <p>Mitigation measures</p> <p>The policy does not require a specific mitigation measure as other development control policies in the plan should mitigate the effects on communities.</p>				
<p>SA17: Support employment in the waste industry for local people.</p>	<p>+</p>	<p>+</p>	<p>This policy may increase the number of waste sites within the district and/or potentially within neighbouring areas. It is assumed that there would be at least a minor increase in the number of jobs in the sector in the district, unless the policy runs contrary to the main principles of self sufficiency that are in the plan. The policy has not been assessed as significantly positive because the extent and skill level of new jobs generated cannot be predicted.</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>No change</p>
<p>SA18: Ensure the provision of adequate waste management</p>	<p>++</p>	<p>++</p>	<p>By working collaboratively with neighbouring local authorities, sharing information and utilising import/ export possibilities the district council opens up more options for waste management and</p>	<p>++</p>	<p>++</p>	<p>++</p>	<p>No change</p>

capacity.				delivering on required capacity.			
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Summary of the changes to the assessment

The policy has been updated to include a commitment to promote (where possible) modal shift in the movement of waste from road to more sustainable forms of transport; therefore a minor positive impact is identified in relation to SA10.

Significant positive effects have been identified in relation to the provision of adequate waste management capacity. Minor positive impacts were identified in relation to ensuring the prudent and efficient use of energy and natural resources, minimising the growth in waste and increasing the amount of waste which is re-used, recycled and recovered, reducing the District’s impact on climate change, achieving the proximity principle, reducing nuisance caused to communities by waste transport, ensuring local communities take more responsibility for their own waste and supporting employment in the waste industry for local people.

No negative effects were identified but neutral impacts were noted in relation to safeguarding air, water and soil resources, biodiversity, landscape, efficient use of land, historic assets, improving the quality and range of services available within communities and open space and recreation opportunities. For these impacts it was considered that the effects are tested as part of the site assessments. Therefore, the scoring here has been listed as neutral.

Policy W2: Bradford’s Future Waste Capacity Requirements

Policy changes between Preferred Approach and Publication Draft: Due to more recent data becoming available there have been slight changes in the amount of waste that needs to be accommodated within the District (a slight overall increase of 72,000 tonnes to 2026). The increase is due to an increase in commercial and industrial waste that needs to be accommodated. All other waste streams have stayed the same or decreased. The policy also refers to forecast figures being seen as a minimum.

The policy also acknowledges that the most appropriate and sustainable solution may result in relying on treatment capacity in other local authority areas.

Policy changes between Publication Draft and Submission Draft: Due to more recent data becoming available there have been slight changes to the capacity requirements for different waste streams within the District, as well as a change to the timescale by which these are required (i.e. updated from 2026 to 2030). Capacity requirements for agricultural waste have also been added.

Policy changes between Submission draft and Submission Draft Proposed Modifications: no change

SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	<p>The policy demonstrates the difficult balance that needs to be struck between the requirement to predict and provide for waste management facilities and the desire in the strategy for demand management to reduce total future waste arisings. The strategy seeks to reduce the total amount of waste requiring treatment but this requires reversing the current trend. Forecasts are for an overall reduction in waste arising of 81,590 across the district between 2008 and 2026, a 5% improvement (See table 4, p17 of the Waste DPD).</p> <p>Much greater gains are expected through re-use and recycling, both which should reduce the degree of residual treatment required.</p> <p>Re-use of construction and demolition</p>	+	+	+	No change

Policy W2: Bradford’s Future Waste Capacity Requirements								
				<p>waste (in-situ) is strongly promoted in this policy and one can assume this will be applied in the construction of new waste management.</p> <p>The policy has not been scored as significantly positive as it will not positively answer all the appraisal questions.</p>				
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	++	++	++	<p>The policy supports the development of Bradford’s own waste management facilities, moving away from the unsustainable current situation of a net exporter. The focus on providing adequate facilities should help the district meet its recovery and recycling targets and meet its quota under the LATS and well as encouraging use and markets for products.</p> <p>The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.</p>	++	++	++	No change. The policy has recognised that the Council may have to rely on treatment capacity in other adjacent areas. However, it is not felt that this weakens the policy as Bradford is moving significantly towards managing more of its own waste in the future.
SA3: Reduce the District’s impact on climate change and vulnerability to its effects.	+	+	+	<p>Transport of CDEW and Agricultural Waste is first to be avoided through promotion of treatment in situ. This should be significantly positive as this is the largest waste stream in the District. Re-use or recycling should have a positive impact on climate emissions and provides a number of efficiencies including reduction in use of new resources, reduction in production and transport costs.</p> <p>Forecasts in reductions of total waste</p>	+	+	+	No change. Total waste is still forecast to decline.

Policy W2: Bradford’s Future Waste Capacity Requirements								
				<p>(although minor) should support carbon reduction commitments.</p> <p>The policy also encourages energy production from waste (which can be considered a renewable form of energy).</p> <p>The policy has not been scored as significantly positive as it will not help the district adapt to climate change. However, this policy is perhaps not the correct location for action of this type.</p>				
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	+	+	+	<p>The push for self-sufficiency and locating facilities close to source should reduce pollution associated with lengthy HGV journeys.</p> <p>Levels of development on previously developed land have been tested as part of the site assessments and the conclusions for each individual site can be seen at the end of this document.</p>	+	+	+	No change. The policy has recognised that the Council may have to rely on treatment capacity in other adjacent areas. However, it is not felt that this weakens the policy as Bradford is moving significantly towards managing more of its own waste in the future.
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	0/?	0/?	0/?	As additional waste management facilities are built in the District to meet commitments to self sufficiency there is the potential that these actions will lead to direct or indirect adverse effects on designated sites. The effects on the SA criterion of future waste management sites have been tested as part of the site assessments and the conclusions to these site assessments can be seen at the end of this appendix. Because the effects of the sites are addressed elsewhere the	0	0	0	The HRA screening assessment concludes that there are no likely significant effects from this policy.

Policy W2: Bradford’s Future Waste Capacity Requirements								
				<p>scoring here has been listed as neutral.</p> <p>There is an uncertainty related to the effects of the sites on Natura 2000 sites. At the issues and options stage of the assessment certain sites were highlighted as having a potential impact on Natura 2000 sites. None of these sites have been chosen as preferred sites. However, the HRA screening report does not conclude whether there will be likely significant effects on the European Designated Sites and the screening report has not yet been agreed by Natural England.</p> <p><u>Mitigation measures</u></p> <p>The HRA screening assessment needs to conclude whether there are likely significant effects on the European Designated Sites and this needs to be agreed with Natural England. Once this has been completed the uncertainty with regard to this objective within the SA should have been addressed.</p>				
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	0	0	0	As additional waste management facilities are built in the District, there is the potential for sites to help reach BAP targets and ensure biodiversity is a priority in site restoration. However, this is best addressed in other policies in the document so this has been scored as neutral for this policy.	0	0	0	No change
SA7: To	0	0	0	As additional waste management facilities	0	0	0	No change

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Policy W2: Bradford's Future Waste Capacity Requirements								
maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.				are built in the District to meet commitments to self-sufficiency there is the potential that these actions will lead to effects on landscape. The effects on the SA criterion of future waste management sites have been tested as part of the site assessments. Therefore, the scoring here has been listed as neutral.				
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.	+	+	+	The promotion of policies to support the development of waste management facilities in Bradford should significantly reduce the burden Bradford places on other areas and net export total of 270,260 tonnes. This will reduce mileage travelled by waste. The policy will not help encourage residents to segregate waste. However, this is best addressed in other policies in the document.	+	+	+	No change. The policy has recognised that the Council may have to rely on treatment capacity in other adjacent areas. However, it is not felt that this weakens the policy as Bradford is moving significantly towards managing more of its own waste in the future.
SA9: Reduce nuisance caused to communities by waste transport.	+	+	+	In situ waste reuse and recovery, rather than transport to landfill, should help reduce traffic flows. Effects on local changes to traffic flows from new and expanded waste facilities has been assessed through the site assessments.	+	+	+	No change. The policy has recognised that the Council may have to rely on treatment capacity in other adjacent areas. However, it is not felt that this weakens the policy as Bradford is moving significantly towards managing more of its own waste in the future.
SA10:	0	0	0	As additional waste management facilities	0	0	0	No change

Policy W2: Bradford’s Future Waste Capacity Requirements								
Encourage a modal shift away from road freight.				are built in the District, there is the potential to encourage alternative transport modes. However, this is best addressed in other policies in the document so this has been scored as neutral for this policy.				
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	0	0	0	As additional waste management facilities are built in the District to meet commitments to self sufficiency there is the potential that these actions will impact upon the built environment. New sites can also help to increase the amount of previously developed land that is used for waste management. However, the effects on the SA criterion of future waste management sites have been tested as part of the site assessments and the conclusions to these site assessments can be seen at the end of this appendix. Because the effects of the sites are addressed elsewhere the scoring here has been listed as neutral.	0	0	0	No change
SA12: Avoid, protect and enhance historic assets.	0	0	0	As additional waste management facilities are built in the District to meet commitments to self-sufficiency there is the potential that these actions will impact upon heritage. The effects on the SA criterion of future waste management sites have been tested as part of the site assessments and the conclusions to these site assessments can be seen at the end of this appendix. Because the effects of the sites are addressed elsewhere the scoring here has been listed as neutral.	0	0	0	No change

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Policy W2: Bradford's Future Waste Capacity Requirements								
SA13: Improve the quality and range of services available within communities and connections to wider networks.	++	++	++	Appropriate waste management facilities within the District will be sought for MSW. This together with the site location criteria should result in improved accessibility.	++	++	++	No change
SA14: Ensure local communities take more responsibility for their own waste	++	++	++	The policy aims to ensure that adequate treatment facilities are available to ensure Bradford takes responsibility for its own waste.	++	++	++	No change. The policy has recognised that the Council may have to rely on treatment capacity in other adjacent areas. However, it is not felt that this weakens the policy as Bradford is moving significantly towards managing more of its own waste in the future.
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	0	0	0	As additional waste management facilities are built in the District to meet commitments to self sufficiency there is the potential that these actions will impact upon open space and recreation areas. The effects on the SA criterion of future waste management sites have been tested as part of the site assessments and the conclusions to these site assessments can be seen at the end of this appendix. Because the effects of the sites are addressed elsewhere the scoring here has been listed as neutral.	0	0	0	No change
SA16: Reduce the impact of the waste industry on	0	0	0	There is the potential to increase the impact on people affected by waste management facilities due to requirement to provide new facilities close to source.	0	0	0	No change

Policy W2: Bradford’s Future Waste Capacity Requirements								
people’s safety and security, health and quality of life				The outcome on both depends on site planning through criteria based site location and implementation of development management policies. This has been tested through the assessment of development management policies so has been scored as neutral here.				
SA17: Support employment in the waste industry for local people.	++	++	++	Accommodating for waste and providing a variety of appropriate waste management facilities higher up the waste hierarchy should positively contribute to this objective.	++	++	++	No change
SA18: Ensure the provision of adequate waste management capacity.	++	++	++	This policy should achieve the SA objectives in full so has been scored as significantly positive.	++	++	++	No change
<p>Summary of the changes to the assessment</p> <p>There have been no significant changes to the policy and no changes to the results of the SA. The amounts that need to be planned for have slightly changed due to more up to date data being available. The policy also now recognises that the Council may have to reply on treatment capacity in other adjacent areas. However, it is not felt that this weakens the policy as Bradford is moving significantly towards managing more of its own waste in the future.</p> <p>The policy supports the vision and objectives in relation to self-sufficiency, proximity principle and moving up the waste hierarchy. As a result the policy has many associated benefits in respect to economic, social and environmental objectives. In particular, potential economic gains should be particularly positive.</p> <p>Significant positive impacts are identified for minimising the growth in waste and increasing the amount of waste which is re-used, recycled and recovered, improving the accessibility of waste management and treatment services, reducing the amount of waste that is treated outside of the District, ensuring the provision of adequate waste management capacity as well as supporting employment in the waste industry for local people. Minor positive impacts are noted in relation to the potential to mitigate against climate change, reducing the amount of pollution and nuisance caused by waste management and transport and increasing proximity of waste management infrastructure to current and future centres of population.</p> <p>Neutral impacts were identified against objectives to conserve, enhance designated sites, species and habitats, maintain and restore landscapes, improve the quality of the built environment, protect and enhance historic assets and make efficient use of land, avoid impacts on open space and recreation opportunities and reducing the impact of the waste industry on people’s quality of life. It is considered that the impacts on these be tested as part of the site assessment criteria and development control policies. Encouraging a modal shift away from road freight was also considered as neutral. This is best addressed in other policies in the document so this has</p>								

Policy W2: Bradford’s Future Waste Capacity Requirements

been scored as neutral for this policy.

No negative effects have been identified for this policy.

Policy W3: Proposed Site Waste Allocations

Please note that Policy W3 Proposed Waste Site Allocations was changed significantly between Preferred Approach and Publication Draft. The original policy outlined in detail the criteria used to select and assess sites. However, the updated policy simply listed the sites that were allocated. Since the effects of these sites are assessed separately (in the site assessment tables at the end of this document) it is no longer necessary to assess Policy W3. Between Publication Draft and Submission Draft, Sites 35 and 48 were removed from Policy W3 and between Submission Draft and Submission Draft Proposed Modifications the site allocation wording was amended; the site assessment tables now address the amended policy and site allocations.

Policy W4: Sites for Construction, Demolition and Excavation Waste								
Policy changes between Preferred Approach and Publication Draft: The policy has been amended to recognise that CDEW development should not sterilise the extraction of important gas or mineral resources.								
Policy changes between Publication Draft and Submission Draft: The policy has been amended to include consideration of proposed employment and industrial sites, alongside established sites, for CDEW facilities. It also now excludes the reference to avoiding the sterilisation of extraction sites for gas or mineral resources, while including these under the definition of previously developed land.								
Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change.								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	There is a potential conflict here with the objective to reduce the generation of CDEW however, the policy recognises this and includes caveats that test whether the CDEW waste cannot be reduced or processed at source. Providing appropriate facilities will allow for CDEW to be recycled and recovered rather than being landfilled. Ensuring that new facilities are sustainable in terms of their water use and resource use is not addressed in the policy. However, these issues are addressed as part of Policy WDM2 through requirements	+	+	+	No change

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Policy W4: Sites for Construction, Demolition and Excavation Waste								
				to meet BREEAM excellent.				
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	++	++	++	Provision of new and expanded CDEW sites (where there is an identified need) will allow the Council to meet all of these objectives in terms of recycling and re-use.	++	++	++	No change
SA3: Reduce the District's impact on climate change and vulnerability to its effects.	+	+	+	The policy requires a test for identified need demonstrating that the CDEW waste cannot be reduced or processed on site at source. This first step should reduce the amount of waste that needs to be transported and managed and the climate emissions related to this. Climate change adaptation and flood risk are not included as site criteria within Appendix 1 and although Policy WDM2 refers to minimising effects on flood plains, future proofing the new facilities against impacts of climate change needs to be explicitly dealt with when assessing site proposals. This is dealt with in the assessment of Policy WDM2. Policy WDM2 also addresses BREEAM requirements (which address renewable energy).	+	+	+	No change
SA4: Safeguard and improve air, water and soil resources and reduce the	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site	+	+	+	No change

Policy W4: Sites for Construction, Demolition and Excavation Waste								
number of people affected by noise and dust from waste management sites.				selection criteria and Waste Management Development policies should minimise any residual adverse effects.				
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	?	?	?	<p>Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects.</p> <p>There is an uncertainty related to the effects of the sites on Natura 2000 sites. At the issues and options stage of the assessment certain sites were highlighted as having a potential impact on Natura 2000 sites. None of these sites have been chosen as preferred sites. However, the HRA screening report does not conclude whether there will be likely significant effects on the European Designated Sites and the screening report has not yet been agreed by Natural England.</p> <p>Mitigation measures</p> <p>The HRA screening assessment needs to conclude whether there are likely significant effects on the European Designated Sites and this needs to be agreed with Natural England. Once this has been completed the uncertainty with regard to this objective within the SA</p>	0	0	0	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.

Policy W4: Sites for Construction, Demolition and Excavation Waste								
				should have been addressed.				
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	0	0	0	As additional waste management facilities are built in the District, there is the potential for sites to help reach BAP targets and ensure biodiversity is a priority in site restoration. However, this is best addressed in other policies in the document so this has been scored as neutral for this policy.	0	0		No change
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects.	+	+	+	No change
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid waste transport and would reduce mileage travelled per tonne of waste. In addition site selection criteria require consideration of site proximity and accessibility. The policy will not help encourage residents to segregate waste. However, this is best addressed in other policies in the document.	+	+	+	No change

Policy W4: Sites for Construction, Demolition and Excavation Waste								
new development.								
SA9: Reduce nuisance caused to communities by waste transport.	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid waste transport. Effects on local changes to traffic flows from new and expanded waste facilities will be assessed through the site assessments.	+	+	+	No change
SA10: Encourage a modal shift away from road freight.	0	0	0	As additional waste management facilities are built in the District, there is the potential to encourage alternative transport modes. However, this is best addressed in other policies in the document so this has been scored as neutral for this policy.	0	0	0	No change
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects and will also address development on previously developed land.	+	+	+	No change
SA12: Avoid, protect and enhance historic assets.	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects.	+	+	+	No change

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Policy W4: Sites for Construction, Demolition and Excavation Waste								
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	This is not relevant to the assessment of this policy as the policy deals with the management of construction waste.	0	0	0	No change
SA14: Ensure local communities take more responsibility for their own waste	++	++	++	This enables the waste generated from small construction sites (where onsite use or recovery not possible) to be managed within the District as a supposed to the current situation which see the majority of CDEW waste tipped in landfills in Neighbouring authorities. The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the appraisal questions positively.	++	++	++	No change
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects.	+	+	+	No change
SA16: Reduce the impact of the waste industry on people's safety	+	+	+	Reducing the amount of waste generated and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. In addition site	+	+	+	No change

Policy W4: Sites for Construction, Demolition and Excavation Waste								
and security, health and quality of life				selection criteria and Waste Management Development policies should minimise any residual adverse effects.				
SA17: Support employment in the waste industry for local people.	+	+	+	Identification and delivery of waste management facilities within Bradford to deal with waste rather than exporting the majority should provide more jobs in the District in this sector. The skill level of the jobs will depend on how successful the strategy and other measures are in developing uses, markets and delivering technologically innovative sources.	+	+	+	No change
SA18: Ensure the provision of adequate waste management capacity.	++	++	++	This policy should achieve the SA objectives in full and therefore, has been scored as significantly positive.	++	++	++	No change
<p>Summary of the changes to the assessment</p> <p>The policy has been amended to recognise that CDEW development should not sterilise the extraction of important gas or mineral resources. However, this has not changed the results of the SA.</p> <p>This is a positive policy which helps deliver on the District Council’s commitment to self-sufficiency in managing its own waste. The requirement that the application demonstrate that CDEW cannot be reduced or processed at source should ensure a balance with the Council’s commitment of moving up the waste hierarchy.</p> <p>Significant positive impacts are identified in relation to ensuring the provision of adequate waste management capacity, allowing the Council to meet all of their objectives in terms of recycling and re-use, and reducing the amount of waste that is treated outside of the District.</p> <p>Neutral impacts are identified for the potential for sites to help reach BAP targets, effects on designated biodiversity sites and ensure biodiversity is a priority in site restoration as well as encourage a shift from road freight to rail freight. It is considered that this is best addressed in other policies in the document so this has been scored as neutral for this policy. Neutral impacts are also recorded for improving the quality and range of services available within communities as this policy deals with the management of construction waste.</p> <p>No negative impacts have been recorded. The rest of the SA objectives have been scored as minor positive.</p>								

Policy W5: Sites For Agricultural Waste								
Policy changes between Preferred Approach and Publication Draft: The policy has removed a layer of priority as it now does not refer to using existing industrial or employment land. The policy has been amended to recognise that agricultural waste management sites should not sterilise the extraction of important gas or mineral resources.								
Policy changes between Publication Draft and Submission Draft: No change								
Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	The presumption for treatment at source and then the criterion based approach for the locating and development of new facilities should avoid harm to the environment. Ensuring that new facilities are sustainable in terms of their water use and resource use is not addressed in the policy. However, these issues are addressed as part of Policy WDM2 through requiring facilities to be built which meet BREEAM excellent.	+	+	+	No change
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	+	+	+	The policy aims to ensure that adequate treatment facilities are in place, preferably on site where waste can be processed recovered or recycled. Provision of new and expanded sites (where there is an identified need) will allow the Council to meet all of these objectives in terms of recycling and re-use.	+	+	+	No change
SA3: Reduce	+	+	+	Dealing with waste at source, a priority of	+	+	+	No change

Policy W5: Sites For Agricultural Waste								
the District’s impact on climate change and vulnerability to its effects.				<p>this policy, should significantly reduce any future increase in emissions related to transport of agricultural waste.</p> <p>The policy does not promote the possible use of agriculture waste for promoting renewable energy.</p> <p>Enhancement measure: If possible, the policy should address the use of agricultural waste as a fuel for renewable energy.</p>				<p><u>Outstanding enhancement measure</u> If possible, the policy should address the use of agricultural waste as a fuel for renewable energy.</p>
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	++	++	++	<p>The presumption for treatment at source and then the criterion based approach for the location and development of new facilities should avoid harm to the environment (including on pollution). Agricultural waste and exemptions including moving waste, rules and regulations relating to manures and slurries is tightly controlled by Defra.</p> <p>The treatment of waste on site (which is promoted through this policy) should help improve agricultural land quality.</p>	++	++	++	No change
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	+	+	+	<p>The presumption for treatment at source and then the criterion based approach for the locating and development of new facilities should help avoid adversely affecting designation sites or valued biodiversity features. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects.</p>	+	+	+	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.

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Policy W5: Sites For Agricultural Waste								
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	0	0	0	The policy encourages treatment at source on farms. This is unlikely to prompt biodiversity enhancement measures or negatively affect them. There are a raft of existing measures and controls for improving the ecological impact of farming.	0	0	0	No change
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	+	+	+	<p>The presumption for treatment at source and then the criterion based approach for the locating and development of new facilities should avoid adversely affecting sensitive areas or creating negative visual impacts.</p> <p>Uncontrolled burning or tipping of waste on farms became illegal in 2006 so many potentially unsightly and illegal waste stores have been removed in the last few years. Site restoration of existing or derelict waste facilities is covered under the waste development management policies, particularly WDM3.</p>	+	+	+	No change
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage	+	+	+	<p>The policy requires that the need for additional facilities is demonstrated which should minimise the additional transport of agricultural waste. In addition site selection criteria require consideration of site proximity and accessibility.</p> <p>The policy will not help encourage residents to segregate waste. However, this is best addressed in other policies in the document.</p>	+	+	+	No change

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Policy W5: Sites For Agricultural Waste								
travelled and encouraging waste segregation in new development.								
SA9: Reduce nuisance caused to communities by waste transport.	0	0	0	The presumption for treatment at source and then the criterion based approach for the locating and development of new facilities should avoid increase any nuisance related to this type of waste. However, this is unlikely to affect congested areas and in addition, agricultural waste arisings only likely to comprise 2.4% of total in 2026. Therefore, the policy has been scored as neutral.	+	+	+	No change
SA10: Encourage a modal shift away from road freight.	0	0	0	Unlikely to be cost efficient or possible to encourage modal shift due to rural source of waste. Agricultural waste arisings only likely to comprise 2.4% of total in 2026. Therefore, the policy has been scored as neutral.	0	0	0	No change
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	+	+	+	The policy requires that the need for additional facilities is demonstrated which should minimise effects on the built environment. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects and will also address development on previously developed land.	+	+	+	No change
SA12: Avoid,	+	+	+	Reducing the amount of waste generated	+	+	+	No change

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Policy W5: Sites For Agricultural Waste								
protect and enhance historic assets.				and on-site use and recovery would avoid the potential negative effects of developing new or expended waste management sites. The policy requires that the need for additional facilities is demonstrated which should minimise effects on heritage. In addition site selection criteria and Waste Management Development policies should minimise any residual adverse effects.				
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	As this policy is specific to agricultural waste it is not applicable to this SA objective.	0	0	0	No change
SA14: Ensure local communities take more responsibility for their own waste	++	++	++	This policy should allow for the development of the necessary capacity in order to avoid the waste being transported long distances outside of the district for disposal.	++	++	++	No change
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	+	+	+	The policy requires that the need for additional facilities is demonstrated which should minimise effects of open space and recreation facilities. In addition Waste Management Development policies should minimise any residual adverse effects.	+	+	+	No change
SA16: Reduce	+	+	+	The policy requires that the need for	+	+	+	No change

Policy W5: Sites For Agricultural Waste							
the impact of the waste industry on people's safety and security, health and quality of life				additional facilities is demonstrated which should minimise additional nuisance to communities. In addition Waste Management Development policies should minimise any residual adverse effects.			
SA17: Support employment in the waste industry for local people.	+	+	+	The policy should support the creation of jobs in the sector if new or expanded waste management facilities are needed. It is not possible to predict how skilled these jobs are likely to be.	+	+	+
SA18: Ensure the provision of adequate waste management capacity.	++	++	++	This policy should allow for the development of the necessary capacity when necessary in order to avoid the waste being transported long distances outside of the district for disposal.	++	++	++
Summary of the changes to the assessment							
<p>The policy has removed a layer of priority as it now does not refer to using existing industrial or employment land. The policy has been amended to recognise that agricultural waste management sites should not sterilise the extraction of important gas or mineral resources. However, this has not changed the results of the SA.</p> <p>The policy has significant positive impacts in terms of safeguarding and improving air, water and soil resources, allowing for the development of the necessary waste management capacity, and reducing the amount of waste that is treated outside of the district.</p> <p>Minor positive impacts are identified in relation to ensuring the prudent and efficient use of energy and natural resources, increasing the amount of waste which is re-used, recycled and recovered, reducing emissions related to transport of agricultural waste, and minimising adverse effects on biodiversity, landscape, historic assets, open space, people and the built environment. It should also support creation of local jobs in this sector. The Waste Development Management policies should avoid potential adverse effects upon people and the environment through the location and siting of new agricultural waste facilities.</p> <p>Neutral scores have been identified for a number of objectives not directly related to the management of agricultural waste including improving the quality and range of services available within communities, encouraging a modal shift away from road freight, and reducing the nuisance caused to communities by waste transport.</p> <p>Enhancement measures outstanding</p> <p>If possible, the policy should address the use of agricultural waste as a fuel for renewable energy.</p>							

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Policy W6: Sites for Hazardous Waste								
Policy changes between Preferred Approach and Publication Draft: The policy has been amended to recognise that hazardous waste development should not sterilise the extraction of important gas or mineral resources.								
Policy changes between Publication Draft and Submission Draft: No changes								
Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	A target has been outlined that seeks to ensure that the production of hazardous waste does not increase. This should ensure that there is not an increase in the amount of waste that needs to be treated.	+	+	+	No change
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	+	+	+	There is zero growth in hazardous waste expected. However, in the longer term a site may be needed in the sub region to deal with this type of waste. The policy puts the council in a good position to deal with an application for hazardous waste in a sustainable way. The policy will positively answer some of the appraisal question so has been scored as slight positive.	+	+	+	No change
SA3: Reduce the District's impact on climate change and	0	0	?	The policy maintains the status quo (especially in the short term). The quantity treated and distances transported are likely to stay the same in the short to medium term. In the long term if	0	0	?	No change

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Policy W6: Sites for Hazardous Waste								
vulnerability to its effects.				additional sites are needed then the distance transported could rise or fall. However, this should be controlled through Policy WDM2.				
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	0	0	0	Level of pollution and nuisance associated with Hazardous waste should stay the same. The criteria should successfully guide any new applications for development to PDL and away from valuable land or sensitive areas.	0	0	0	No change
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	0	0	0	If there is zero growth in this sector as expected and the area of search extends to neighbouring authorities then the need for new facilities in sensitive areas is unlikely.	0	0	0	A HRA screening assessment has been undertaken and concludes that there are no likely significant effects from this policy.
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national	0	0	0	The policy maintains status quo and will be little impact on this SA objective. Policy MWD2 should avoid adversely affecting protected species and habitats if new facilities are needed in the longer term.	0	0	0	No change

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Policy W6: Sites for Hazardous Waste								
BAP targets.								
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	0	0	0	The policy maintains status quo and will be little impact on this SA objective. The criteria for protecting the environment when new facilities are considered should protect the landscape.	0	0	0	No change
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.	0	0	0	Not relevant to domestic municipal waste. The maintenance of the status quo will not change mileage travelled per tonne of waste.	0	0	0	No change
SA9: Reduce nuisance caused to communities by waste transport.	0	0	0	The maintenance of the status quo will not cause a change to traffic flows.	0	0	0	No change
SA10:	0	0	0	The maintenance of the status quo will not	0	0	0	No change

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Policy W6: Sites for Hazardous Waste								
Encourage a modal shift away from road freight.				cause a change to transport of waste by alternative means.				
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	+	+	+	There is zero growth in this sector as expected and the area of search extends to neighbouring authorities then unlikely that there will be adverse impacts on the built environment. The use of PDL if new facilities are needed is high up the list of required criteria.	+	+	+	No change
SA12: Avoid, protect and enhance historic assets.	0	0	0	There is a strict set of criteria that must be met for new and expanded hazardous waste management sites. If there is zero growth in this sector as expected and the area of search extends to neighbouring authorities then the need for need facilities in sensitive areas is unlikely.	0	0	0	No change
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	Not relevant for hazardous waste	0	0	0	No change
SA14: Ensure local communities take more	0	0	0	Hazardous waste is currently treated outside the district and in the future if new facilities are needed these are likely to be sub regional facilities. This may mean	0	0	0	No change

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Policy W6: Sites for Hazardous Waste								
responsibility for their own waste				that hazardous waste will always be treated outside of the district. However, this is likely to be the most sustainable approach for such specialist waste treatment. Therefore, the policy has been scored as neutral.				
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	0	0	0	There is a strict set of criteria that must be met for new and expanded hazardous waste management sites. If there is zero growth in this sector as expected and the area of search extends to neighbouring authorities then it is unlikely that this policy will result in adverse effects on recreation opportunities in Bradford	0	0	0	No change
SA16: Reduce the impact of the waste industry on people's safety and security, health and quality of life	+	+	+	There is a strict set of criteria that must be met for new and expanded hazardous waste management sites. If there is zero growth in this sector as expected and the area of search extends to neighbouring authorities then it is unlikely that this policy will result in an increase in communities affected.	+	+	+	No change
SA17: Support employment in the waste industry for local people.	?	?	?	Hazardous waste is currently treated outside the district and in the future if new facilities are needed these are likely to be sub regional facilities. This may mean that hazardous waste may always be treated outside of the district. This makes the potential for job creation difficult to predict. However, this is difficult to mitigate unless the council takes the opinion that Bradford will be the location in the sub region that specifically manages	?	?	?	No change

Policy W6: Sites for Hazardous Waste								
				hazardous waste (which will cause other impacts).				
SA18: Ensure the provision of adequate waste management capacity.	++	++	++	The policy allows for consideration of, and delivery of new facilities if needed in the longer term. This will ensure that the hazardous waste needs of businesses in the district will be met.	++	++	++	No change
<p>Summary of the changes to the assessment</p> <p>The policy has been amended to recognise that hazardous waste development should not sterilise the extraction of important gas or mineral resources. However, this has not changed the results of the SA.</p> <p>The policy essentially maintains the status quo but acknowledges that there may be a need to identify additional sites in the future and provides criteria to guide the decisions on these. Policy W6 will have no significant or slight negative impacts.</p> <p>Significant positive impacts have been identified in relation to ensuring the provision of adequate waste management capacity. The policy allows for consideration of, and delivery of new facilities if needed in the longer term. Minor positive impacts are identified in relation to making efficient use of land, in relation to the objective to increase the amount of waste which is re-used, recycled and recovered and specifically with regard to the question regarding provision of sustainable treatment facilities as the policy puts the council in a good position to deal with an application for hazardous waste in a sustainable way.</p> <p>The situation is uncertain regarding local skilled job creation. Hazardous waste is currently treated outside the district and in the future if new facilities are needed these are likely to be sub regional facilities. This may mean that hazardous waste will always be treated outside of the district. This makes the potential for job creation difficult to predict. However, this is difficult to mitigate unless the council takes the opinion that Bradford will be the location in the sub region that specifically manages hazardous waste (which will cause other impacts).</p> <p>Neutral impacts are identified for the remaining SA objectives. As the policy maintains the status quo, there will be little impact on SA objectives related to these topics. The criteria for protecting the environment when new facilities are considered should protect these assets.</p>								

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)

Policy changes between Preferred Approach and Publication Draft: The policy has extended the consideration of the supply of residual landfill sites to those in the West Yorkshire sub region and also discusses the use of alternative sub regional capacity where it provides an environmentally preferable solution (technologies such as gasification, autoclaving etc). The site location criteria have also been amended. The first locational criterion has been amended to include the expansion of existing residual waste facilities outside of the District (where this is environmentally preferable). The criteria have also been amended to recognise that residual waste development should not sterilise the extraction of important gas or mineral resources. Proposals for landfill sites will only be accepted permitted they meet a number of criteria and these have been slightly amended. Extension to existing landfill sites will not now be acceptable for operational reasons.

Policy changes between Publication Draft and Submission Draft: The policy has been updated to refer to the requirement for disposal of residual waste only after treatment and recovery. The timescale for establishing sufficient landfill facilities has also been extended to 2030 (from 2026).

Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change

SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	0	0	+	The policy places an emphasis on the continued need to reduce residual waste which may be achieved in the long term in part through the implementation of this strategy. Recycling of MSW and C&I waste appears to be the main method of reducing the residual waste.	0	0	+	No change
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	0	-	-	The policy provides for the identification of new or expanded capacity through a manage and monitor approach. However, the policy appears to focus mainly on landfill sites as opposed to other technologies to deal with residual waste. <u>Mitigation measures</u> The second paragraph should be altered so that it's applicable to all modes of residual waste management. These are	0	++	++	The policy has now been amended to reflect the fact that there are other treatments available for residual waste. The policy has been scored as significantly positive as it will help to achieve the SA objective and answers all the applicable appraisal questions positively.

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
				mentioned earlier in the supporting text and include gasification, EfW or autoclaving.				
SA3: Reduce the District's impact on climate change and vulnerability to its effects.	0	-	-	<p>The policy supports residual waste reduction and does state that proposals for landfill will only be permitted where the residual waste cannot be handled in a more sustainable manner. This should reduce the potential for emissions of greenhouse gas by helping to move waste up the waste hierarchy.</p> <p>However, the policy appears to focus mainly on landfill sites as opposed to other alternative technologies to deal with residual waste.</p> <p><u>Mitigation measures</u></p> <p>The second paragraph should be altered so that it's applicable to all modes of residual waste management. These are mentioned earlier in the supporting text and include gasification, EfW or autoclaving.</p>	0	+	+	The policy has now been amended to reflect the fact that there are other treatments available for residual waste. The policy will positively answer some of the appraisal question so has been scored as slight positive.
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	0	0	+	The policy seeks to achieve these objectives by first reducing residual waste and then employing strict criteria to ensure adversely environmental and social effects are minimised.	0	0	+	No change

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	0/?	0/?	0/?	<p>Detailed testing criteria should ensure adverse effects on sensitive sites are minimised. In addition, the criteria for new or extended landfill waste development requires that the development leads to an improvement in the quality of the environment. The policy has put in place all the criteria that would be needed to promote sustainability. There is an uncertainty related to the effects of the sites on Natura 2000 sites. At the issues and options stage of the assessment certain sites were highlighted as having a potential impact on Natura 2000 sites. None of these sites have been chosen as preferred sites. However, the HRA screening report does not conclude whether there will be likely significant effects on the European Designated Sites and the screening report has not yet been agreed by Natural England.</p> <p>Mitigation measures</p> <p>The HRA screening assessment needs to conclude whether there are likely significant effects on the European Designated Sites and this needs to be agreed with Natural England. Once this has been completed the uncertainty with regard to this objective within the SA should have been addressed.</p>	0	0	0	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.
SA6: Ensure restoration to biodiversity end	0	0	+	<p>Detailed testing criteria should ensure adverse effects on sensitive sites are minimised. In addition, the criteria for</p>	0	0	+	No change

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
use for waste (landfill) sites and contribute to realising local and national BAP targets.				<p>new or extended landfill waste development requires that the development leads to an improvement in the quality of the environment. This may have benefits for BAP species and habitats although this is not spelled out explicitly. This is better addressed as part of Policy WDM2.</p> <p>The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment schedules which are included at the end of this document.</p>				
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	0	0	+	<p>Detailed testing criteria should ensure adverse effects on sensitive sites are minimised. In addition, the criteria for new or extended landfill waste development requires that the development leads to an improvement in the quality of the environment.</p> <p>The policy has put in place all the criteria that would be needed to promote sustainability. However, the detailed effects on the SA criterion of future waste management sites have been tested as part of the site assessments. The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis.</p>	0	0	+	No change

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
				Please see site assessment schedules which are included at the end of this document.				
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.	0	0	+	<p>The self-sufficiency aim is supported by the Highways Agency and should reduce the number of HGVs travelling long distances on the Strategic Road network. The emphasis on reducing waste and ultimately residual waste arisings should contribute in the future to fewer vehicle miles per tonne.</p> <p>The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment schedules which are included at the end of this document.</p>	0	0	+	The emphasis of the policy has slightly changed in that it now sees residual waste facilities sites outside the district as equal sequentially to those within the District (as long as the sites are environmentally preferable). This weakens the self-sufficiency aim of the policy. This could mean that numbers of HGVs does not decrease. However, the general emphasis in the plan of reducing waste and ultimately residual waste arisings means that the effect is still minor positive.
SA9: Reduce nuisance caused to communities by waste transport.	0	0	+	<p>The self-sufficiency aim is supported by the Highways Agency and should reduce the number of HGVs travelling long distances on the Strategic Road network. The emphasis on reducing waste and ultimately residual waste arisings should contribute in the future to less transport of waste.</p> <p>The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment</p>	0	0	+	The emphasis of the policy has slightly changed in that it now sees residual waste facilities sites outside the district as equal sequentially to those within the District (as long as the sites are environmentally preferable). This weakens the self-sufficiency aim of the policy. This could mean that numbers of HGVs does not decrease. However, the general emphasis in the plan of reducing waste and ultimately residual waste arisings means that the effect is still minor positive.

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
				schedules which are included at the end of this document.				
SA10: Encourage a modal shift away from road freight.	0	0	+	Site Assessment Criteria includes a test against site accessibility and against the extent to which non-road (rail, river, canal) access is in place so this may lead to sites which use alternative freight modes.	0	0	+	No change
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	0	0	+	Detailed testing criteria should ensure adverse effects on sensitive sites are minimised. In addition, the criteria for new or extended landfill waste development requires that the development leads to an improvement in the quality of the environment. The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment schedules which are included at the end of this document.	0	0	+	No change
SA12: Avoid, protect and enhance historic assets.	0	0	+	Detailed testing criteria should ensure adverse effects on sensitive sites are minimised. In addition, the criteria for new or extend landfill waste development requires that the development leads to an improvement in the quality of the environment. The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the	0	0	+	No change

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
				full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment schedules which are included at the end of this document.				
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	++	Movement of residual waste facilities to locations within the district will help to achieve this objective.	0	0	0	The emphasis of the policy with regards to self-sufficiency has changed. The policy is likely to have a neutral effect as it is less likely to lead to development within the District.
SA14: Ensure local communities take more responsibility for their own waste	0	0	++	The policy focuses moving the treatment of residual waste within Bradford. Therefore, this should reduce the amount of waste that is treated outside of the district and will be positive for the SA objective.	0	0	0	The emphasis of the policy with regards to self-sufficiency has changed. The policy is not likely to lead to a decrease in the amount of waste that is treated outside the District (although it will not automatically lead to development outside the District). Therefore, the policy has been scored as neutral.
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	0	0	+	Detailed testing criteria should ensure no adverse effects on recreation opportunities as new residual waste facilities are developed in the long term. The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment schedules which are included at the end	0	0	+	No change

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Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)								
				of this document.				
SA16: Reduce the impact of the waste industry on people's safety and security, health and quality of life	0	0	+	Detailed testing criteria should ensure no adverse effects on local communities as new capacity is provided in the long term in Bradford. The policy puts in place the required criteria to ensure the SA objective is achieved. However, an assessment of the full achievement of the SA objective can only be undertaken on a site by site basis. Please see site assessment schedules which are included at the end of this document.	0	0	+	No change
SA17: Support employment in the waste industry for local people.	0	0	+	The policy focuses to on ensuring sufficient supply of landfill waste facilities within Bradford District. In the long term this should help increase number of local jobs in this sector. However, the skill level of jobs in this sector (landfill) is likely to be low (so the policy has not been scored as significant).	0	0	++	The emphasis of the policy has changed so it now encourages residual waste treatment other than landfilling. This will raise skill levels if these kinds of development go ahead so the policy has been scored as major positive.
SA18: Ensure the provision of adequate waste management capacity.	0	0	++	The policy plans for adequate capacity within Bradford in relation to residual waste.	0	0	++	The policy plans for adequate capacity within Bradford (and the sub region) in relation to residual waste.
Summary of the changes to the assessment								
The policy has extended the consideration of the supply of residual landfill sites to those in the West Yorkshire sub region and also discusses the use of alternative sub regional capacity where it provides an environmentally preferable solution (technologies such as gasification, autoclaving etc). The site location criteria have also been amended to include the expansion of existing residual waste facilities outside of the District (where this is environmentally preferable). This has made the results of the SA more positive in most instances.								
Policy W7 is an essential policy as it outlines methods to handle residual waste, which continues to support provision of higher levels of waste treatment within the								

Policy W7: Sites for Residual Waste for Final Disposal (i.e. Landfill)

waste hierarchy. Significant positive impacts are identified in relation to minimising the growth in waste and increasing the amount of waste which is re-used, recycled and recovered, supporting employment in the waste industry for local people and ensuring the provision of adequate waste management capacity. Minor positive impacts are noted for the emphasis on the continued need to reduce residual waste, reducing the District's impact on climate change, protection of air, water and soil resources, biodiversity, landscape, historic assets, public open space, the promotion of the proximity principle and the reduction of the nuisance to communities from waste transport and waste management and encouraging modal shift.

The previous version of the policy as assessed by the SA highlighted two minor negative impacts in relation to objectives which put in place adequate and sustainable treatment facilities and reduce the potential for greenhouse gas emissions caused by waste management. This was because the supporting text to the policy recognised that residual waste is capable of being managed by advanced treatment technologies (for example through gasification, EfW or autoclaving) rather than landfilling however this was not reflected in the policy. The policy has now addressed this issue and these objectives have been scored as positive.

Neutral impacts are identified in relation to biodiversity sites, improving the quality and range of services available within communities and connections to wider networks and ensuring that local communities take more responsibility for their own waste. These impacts were scored as significant positive in the last version of the SA. The scoring has changed because the emphasis of the policy with regards to self-sufficiency has changed. The policy is likely to have a neutral effect as it is less likely to lead to development within the District.

Policy WDM1: Unallocated Sites								
Policy changes from Preferred Approach to Publication Draft: The criteria for deciding on applications for proposals on unallocated sites have been amended. Proposals should now assist in the delivery of the vision and objectives of the DPD and the requirement for the need of the facility has been broadened out from just a local need. The sequential hierarchy has been amended to include existing industrial or employment land, non-restored landfill sites (provided it would not sterilise the extraction of important gas or mineral resources) and fully restored landfill sites. The site should also be sequentially preferable to the named sites in Policy W3 and compliant with all other planning policy.								
Policy changes between Publication Draft and Submission Draft: no change								
Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	0	0	0	This policy makes provision if needed for waste management proposals on unallocated sites. The appraisal questions aren't directly applicable, although the first criteria is that the site comes forward in accordance with the waste hierarchy and that there is a need in the local area. So the policy is not in conflict with this objective.	0	0	0	No change
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	0	+	+	Any unallocated site must come forward in accordance with the waste hierarchy and demonstrate that there is a need in the local area. Therefore, if sites come forward they should help to meet the appraisal objective and most of the appraisal questions (it is uncertain if it they will help to achieve appraisal question 4).	0	+	+	No change
SA3: Reduce the District's impact on	0	+	+	The need to demonstrate a site's contribution to the waste hierarchy and the site assessment criteria should help	0	+	+	No change

Policy WDM1: Unallocated Sites								
climate change and vulnerability to its effects.				<p>ensure that sites are in the most sustainable location and also are using the most suitable technology. This will help to reduce emissions associated with the waste management.</p> <p>Climate change adaptation and flood risk are not included as site criteria within Appendix 1 and although Policy WDM2 refers to minimising effects on flood plains, future proofing the new facilities against impacts of climate change needs to be explicitly dealt with when assessing site proposals. This is dealt with in the assessment of Policy WDM2. Policy WDM2 also addresses BREEAM requirements (which address renewable energy).</p>				
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	0	+	+	<p>This is difficult to assess due to the unknown location of unallocated sites. However, given the tests that are required against site assessment criteria, sites should not progress that adversely affect people through pollution and nuisance and areas valued for their environmental importance. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.</p>	0	+	+	No change
SA5: To conserve, restore, expand and enhance the internationally, nationally and	0	+	+	<p>This is difficult to assess due to the unknown location of unallocated sites. However, given the tests that are required against site assessment criteria, sites should not progress that adversely affect (through siting or waste transport) areas valued for their environmental importance.</p>	0	+	+	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.

Policy WDM1: Unallocated Sites								
locally valued wildlife species and habitats.				Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.				
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	0	+	+	This is difficult to assess due to the unknown location of unallocated sites. However, given the tests that are required against site assessment criteria, sites should not progress that adversely affect BAP habitats or key areas for protected species. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	0	+	+	This is difficult to assess due to the unknown location of unallocated sites. However, given the tests that are required against site assessment criteria, sites should not progress that adversely affect (through siting or waste transport) areas valued for their environmental importance. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage	0	+	+	This is difficult to assess due to the unknown location of unallocated sites. However, Site Assessment Criteria includes a test against site accessibility and location in relation to source of waste so the outcome should be positive in relation to this objective. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change

Policy WDM1: Unallocated Sites								
travelled and encouraging waste segregation in new development.								
SA9: Reduce nuisance caused to communities by waste transport.	0	+	+	This is difficult to assess due to the unknown location of unallocated sites. However, given the tests that are required against site assessment criteria, sites should not progress that adversely affect (through siting or waste transport) communities or areas valued for their environmental importance. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change
SA10: Encourage a modal shift away from road freight.	0	+	+	The Site Assessment Criteria include a test against site accessibility and against the extent to which non-road (rail, river, canal) access is in place so this should be positive against this SA objective. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change
SA11: Improve the quality of the built environment, protect and enhance historic assets and	0	+	+	Testing against the Site Assessment Criteria should ensure adverse effects on the quality of the built environment are minimised. The sequential test incorporates the consideration of previously developed land so the policy will also be positive in this regard.	0	+	+	No change

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Policy WDM1: Unallocated Sites								
make efficient use of land.				Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.				
SA12: Avoid, protect and enhance historic assets.	0	+	+	Testing against the Site Assessment Criteria should ensure adverse effects on historic assets are minimised. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	++	++	Site accessibility is one of the site assessment criteria that will be considered if there is a need for unallocated sites so the SA objective will be met in full by this policy.	0	++	++	No change
SA14: Ensure local communities take more responsibility for their own waste	0	++	++	The policy will provide further flexibility in the provision of waste management facilities in the district if there is a need in the local area. The SA objective will be met in full by this policy.	0	++	++	No change
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	0	+	+	Testing against the Site Assessment Criteria should ensure no adverse effects on local communities as new capacity is provided in the long term in Bradford. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change

Policy WDM1: Unallocated Sites								
SA16: Reduce the impact of the waste industry on people’s safety and security, health and quality of life	0	+	+	Testing against the Site Assessment Criteria should ensure no adverse effects on local communities as new capacity is provided in the long term in Bradford. Because the locations of sites are not known, however, it is not possible to state that the policy will be significantly positive.	0	+	+	No change
SA17: Support employment in the waste industry for local people.	0	+	+	This policy should help to provide for more local jobs by allowing for further flexibility in the provision of waste management facilities in the district if there is a need in the local area. It is not possible to predict how skilled these jobs will be.	0	+	+	No change
SA18: Ensure the provision of adequate waste management capacity.	0	++	++	Making provision for the assessment of unallocated sites provides the flexibility to meet capacity if allocated sites are lost or existing facilities are lost. The SA objective will be met in full by this policy.	0	++	++	No change

Summary of the changes to the assessment

The criteria for deciding on applications for proposals on unallocated sites have been amended. Proposals should now assist in the delivery of the vision and objectives of the DPD and the requirement for the need of the facility has been broadened out from just a local need. The sequential hierarchy has been amended to include existing industrial or employment land, non-restored landfill sites (provided it would not sterilise the extraction of important gas or mineral resources) and fully restored landfill sites. The site should also be sequentially preferable to the named sites in Policy W3 and compliant with all other planning policy. The changes to the policy have not changed the results of the SA.

The criteria included in the policy intend to ensure that the main drivers of delivering Bradford’s waste hierarchy, the proximity principle and self-sufficiency are achieved. The site assessment criteria used to analyse any unallocated sites should avoid adversely affecting people through noise, nuisance dust and traffic and avoid creating other environmental impacts on biodiversity and sensitive areas. Hence minor positive impacts are identified for objectives that protect biodiversity, jobs, landscape, historic assets and public open space, seek to minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered, seek to mitigate against climate change, safeguard and improve air, water and soil resources, encourage a modal shift away from road freight and reduce nuisance caused to communities by waste transport.

Significant positive impacts are identified for objectives that seek to improve the accessibility of waste management and treatment services to centres of population,

Policy WDM1: Unallocated Sites

reduce the amount of waste that is treated outside of the District, and ensure the provision of adequate waste management capacity. The policy will provide further flexibility in the provision of waste management facilities in the district if there is a need in the local area and so will positively support the achievement of these objectives.

There are no negative impacts identified.

Neutral impacts are identified in relation to the prudent and efficient use of energy and natural resources and the promotion of renewable energy. The appraisal questions aren't directly applicable and not in conflict with this objective.

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities

Policy changes from Preferred Approach to Publication Draft: Proposals must now demonstrate that they will not adversely affect the historic environment. Proposals should be in accordance with the waste hierarchy, help to deliver the vision and objectives of the DPD and must demonstrate a need for the facility. The consideration of the impact on designated areas has been broadened to include designated structures and also Local Plan designations. The effect on archaeological interest must now be assessed. Heritage statements and Strategic Flood Risk Assessment s (for sites over 1ha) must now be provided. The consideration of BREEAM excellent has been amended by the addition of the phrase “where economically viable”. The final change is that proposals should demonstrate the mitigation of emissions including the consideration of cleaner fuels and technologies.

Policy changes between Publication Draft and Submission Draft: the policy has been updated to include reference to investigating the potential of transporting waste by non-road transport nodes. A requirement has also been added for applicants to demonstrate that biodiversity enhancement has been fully investigated through preparation of an ecological assessment.

Policy changes between Submission Draft and Submission Draft Proposed Modifications: the policy has been updated to include reference to enhancement of landscape and visual amenity and of areas designated for nature conservation, and to state that adverse effects on European Designated Sites must be avoided through appropriate mitigation.

SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	This is a development control type policy that acts as criteria to be considered under the main strategic objectives. As a result, the policy does not focus on minimising production of waste or waste that requires treatment. These appraisal questions are not directly relevant. However, it includes suitable criteria to minimise adverse impacts on water resources and requires that new, expanded and residual waste management facilities meet BREEAM excellent standards. BREEAM looks at sustainable methods of construction including minimising use of water.	+	+	+	The addition of the phrase “where economically viable” has weakened the requirement to meet BREEAM excellent. However, the policy does still address minimising effects on the water environment so has still been scored as positive.
SA2: Minimise	0	0	0	This is a development control policy that	0	0	0	No change

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
the growth in waste and increase the amount of waste which is re-used, recycled and recovered.				should help guide the development of sustainable treatment facilities that minimise adverse effects. However, the policy itself will not help to minimise growth in waste so the policy has been scored as neutral.				
SA3: Reduce the District’s impact on climate change and vulnerability to its effects.	+	+	+	<p>Requirement for BREEAM standard Excellent will help to reduce CO2 emissions associated with new and existing facilities. It should also help encourage the development of renewables and energy efficiency within facilities (as the BREEAM scheme addresses these issues).</p> <p>The policy requires assessment of the facilities on the environment but not of the environment on the facilities. Although Policy WDM2 refers to minimising effects on flood plains, future proofing the new facilities against impacts of climate change needs to be explicitly dealt with when assessing site proposals.</p> <p>Because the policy will help to meet achieve one of the appraisal questions but not the other it has been scored as minor positive.</p> <p><u>Enhancement measures</u> Future climate proofing should be a requirement to reduce the vulnerability of waste management facilities.</p>	0	0	0	<p>The addition of the phrase “where economically viable” has weakened the requirement to meet BREEAM excellent. Without the requirement to achieve BREEAM excellent the policy will still help to achieve some of the SA objectives so will still score minor positive. The policy will help to reduce emissions and recover energy. However, it will not address climate change adaptation.</p> <p><u>Outstanding enhancement measure</u> Future climate proofing should be a requirement to reduce the vulnerability of waste management facilities. This needs to include issues such as ensuring adequate drainage is in place.</p>

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	+	+	+	This policy fully supports the first appraisal question through ensuring that human health effects are assessed for each waste management development. The second appraisal question has been assessed through the site appraisal process.	+	+	+	No change
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	-	-	-	Protection of designated sites is accounted for in the policy. However, the policy refers to the minimisation of effects. Government guidance (in the form of PPS9) stresses the importance of enhancing biodiversity. The policy would be much stronger if this emphasis was changed. The policy does not address the effects of sites on habitat loss or fragmentation. <u>Mitigation measures</u> The emphasis of the policy should be changed from minimisation of harm to enhancement of biodiversity. It would be useful if the policy addressed the effects of sites on habitat loss or fragmentation.	+	+	+	The policy has been strengthened to include reference to enhancement of areas designated for nature conservation.
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute	-	-	-	The policy requires that adverse environmental effects are minimised. This may go some way to ensuring that actions do not compromise BAP targets. However, this is not explicit in the policy. If the policy is changed to introduce the	+	+	+	A HRA screening assessment has been undertaken and it concluded that the wording of this policy should be changed. The policy has subsequently been strengthened to state that adverse effects on European Designated Sites must be

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
to realising local and national BAP targets.				<p>concept of enhancement (see above) it would also be useful to add a reference to helping to reach targets outlined in BAPs. The policy also does not address restoration to biodiversity. However, this may be better addressed in the landfill policy (policy WDM5).</p> <p><u>Mitigation measures</u></p> <p>The emphasis of the policy should be changed from minimisation of harm to enhancement of biodiversity (including of a long term nature through restoration) and this should include reference to development helping to meet targets outlined in BAPs.</p>				<p>avoided through appropriate mitigation. In addition, the policy has been strengthened to include reference to enhancement of areas designated for nature conservation.</p> <p><u>Outstanding mitigation measure</u></p> <p>The emphasis of the policy should be changed from minimisation of harm to enhancement of biodiversity. It would be useful if the policy addressed the effects of sites on habitat loss or fragmentation.</p>
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	-	-	-	<p>The policy is clear that minimising adverse effects on the landscape is required. However, as with biodiversity it is felt that the policy should be focused on enhancement where possible.</p> <p><u>Mitigation measures</u></p> <p>Opportunities for landscape enhancement (including of a long term nature through restoration) should be sought to avoid cumulative negative effects.</p>	+	+	+	The policy has been strengthened to include reference to enhancement of landscape and visual amenity.
SA8: Increase proximity of waste management infrastructure to current and future centres of population in	+	+	+	<p>This policy supports the criteria set out in appendix 1 which requires that sites should be assessed against their location in relation to current / future waste arisings.</p>	+	+	+	The policy has been strengthened to include reference to enhancement of landscape and visual amenity.

Bradford Waste Management DPD – proposed modifications

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
order to reduce mileage travelled and encouraging waste segregation in new development.								
SA9: Reduce nuisance caused to communities by waste transport.	+	+	+	The requirement to reduce the need to travel and assessment of accessibility is included in the site assessment criteria. There is also a requirement to demonstrate that adverse effects are minimised in terms of environmental and social effects. This will mean that there is a greater likelihood that nuisance caused by waste management sites can be reduced.	+	+	+	No change
SA10: Encourage a modal shift away from road freight.	?	?	?	It is not possible to assess whether the policy will lead to the achievement of the SA objective. This is difficult to achieve as transport by road is the principal means currently and sites with easy and cheap access to the rail and waterways network will be relatively rare. <u>Mitigation measures</u> More emphasis should be given in the policy to supporting sites where non-road transport is a possibility.	?	?	?	No change
SA11: Improve the quality of the built environment,	+	+	+	The main strategic policies (and the sites assessment criteria) require a focus on PDL. The requirement to demonstrate that a	++	++	++	No change <u>Outstanding mitigation measure</u> More emphasis should be given in the

Bradford Waste Management DPD – proposed modifications

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
protect and enhance historic assets and make efficient use of land.				facilities' design, setting and external appearance is of a scale, mass form and character appropriate to its location and landscape setting should mean that there is a greater likelihood that the SA objectives are met.				policy to supporting sites where non-road transport is a possibility.
SA12: Avoid, protect and enhance historic assets.	+	+	+	The policy requires that environmental effects are minimised. There is also the requirement to demonstrate that a facilities' design, setting and external appearance is of a scale, mass form and character appropriate to its location and landscape setting. This should mean that there is a greater likelihood that the SA objectives are met.	++	++	++	The policy as proposed must now demonstrate that they will not adversely affect the historic environment, the consideration of the impact on designated areas has been broadened to include designated structures and also Local Plan designations. In addition, the effect on archaeological interest must now be assessed and a Heritage Statement provided. The policy will now have a significant positive effect as it answers all the applicable appraisal questions positively.
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	The requirement to reduce the need to travel and assessment of accessibility is included in the strategic policies and in the site assessment criteria in Appendix 1.	0	0	0	The policy as proposals must now demonstrate that they will not adversely affect the historic environment, the consideration of the impact on designated areas has been broadened to include designated structures and also Local Plan designations. In addition, the effect on archaeological interest must now be assessed and a Heritage Statement provided. The policy will now have a significant positive effect as it answers all the applicable appraisal questions positively.
SA14: Ensure	0	0	0	Other policies (and the site allocations)	0	0	0	No change

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
local communities take more responsibility for their own waste				will help to meet this SA objective.				
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	?	?	?	<p>The policy requires that human health effects and environmental effects are minimised. It is assumed that this addresses impacts on open space. However, it would be better if this was made clearer in the policy. There is also the requirement to demonstrate that a facilities' design, setting and external appearance is of a scale, mass form and character appropriate to its location and landscape setting.</p> <p><u>Mitigation measures</u></p> <p>Make it clearer in the policy that areas of open space / recreation are protected within policy.</p>	?	?	?	No change
SA16: Reduce the impact of the waste industry on people's safety and security, health and quality of life	+	+	+	<p>The policy requires that social and economic effects are minimised. This includes health, noise, vibrations, dust, odour, air, water and light pollution.</p> <p>The requirement to consider whether "it is appropriate to setting" should result in the testing of the potential cumulative effect of any new facilities and this should mean that there is a greater likelihood that the SA objectives are met.</p>	+	+	+	<p>No change</p> <p><u>Outstanding mitigation measure</u></p> <p>Make it clearer in the policy that areas of open space / recreation are protected within policy.</p>
SA17: Support employment in	0	0	0	No effect	0	0	0	No change

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities								
the waste industry for local people.								
SA18: Ensure the provision of adequate waste management capacity.	0	0	0	No effect	0	0	0	No change
<p>Summary of the changes to the assessment</p> <p>The changes to the policy have caused some changes to the results of the SA. Although the policy will still help to achieve some sustainability objectives, the addition of the phrase “where economically viable” has weakened the requirement to meet BREEAM excellent and has, therefore, weakened the sustainability credentials of the policy.</p> <p>However, the policy has been strengthened in its consideration of heritage and archaeological issues and now scores significantly positive against the two SA objectives that address these issues.</p> <p>A HRA screening assessment has now been undertaken and concludes that the wording of this policy should be changed (see below). Currently the policy requires adverse effects to be minimised which is not strong enough to conclude that the plan will not have an adverse effect on European Sites.</p> <p>The uncertain and minor negative effects recorded during the appraisal of the previous draft of this policy still stand.</p> <p>This is a development control policy which includes the necessary criteria to meet the requirements of national legislation and most SA objectives. The policy will not have any significant negative effects. The policy will have significant positive effects on enhancing historic assets and improving the quality of the built environment. Minor negative impacts are included for biodiversity and landscape. In terms of biodiversity, protection of designated sites is accounted for in the policy but the policy would be stronger if it addressed the importance of enhancing biodiversity. The policy does not address the effects of sites on habitat loss or fragmentation. For landscape the policy is clear that minimising adverse effects on the landscape is required. However, as with biodiversity it is felt that the policy should be focused on enhancement where possible. Minor positive impacts are recorded for climate mitigation, reducing the amount of pollution and nuisance caused by waste management, and increasing proximity of waste management infrastructure to current and future centres of population. Neutral impacts are identified for objectives related to ensuring adequate waste management capacity, supporting job creation, improving accessibility, minimising the growth in waste and increasing waste treatment in the district.</p> <p>There is uncertainty regarding outcomes for open space and the effects on modal shift.</p> <p><u>Mitigation measures outstanding</u></p> <p>The emphasis of the policy should be changed from minimisation of harm to enhancement of biodiversity. It would be useful if the policy addressed the effects of sites on habitat loss or fragmentation.</p> <p>The emphasis of the policy should be changed from minimisation of harm to enhancement of biodiversity (including of a long term nature through restoration) and this</p>								

Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities

should include reference to development helping to meet targets outlined in BAPs.

Opportunities for landscape enhancement (including of a long term nature through restoration) should be sought to avoid cumulative negative effects.

More emphasis should be given in the policy to supporting sites where non-road transport is a possibility.

Make it clearer in the policy that areas of open space / recreation are protected within policy.

Enhancement measures outstanding

Climate change adaptation - The policy requires assessment of the facilities on the environment but not of the environment on the facilities. Future climate proofing could be a requirement to reduce the vulnerability of waste management facilities. This needs to include issues such as ensuring adequate drainage is in place.

Policy WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility								
Policy changes between Preferred Approach and Publication Draft: There were no significant changes to the policy								
Policy changes between Publication Draft and Submission Draft: no change								
Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change								
SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	0	0	0	No effect	0	0	0	No change
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	++	++	++	The policy safeguards existing waste management facilities. A strict set of criteria must be met to justify the loss of a site and this will help to meet the SA objective.	++	++	++	No change
SA3: Reduce the District's impact on climate change and vulnerability to	0	0	0	No effect	0	0	0	No change

Bradford Waste Management DPD – proposed modifications

Policy WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility								
its effects.								
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	0	0	0	No effect	0	0	0	No change
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	0	0	0	No effect	0	0	0	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	0	0	0	No effect	0	0	0	No change
SA7: To maintain,	0	0	0	No effect	0	0	0	No change

Bradford Waste Management DPD – proposed modifications

Policy WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility								
restore and enhance the character, value and diversity of natural and man-made landscapes.								
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.	0	0	0	No effect	0	0	0	No change
SA9: Reduce nuisance caused to communities by waste transport.	0	0	0	No effect	0	0	0	No change
SA10: Encourage a modal shift away from road	0	0	0	No effect	0	0	0	No change

Policy WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility								
freight.								
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	0	0	0	No effect	0	0	0	No change
SA12: Avoid, protect and enhance historic assets.	0	0	0	No effect	0	0	0	No change
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	No effect	0	0	0	No change
SA14: Ensure local communities take more responsibility for their own waste	+	+	+	It is important that there is a net gain of sites. Safeguarding of existing sites is important to achieve this.	+	+	+	No change
SA15: Avoid impacts on open	0	0	0	No effect	0	0	0	No change

Policy WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility								
space, cultural, leisure and recreation opportunities								
SA16: Reduce the impact of the waste industry on people’s safety and security, health and quality of life	0	0	0	No effect	0	0	0	No change
SA17: Support employment in the waste industry for local people.	+	+	+	It is important that there is a net gain of sites. Safeguarding of existing sites is important to achieve this.	+	+	+	No change
SA18: Ensure the provision of adequate waste management capacity.	+	+	+	It is important that there is a net gain of sites. Safeguarding of existing sites is important to achieve this.	+	+	+	No change
Summary of the changes to the assessment								
<p>There have been no changes to the policy. A neutral impact has been identified for the majority of objectives as the policy is considered to have no effect. This is because the policy is very focused and relates only to the proposed loss of waste management sites. It is unlikely to have any direct impacts on environmental designations and sensitivities.</p> <p>Significant positive impacts were identified in relation to minimising the growth in waste and increase the amount of waste which is re-used, recycled and recovered. Whilst minor positive impacts were identified in relation to ensuring local communities take more responsibility for their own waste, supporting employment in the waste industry for local people and ensuring the provision of adequate waste management capacity. These positive scores all relate to the point that the strict criteria should appropriately safeguard sites and help ensure that there is an increase in capacity of waste management facilities in the district where and when needed.</p>								

Policy WDM4: Waste Management within Development

Policy changes between Preferred Approach and Publication Draft: The policy has been changed to state that proposals for new development will only be permitted where they demonstrate the minimisation of waste from construction and contribute to climate change mitigation.

Policy changes between Publication Draft and Submission Draft: the policy has been updated with an additional requirement for new development to maximise opportunities to contribute to climate change mitigation and priorities

Policy changes between Submission Draft and Submission Draft Proposed Modifications: no change

SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	++	++	++	The policy requires re-use and recycling of construction materials for new development and will lead to a reduction in the total amount of waste that will require treatment from construction and demolition and promotes water efficient design.	++	++	++	The policy has been strengthened in that it now requires the minimisation of waste from construction. It will still score significantly positive against the SA objective.
SA2: Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.	++	++	++	The policy should help to achieve target recovery and recycling rates for CDEW and as a result contribute to a reduction in total amounts going to landfill.	++	++	++	The policy has been strengthened in that it now requires the minimisation of waste from construction. It will still score significantly positive against the SA objective.
SA3: Reduce the District's impact on climate change and	+	+	+	Climate mitigation through reduction of CO2 emitted and encouragement of energy efficient design and on-site generation is included in the policy. The policy does not address climate change	++	++	++	The policy has been strengthened in that it now requires that new development contributes to climate change mitigation. The policy will have a significant positive

Policy WDM4: Waste Management within Development								
vulnerability to its effects.				adaptation of new development but it would not be expected to.				effect against the SA objective.
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	?	?	?	It is uncertain whether the on-site use and recovery of CDEW will reduce nuisance especially for local people close to the development. Minimisation of transport of the waste would reduce nuisance and pollution but the implementation of specific on-site waste arrangements is needed to ensure no adverse effects. <u>Mitigation measures</u> It will be important that measures are put in place (as part of planning application procedures) to ensure that the on-site use and recovery of CDEW does not cause undue nuisance.	?	?	?	No change <u>Outstanding mitigation measure</u> It will be important that measures are put in place (as part of planning application procedures) to ensure that the on-site use and recovery of CDEW does not cause undue nuisance.
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	0	0	0	No effect	0	0	0	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy.
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local	0	0	0	No effect	0	0	0	No change

Policy WDM4: Waste Management within Development								
and national BAP targets.								
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	0	0	0	No effect	0	0	0	No change
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.	+	+	+	The policy will help residents of new development to segregate their waste. The policy states that the appropriate management arrangements are in place for waste arisings generated by the development.	+	+	+	No change
SA9: Reduce nuisance caused to communities by waste transport.	0	0	0	No effect.	0	0	0	No change

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Policy WDM4: Waste Management within Development								
SA10: Encourage a modal shift away from road freight.	0	0	0	No effect.	0	0	0	No change
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	0	0	0	No effect.	0	0	0	No change
SA12: Avoid, protect and enhance historic assets.	0	0	0	No effect.	0	0	0	No change
SA13: Improve the quality and range of services available within communities and connections to wider networks.	0	0	0	No effect.	0	0	0	No change
SA14: Ensure local communities take more responsibility for their own	0	0	0	No effect.	0	0	0	No change

Policy WDM4: Waste Management within Development								
waste								
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	0	0	0	No effect.	0	0	0	No change
SA16: Reduce the impact of the waste industry on people’s safety and security, health and quality of life	0	0	0	No effect.	0	0	0	No change
SA17: Support employment in the waste industry for local people.	+	+	+	As standards and requirements for designs are strengthened expertise will be required to help deliver on water efficiency, on-site generation and recovery or recycling of materials.	+	+	+	No change
SA18: Ensure the provision of adequate waste management capacity.	+	+	+	Rather than increase provision this should reduce the waste that requires off-site disposal or processing and therefore the need for additional capacity in the District.	+	+	+	No change

Summary of the changes to the assessment

The policy has been changed to state that proposals for new development will only be permitted where they demonstrate the minimisation of waste from construction and contribute to climate change mitigation. This has strengthened the policy and made a small number of the positive effects of the previous policy even more positive.

Significant positive impacts are recorded for ensuring the prudent and efficient use of energy and natural resources, the promotion of renewable energy and climate mitigation as the policy requires re-use and recycling of construction materials for new development, and will lead to a reduction in total amount of waste that will require treatment from construction and demolition and promotes water efficient design. Significant positive effects are also recorded for minimising the growth in

Policy WDM4: Waste Management within Development

waste and increasing the amount of waste which is re-used, recycled and recovered as the policy should help to achieve target recovery and recycling rates for CDEW and as a result contribute to a reduction in total amounts going to landfill.

Minor positive effects are identified for supporting employment in the waste industry for local people, and ensuring the provision of adequate waste management capacity.

There is uncertainty regarding the assessment against the objective to safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites as it is uncertain whether the on-site use and recovery of CDEW will reduce nuisance especially for local people close to the development. Minimisation of transport of the waste would reduce nuisance and pollution but the implementation of specific on-site waste arrangements is needed to ensure no adverse effects.

The remainder of the objectives have been scored as neutral as it is considered that this policy will have no effect on these objectives. This is because the policy is a very focused policy relating to the provision of waste management facilities within development. It is unlikely to have any direct impacts on environmental designations and sensitivities.

Mitigation measures outstanding

It will be important that measures are put in place (as part of planning application procedures) to ensure that the on-site use and recovery of CDEW does not cause undue nuisance.

Policy WDM5: Landfill Development for Final Disposal of Residual Waste

Policy changes from Preferred Approach to Publication Draft: The policy has strengthened the emphasis on landfill being the last resort in the waste hierarchy. The policy has added a requirement that development on mineral extraction sites should not sterilise the extraction of gas or mineral resources. It has added the consideration of unrestored mineral sites as a potential area where landfill sites would be acceptable. The policy has removed the references to applications meeting construction standards and BREEAM excellent. The final change is that proposals should demonstrate the mitigation of emissions including the consideration of cleaner fuels and technologies.

Policy changes between Publication Draft and Submission Draft: no change.

Policy changes between Submission Draft and Submission Draft Proposed Modifications: the policy has been updated to include reference to minimising adverse effects on designated areas and to investigating the potential of transporting waste by non-road transport modes.

SA Objectives	Assessment of the Preferred Approach Draft Plan				Changes to the assessment between the Preferred Approach and the Submission Draft Proposed Modifications			
	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement	Short term	Medium term	Long term	Explanation of assessment and mitigation / enhancement
SA1: Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	+	+	+	Ensuring that sites are permitted in accordance with the waste hierarchy will ensure that waste only reaches landfill where there is no other (more sustainable) option. Requirement for BREEAM excellent standards on all facilities should improve the environmental construction standards whilst making efficient use of water in those facilities. The criteria also require that adverse effects on floodplains, groundwater and water quality are minimised.	+	+	+	The references to sustainable construction and BREEAM have been removed from the policy and this has weakened the policy in relation to impacts on water resources. However, the policy does still address minimising effects on the water environment so has still been scored as positive.
SA2: Minimise the growth in waste and increase the amount of waste which is re-used,	+	+	+	Provision of landfill sites is necessary in a sustainable hierarchy of waste management as waste that cannot be treated in any other way would need to be landfilled. The criteria included in the policy ensure that landfill is at the	+	+	+	No change

Policy WDM5: Landfill Development for Final Disposal of Residual Waste								
recycled and recovered.				appropriate place in the hierarchy.				
SA3: Reduce the District’s impact on climate change and vulnerability to its effects.	+	+	+	<p>The requirement for BREEAM standards and energy efficiency should reduce the CO₂ emissions associated with the running of the facilities. Mention is given to the need to maximise opportunities to recover energy which could relate to the combustion of biogas.</p> <p>However, the policy could go further in encouraging climate adaptation. Vulnerability to climate change, risks from extreme weather events, flooding hotter summers, etc. should be taken into account in the design and siting of these facilities.</p> <p>Enhancement measures</p> <p>The policy could go further in encouraging climate adaptation. Vulnerability to climate change, risks from extreme weather events, flooding hotter summers, etc. should be taken into account in the design and siting of these facilities.</p>	0	0	0	<p>The references to sustainable construction and BREEAM have been removed from the policy. Without these requirements the policy will still help to achieve some of the SA objectives so will still score minor positive. The policy will help to reduce emissions and recover energy. However, it will not address climate change adaptation.</p> <p>Outstanding enhancement measure</p> <p>The policy could go further in encouraging climate adaptation. Vulnerability to climate change, risks from extreme weather events, flooding hotter summers, etc. should be taken into account in the design and siting of these facilities.</p>
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management	+	+	+	<p>The policy should provide for development of sites that do not adversely affect people and/or exacerbate existing nuisance problems through the detailed criteria landfill sites must meet.</p> <p>The second appraisal question has been assessed as part of the site assessments.</p>	+	+	+	No change

Policy WDM5: Landfill Development for Final Disposal of Residual Waste								
sites								
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	-	-	-	The policy contains criteria to that the applicant should demonstrate that adverse effects are minimised on designated protected sites. However, the policy does not address habitat loss or fragmentation. <u>Mitigation measures</u> The policy should address the effects of sites on habitat loss or fragmentation.	0	0	0	A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this policy. The policy has been updated to include reference to minimising adverse effects on designated areas, including habitat loss and fragmentation.
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	+	+	+	The policy requires that adverse environmental effects are minimised. This may go some way to ensuring that actions do not compromise BAP targets. If the mitigation measure suggested as part of policy WDM2 is followed then the effect of this policy will be positive. The policy also does not address restoration to biodiversity specifically although this is mentioned in the supporting text. <u>Enhancement measure</u> The emphasis of WDM2 should be changed from minimisation of harm to enhancement of biodiversity (including of a long term nature through restoration) and this should include reference to development helping to meet targets outlined in BAPs.	+	+	+	No change <u>Outstanding enhancement measure</u> The emphasis of WDM2 should be changed from minimisation of harm to enhancement of biodiversity (including of a long term nature through restoration) and this should include reference to development helping to meet targets outlined in BAPs.
SA7: To maintain, restore and	+	+	+	Effects on landscape depend on siting and control of impacts of the waste facility. Criteria are included within the policy to	+	+	+	No change

Policy WDM5: Landfill Development for Final Disposal of Residual Waste							
enhance the character, value and diversity of natural and man-made landscapes.				minimise effects on visual and landscape amenity.			
SA8: Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled and encouraging waste segregation in new development.	+	+	+	The policy requires that the applicant demonstrates that adverse effects are minimised on transport accessibility, capacity and the need to travel.	+	+	+
SA9: Reduce nuisance caused to communities by waste transport.	+	+	+	The policy requires that the applicant demonstrates that adverse effects are minimised on transport accessibility, capacity and the need to travel.	+	+	+
SA10: Encourage a modal shift away from road freight.	?	?	?	It is not possible to assess whether the policy will lead to the achievement of this SA objective. This is difficult to achieve as transport by road is the principal means currently and sites with easy and cheap	0	0	0
							The policy has been strengthened to include reference to investigating the potential of transporting waste by non-road transport modes. However, this is likely to lead to a neutral effect due to the

Policy WDM5: Landfill Development for Final Disposal of Residual Waste								
				<p>access to the rail and waterways network will be relatively rare. If the mitigation measure in WMD2 is included in that policy this will help mitigate the effects of this policy.</p> <p><u>Mitigation measures</u></p> <p>More emphasis should be given in Policy WM2 to supporting sites where non-road transport is a possibility.</p>				difficulty of achieving access to the rail and waterways network.
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	+	+	+	A sequential approach is included which requires a focus first on existing sites and then PDL.	+	+	+	No change
SA12: Avoid, protect and enhance historic assets.	+	+	+	The specific site criteria require demonstrating that areas of historic importance are protected.	+	+	+	No change
SA13: Improve the quality and range of services available within communities and connections to wider networks.	+	+	+	The sequential test criteria should help ensure sites are located in convenient and sustainable locations.	+	+	+	No change
SA14: Ensure	0	0	0	Considered on its own the policy might be	0	0	0	No change

Bradford Waste Management DPD – proposed modifications

Policy WDM5: Landfill Development for Final Disposal of Residual Waste								
local communities take more responsibility for their own waste				seen as encouraging the same approach of managing waste through landfilling. However, the plan is clear through the other policies (and this is reaffirmed in the policy) that Bradford is looking for a step change to move the management of waste up the waste hierarchy.				
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	+	+	+	Effects on open space and recreation opportunities depend on siting and control of impacts of the waste facility. Criteria are included within the policy to minimise environmental, social or economic effects	+	+	+	No change
SA16: Reduce the impact of the waste industry on people's safety and security, health and quality of life	+	+	+	Effects on people depend on siting and control of impacts of the waste facility. Criteria are included within the policy to minimise environmental, social or economic effects.	+	+	+	No change
SA17: Support employment in the waste industry for local people.	+	+	+	New or expanded landfill sites in the district will create more jobs related to this sector. There will also be the need for jobs in restoration and aftercare. By allowing the area of need to extend to the Bradford sub region larger or more facilities may be sited within Bradford District.	+	+	+	No change
SA18: Ensure the provision of adequate waste management capacity	++	++	++	The policy allows for proposals for new or expanded landfill developments (under certain criteria) and therefore looks to continue to provide for sufficient residual waste capacity in the future	++	++	++	No change

Policy WDM5: Landfill Development for Final Disposal of Residual Waste**Summary of the changes to the assessment**

The changes to the policy have caused some changes to the results of the SA. Although the policy will still help to achieve some sustainability objectives, the removal of the consideration of sustainable construction and the requirement to achieve BREEAM has weakened the sustainability credentials of the policy.

It is necessary to have such a policy to make adequate provision for residual waste disposal in the future in the District. The criteria included within the policy have resulted in a positive minor impact for the assessment on the majority of objectives including the prudent and efficient use of energy and natural resources and the promotion of renewable energy, climate change mitigation, effects on soil, water, air, landscape, use of PDL, historic assets, open space, quality of life and support of local employment. There are also significant positive impacts in relation to provision of adequate facilities into the future.

Uncertainties remain for the achievement of modal shift from road to rail. It is not possible to assess whether the policy will lead to the achievement of the SA objective. This is difficult to achieve as transport by road is the principal means currently and sites with easy and cheap access to the rail and waterways network will be relatively rare. Therefore it needs to be strongly promoted.

A minor negative impact has been identified with regard to biodiversity as the policy does not address habitat loss or fragmentation.

Mitigation measures outstanding

It would be useful if the policy addressed the effects of sites on habitat loss or fragmentation.

More emphasis should be given in Policy WMD4 to supporting sites where non-road transport is a possibility.

Enhancement measures outstanding

The policy could go further in encouraging climate adaptation. Vulnerability to climate change, risks from extreme weather events, flooding hotter summers, etc. should be taken into account in the design and siting of these facilities.

The emphasis of WDM2 should be changed from minimisation of harm to enhancement of biodiversity (including of a long term nature through restoration) and this should include reference to development helping to meet targets outlined in BAPs.

3. SITE ASSESSMENT MATRICES

The matrices below show the results of the appraisal of the sites contained in Policy W3. Six sites have been assessed, three in each matrix. Please note that a number of objectives and appraisal questions which were not considered to be relevant to the site assessment process (due to the fact that the objectives were not spatial in nature) are not addressed within the assessments below.

These matrices represent only the assessment of the chosen sites. A large number of alternative sites have been assessed. Please see the accompanying SA report for a discussion of the other sites that have been assessed.

3.1 Matrix 1 – Sites WM1, WM2 and WM3

SA Objectives	Sites					
	Site WM1 (formerly Site 1)		Site WM2 (formerly Site 11)		Site WM3 (formerly Site 78)	
SA3: Reduce the District's impact on climate change and vulnerability to its effects.	-	The site is located close to a stream and a small part of the site has the potential to experience flooding issues. The Environment Agency flood mapping shows that a small part of the site is located in Flood Zone 3. Depending on the choice of waste management technology, fuel may be produced for use elsewhere (e.g. pyrolysis oil, electricity from gasification).	+	It is 2.35ha in size and can incorporate most waste management technologies, and there may be potential recipients nearby of heat and electricity generated by the selected waste management technology. Some of these technologies may produce fuels for use elsewhere (e.g. pyrolysis oil, electricity from gasification). No flood risk constraints identified.	+	According to the Environment Agency flood maps, the site is outside of any areas at risk from flooding.
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	-	The entire site is PDL, situated immediately south of Clayton Beck. The nearest AQMA is c.1.2km east of the site. No signs of contamination on site. No groundwater source protection zones within this area. Watercourse is adjacent to the site. Development of the site is unlikely to require any direct discharge to the watercourse and if there was it would be under consent with the Environment	-	The entire site is PDL. It is currently vacant and unused. There are no signs of contamination on site. The nearest surface water feature is located c.200m south of the site. Should the use of this site change to incorporate a waste management facility, the site is likely to produce dust and noise, plus emissions of NO _x and CO ₂ to the air. Residential receptors are located nearby. It may be possible to minimise the impact on	0	The site is PDL which has been cleared and is vacant, located at the edge of an industrial sector of the Keighley urban area. There is some potential for contamination on site from former use. It is unlikely that the change in use of the site would result in a negative effect on soils. There are no groundwater source protection zones within this area. The River Aire is approx. 200m to the north

SA Objectives	Sites				
		<p>Agency. Any hardstanding would have oil interceptors in place.</p> <p>The use of this site for a waste management facility is likely to produce dust and noise, plus emissions of NO_x and CO₂ to the air. There is a residential area and school near to the site. It may be possible to minimise the impact on air quality through assessment and mitigation. Stack emissions would be controlled through environmental permitting under the Environmental Permitting (England and Wales) Regulations 2007.</p>		<p>air quality through assessment and mitigation. Stack emissions would be controlled through environmental permitting under the Environmental Permitting (England and Wales) Regulations 2007. The nearest AQMA is c.1.5km southeast of the site.</p>	<p>of the site on the other side of the A650. The road may act as a physical barrier, preventing any runoff from the site entering the River Aire.</p> <p>The site is large enough to accommodate the full range of waste management technologies. No residential receptors are located nearby. Should the use of this site change to incorporate a waste management facility, the site is likely to produce dust and noise, plus emissions of NO_x and CO₂ to the air. It may be possible to minimise the impact on air quality through assessment and mitigation. Stack emissions would be controlled through environmental permitting under the Environmental Permitting (England and Wales) Regulations 2007. There are no AQMA in Keighley.</p>
<p>SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.</p>	<p>+</p>	<p>The site is not designated for nature conservation, and there are no designated sites within 1km of the site. A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this site.</p>	<p>+</p>	<p>The site is not designated for nature conservation, and there are no designated sites within 1km of the site. A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this site.</p>	<p>-</p> <p>There are no nature conservation designations on the site but it is within 1km of two Bradford Wildlife sites, one to the south west and one north of the site.</p> <p>The plan has been strengthened to include the requirement for consideration of potential impacts on the wildlife sites (the SAP and/or SAC) through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required.</p>

SA Objectives	Sites				
					<p>A HRA screening assessment has now been undertaken and concludes that if waste to energy technologies are used on the site (incineration, gasification and/or pyrolysis) there could be a likely significant effect on a part of the South Pennine Moors SPA/SAC (locally called Rombald’s Moor). The findings suggest that although the addition of the emissions from a waste facility would be relatively small, acid deposition is already in excess of the critical load for this part of the South Pennine Moors SPA/SAC (Rombald’s Moor) and therefore a waste management use involving combustion processes on proposed Site WM3 of the Bradford Waste Management DPD would potentially exacerbate an existing situation.</p>
<p>SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.</p>	<p>+</p>	<p>The site is an urban, brownfield site, in proximity to a watercourse. There may be opportunity for biodiversity enhancement through development of the site. The plan has been strengthened to stipulate that, prior to development, the investigation and mitigation of potential for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets) should be undertaken.</p>	<p>+</p>	<p>There may be opportunity for biodiversity enhancement through development of the site. The plan has been strengthened to stipulate that, prior to development, the investigation and mitigation of potential for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets) should be undertaken.</p>	<p>0</p> <p>It is unlikely that the redevelopment of this site will contribute to the achievement of BAP targets, unless, through ecological assessment, it was identified that the site contains BAP resources which could be enhanced through the development.</p> <p>The plan has been strengthened to include the requirement for consideration of potential impacts on the river corridor (the SAP and/or SAC) through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an</p>

SA Objectives	Sites				
					assessment is required. No opportunity for enhancement of biodiversity has been identified; therefore a neutral impact is defined.
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	++	The site is within a primarily industrial area with some residential adjacent. Low visibility due to its position at the bottom of a valley.	+	The entire site is PDL and is currently being used for skip storage. No potential landscape and visual impact is noted as significant.	<p data-bbox="1576 427 1655 647">-</p> <p data-bbox="1576 647 1655 1070">?</p> <p data-bbox="1655 427 2163 1070">The site lies adjacent to a gas works (to the west) which is not considered to be a sensitive receptor. The site is cleared. The site is on low-lying ground and there are several areas of housing on higher ground to the south west (Thwaites Brow) and to the north (Riddlesden). Redevelopment for waste management use could therefore affect receptors to the north and south. Mitigation for visual and landscape impact is likely to be required. It may not be possible for all landscape and visual effects to be mitigated but the site and surrounding uses are currently of poor landscape quality. Visual and landscape improvements may be possible and should be sought.</p>
SA10: Encourage a modal shift away from road freight.	-	The site is approx. 2.5 km from a potential rail freight depot and therefore there is a potential that rail could be used to transport material to or from the site but it would be dependent on rail freight facilities being run by another party . It is considered unlikely that a significant shift to rail transport could be achieved, given the distance to potential rail freight facilities.	++	The eastern boundary of the site is formed by a railway line, and potential rail freight facilities are situated c.200m north of the site. Therefore, there could be potential for the use of rail freight.	++ The site has been identified as suitable for use as a rail freight depot. Therefore, there is potential for the use of rail freight.

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SA Objectives	Sites					
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.	++	The entire site is PDL. There are no Listed Buildings within 250m of the site.	+	The entire site is PDL and is currently being used for skip storage. The site has extant planning permission for an energy recovery facility. Albert Mill grade II Listed Building lies 250m from the site. The redevelopment of the site is not likely to harm the setting of this Listed Building and could improve the appearance of the site.	+	The site is greenfield but it lies within the Bradford urban area and there are no other cultural or heritage assets identified within the immediate area. Therefore, it could be seen to be positive against this objective There is a Listed Building c. 200m from the site but it is the other side of the A606 motorway.
SA12: Avoid, protect and enhance historic assets.	+	There are no sites of archaeological or cultural heritage importance within 500m of the site. The nearest site is a Conservation Area located c.800m north of the site.	+	There are no sites of archaeological or cultural heritage importance on the site. The nearest site is Bowling Park, a Historic Park and Garden, located approx. 300m east of the site.	+	There are no Listed Buildings within 250m. The site is cleared PDL and is within an industrial area with a gas works neighbouring the site to the west. The site is visually prominent, lying in a valley with higher receptors in the surrounding area. The redevelopment of the site for waste management could potentially negatively affect these receptors but there is also potential for redevelopment to improve the quality of the site from its current status.
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	-	There are no known cultural, leisure and recreation opportunities on the site. Directly to the north is a local cycle route and directly east is protected recreation open space which could potentially be affected by redevelopment of the site and this affect should be assessed.	0	The site is not designated open space and the redevelopment of the site will not affect any open space or protected leisure uses. Bowling Park, a Historic Park and Garden, is located approx. 300m east of the site.	0	The site is within the Bradford urban area and lies adjacent to industrial land and agricultural land to the west and the A606 motorway to the east. No sensitive receptors within the immediate vicinity have been identified. The development of the site will reduce the area of urban green space in which it is located, but given the surrounding uses, e.g. the

SA Objectives	Sites				
					motorway and industrial land, it is not considered that its redevelopment would result in a negative effect.

Summary	Conclusion (see key in Table 2.2)
<p>Site WM1: A number of minor negative effects are identified in relation to flooding air and noise quality. Environment Agency mapping indicates that a small amount of the site could be located within the flood zone. The site will have significant positive effects on landscape (due to its low visibility) and in relation to quality of the built environment and historic assets (no assets are nearby and current environment is largely industrial). Air quality, noise and landscape and visual assessment and mitigation would be required as there is a residential area and school close to the site. The effect on the rest of the SA objectives will be minor negative, minor positive or uncertain. A minor negative effect is identified because the site is adjacent to a protected recreation ground which could be affected by redevelopment.</p>	
<p>Site WM2: Will have no significant negative effects. A significant positive effect is identified because there is a railway and rail freight facility within 200m and therefore modal shift to rail transport could be possible. The effect on the rest of the SA objectives will be minor negative, minor positive, uncertain or neutral. There are no nature conservation or heritage designations in the site surrounds and the site is previously developed land. Residential land uses in the vicinity of the site could be affected by changes to noise and air quality. Air quality and noise should be assessed and mitigation measures put in place to minimize any adverse effects. Stack emissions would be controlled through environmental permitting under the Environmental Permitting (England and Wales) Regulations 2007.</p>	
<p>Site WM3: The site has one significant positive effect, which relates to the site’s suitability for freight transport. The rest of the effects are neutral, uncertain, minor negative or minor positive. The neutral and uncertain effects relate to the effect on Natura 2000 sites if incineration, pyrolysis or gasification is proposed; the fact that the site is near to two Bradford Wildlife Sites; and the fact that it is visually prominent, although the site and its immediate surroundings are currently of low landscape quality. A minor negative effect has also been recorded for cultural heritage. If incineration, pyrolysis or gasification went forward on the site a very tall stack is likely to be needed to mitigate effects on Natura 2000 sites. A very tall stack of this kind could have effects on a grade II* building near to the site.</p>	

Site Mitigation Measures
<p>All sites: Ensure appropriate ecological surveys are undertaken at planning application stage and any mitigation required aims to achieve the local BAP targets.</p> <p>Site WM1: Before site development takes place the following effects will need to be investigated and mitigated: flooding issues (as part of the site is located in Flood Zone 3), traffic effects (as there is no rail access to the site), air quality and noise (sensitive receptors nearby), effects on the local cycle route and protected recreation</p>

Site Mitigation Measures

area that are near to the site.

Site WM2: Before site development takes place the following effects will need to be investigated and mitigated: air quality and noise should be assessed and mitigation put in place as necessary due to residential receptors located nearby.

3.2 Matrix 2 – Sites WM4, WM5 and WM6

SA Objectives	Sites					
	Site WM4 (formerly Site 92)		Site WM5 (formerly Site 104)		Site WM6 (formerly Site 121)	
SA3: Reduce the District's impact on climate change and vulnerability to its effects.	+	The site is located on the east side of Bradford and there are no surface water features within 500m of the site, and therefore there is very low flood risk. The Environment Agency flood mapping does not show any flood risk to the site.	+	According to the Environment Agency flood maps, the site is outside of any areas at risk from flooding.	+	According to the Environment Agency flood maps, the site is outside of any areas at risk from flooding.
SA4: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.	0	The site is PDL. It is currently in use as a council depot and there is some potential for contamination on site. It is unlikely that the change in use of the site would result in a negative effect on soils. There are no groundwater source protection zones within this area, and there are no surface water features in close proximity to the site. The site is large enough to accommodate the full range of waste management technologies. There are no sensitive receptors nearby. Should the use of this site change to incorporate a waste management facility, the site is likely to produce dust and noise, plus emissions of NO _x and CO ₂ to the air. It may be possible to minimise the impact on air quality through assessment and mitigation. Stack emissions would be controlled through environmental permitting under the Environmental Permitting (England and Wales)	--	The site is Greenfield and therefore the development will result in the loss of soil resources. There are no known water features on site and no watercourses within the immediate vicinity of the site. There are no groundwater source protection zones in this area. The site is close to urban greenspace and therefore could have an effect on sensitive receptors (people using the greenspace). There is the potential for the site to increase the number of people affected by noise and dust.	0	The site is PDL. It is currently in private use for waste management. There is some potential for contamination on site. It is unlikely that the change in use of the site would result in a negative effect on soils. There are no groundwater source protection zones within this area, and there are no surface water features in close proximity to the site. The site is large enough to accommodate the full range of waste management technologies. The site is currently being used for waste management and therefore there may not be any changes in levels of noise and air quality impacts. These could require environmental impact assessment and mitigation to ensure that a change in the type of waste management activity would not result in any negative impacts on noise and air quality. Stack emissions would be controlled through environmental permitting under the Environmental

SA Objectives	Sites				
		Regulations 2007. The nearest AQMA is c.1km north-west of the site.			Permitting (England and Wales) Regulations 2007. The nearest AQMA is c.1km north-west of the site.
SA5: To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats.	-	<p>There are no nature conservation designations on or within 1km of the site.</p> <p>A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this site.</p>	?	<p>The site is not designated for nature conservation. There is a Bradford Wildlife Site located in close proximity to the site (approx. 200m) and mature trees are present in the site. The condition and value of these trees is unknown. This and potential effects on the wildlife site would need to be assessed in more detail to understand the risk of habitat loss, should the trees be lost to development and the risk of effects on the wildlife site.</p> <p>A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from the redevelopment of this site.</p>	<p>?</p> <p>There are no nature conservation designations on or within 1km of the site.</p> <p>The site is currently in use for waste management. There are structures on site which would need to be cleared if the site were to be redeveloped for other waste management uses. It is unknown whether these structures might be suitable for bat roosts. Ecological assessment may be required in order to ascertain the ecological value of the site, potential impact from redevelopment and any mitigation measures required.</p> <p>A HRA screening assessment has now been undertaken and concludes that there are no likely significant effects from this site.</p>
SA6: Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.	-	<p>It is unlikely that the redevelopment of this site will contribute to the achievement of BAP targets, unless, through ecological assessment, it was identified that the site contains BAP resources which could be enhanced through the development.</p>	-	<p>There are mature trees present on the site. The condition and value of these trees is unknown. This would need to be assessed in more detail to understand the risk of biodiversity loss, should the trees be lost to development.</p>	<p>-</p> <p>It is unlikely that the redevelopment of this site will contribute to the achievement of BAP targets, unless, through ecological assessment, it was identified that the site contains BAP resources which could be enhanced through the development.</p>
	?	<p>It may have a negative effect if pipistrelle bats are found to be roosting in the existing buildings on site, and if these will require demolition, a full bat survey should be carried out prior to</p>	?		<p>?</p> <p>It may have a negative effect if pipistrelle bats are found to be roosting in the existing buildings on site, and if these will require demolition, a full bat survey should be carried out prior to</p>

SA Objectives	Sites					
		their demolition.			their demolition.	
SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.	+	The site is within an urban environment and currently in use as a council depot. It is considered unlikely that the redevelopment of the site would result in a landscape impact. Some mitigation for visual impact may be required for localised receptors.	0	Landscape and visual constraints to the east have been identified. The site is near to green belt and urban greenspace. However, the policy has been strengthened through the requirement for visual and landscape assessments to be carried out, and visual improvements to be sought, prior to its redevelopment. Therefore, the site is likely to have a neutral effect.	+	This site is currently used for waste management and is situated within the Bowling industrial area. There are no sensitive receptors identified within the immediate vicinity of the site. It is considered unlikely that the redevelopment of the site would result in a landscape impact. Some mitigation for visual impact may be required for localised receptors.
SA10: Encourage a modal shift away from road freight.	-	There is a railway line within close proximity to the site and a potential rail freight depot within approx. 1.5 km. There could be potential for the site to use rail transport but the potential is unknown and it could be dependent on rail freight facilities being run by another party. It is considered unlikely that a significant shift to rail transport could be achieved, given the distance to potential rail freight facilities.	-	The site could potentially make use of a potential rail freight depot which is approx. 2.5 km away and therefore there is a potential that rail could be used to transport material to or from the site but it would be dependent on rail freight facilities being run by another party. ¹ It is considered unlikely that a significant shift to rail transport could be achieved, given the distance to potential rail freight facilities.	++	There is a railway line within close proximity to the site and a working railway siding within the site. Therefore, there is the potential for use of rail freight
SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient	0	There are two Listed Buildings c.500m west of the site. The redevelopment of the site may adversely affect the quality of the surrounding built environment but the plan states that <u>effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built</u>	-	This site works against the achievement of this objective because it is Greenfield land and therefore its development does not represent efficient use of land. No other constraints have been identified within 250m.	0	There is one Listed Building c.500m west of the site. The redevelopment of the site may adversely affect the quality of the surrounding built environment but the plan states that effects on the Listed Building west of the site, and the effect on the quality of the surrounding built

SA Objectives	Sites					
use of land.		<u>environment should be assessed and mitigation put in place. Therefore, the effect is likely to be neutral.</u>				environment should be assessed and mitigation put in place. Therefore, the effect is likely to be neutral..
SA12: Avoid, protect and enhance historic assets.	+	There are no sites of archaeological or cultural heritage importance on or within 500m of the site.	+	There are no sites of archaeological or cultural heritage importance or within 500m of the site.	+	There are no sites of archaeological or cultural heritage importance on or within 500m of the site.
SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities	+	The site is not designated open space, however, a protected playing fields is situated c. 300m south of the site. A local cycle route runs along the southern site boundary.	+	No constraints although site is next to urban greenspace.	+	There are no constraints identified.

Summary	Conclusion
<p>Site WM4: The site has no significant negative or significant positive effects. Minor negative effects are identified because the distance to potential rail freight facilities is unlikely to encourage a significant shift to rail transport, there is a risk of bats being present in existing structures on site and there are two listed buildings c500m from the site. However, it is likely that the potential negative effects associated with bats and Listed Buildings can be mitigated if, through assessment, potential negative effects are identified. The rest of the effects are neutral, uncertain or minor positive.</p>	
<p>Site WM5: The site is Greenfield and therefore the development will result in the loss of soil resources. The development of the site could also result in air and noise effects. There are mature trees present on the site. The condition and value of these trees is unknown. This would need to be assessed in more detail to understand the risk of habitat loss, should the trees be lost to development. There is also a Bradford Wildlife site in close proximity to the site. Ecological assessment and mitigation measures would be required in order to ensure that the site is not negatively affected by the development of the site. Given the distance to potential rail freight facilities, it is unlikely that a significant shift to rail transport could be achieved.</p>	
<p>Site WM6: The site has no significant negative effects. A significant positive effect is recorded in relation to modal shift. There is a railway line within close proximity to the site and a working railway siding within the site. Minor negative effects are identified because there is a risk of bats being present in existing structures on site and there are two listed buildings c500m from the site. However, it is likely that the potential negative effects associated with bats and Listed Buildings can be mitigated if, through assessment, potential negative effects are identified. The rest of the effects are neutral, uncertain or minor positive. The rest of the effects are neutral, uncertain or minor positive.</p>	
Site Mitigation Measures	
<p>All sites: Ensure appropriate ecological surveys are undertaken at planning application stage and any mitigation required aims to achieve the local BAP targets. Site WM5: Air quality and noise assessment and appropriate mitigation will be required in order to ensure there are no negative effects on sensitive receptors.</p>	