

# Local Development Framework for Bradford

## Waste Management DPD Issues and Options

November 2009



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Waste Management DPD:  
Issues & Options Paper

**November 2009**

This document is one of a number that make up the Local Development Framework for the Bradford District. If you need the contents of this document to be interpreted or translated into one of the community languages or you require it in Braille, Large Print or on tape, please contact the Local Development Framework Group on (01274) 434050, (01274) 434544 or (01274) 434606

यह दस्तावेज़ उन बहुत से दस्तावेज़ों में से एक है जिनसे मिलकर ब्रैडफोर्ड डिस्ट्रिक्ट का लोकल डिवेलपमेंट फ्रेमवर्क बनता है। यदि आप इस दस्तावेज़ की जानकारी का हिन्दी अनुवाद या इसे ब्रेल, बड़े अक्षरों या टेप पर प्राप्त करना चाहते हैं, तो कृपया लोकल डिवेलपमेंट फ्रेमवर्क ग्रुप से (01274) 434050, (01274) 434544 या (01274) 434606 पर सम्पर्क करें।

ਇਹ ਦਸਤਾਵੇਜ਼ ਅਜਿਹੇ ਬਹੁਤ ਸਾਰੇ ਦਸਤਾਵੇਜ਼ਾਂ ਵਿਚੋਂ ਇਕ ਹੈ ਜਿਨ੍ਹਾਂ ਨਾਲ ਬਰੈਡਫੋਰਡ ਡਿਸਟ੍ਰਿਕਟ ਦਾ ਲੋਕਲ ਡਿਵੈਲਪਮੈਂਟ ਫਰੇਮਵਰਕ ਬਣਦਾ ਹੈ। ਜੇਕਰ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਵਿਚ ਦਿੱਤੀ ਗਈ ਜਾਣਕਾਰੀ ਦਾ ਪੰਜਾਬੀ ਅਨੁਵਾਦ ਜਾਂ ਇਸਨੂੰ ਬ੍ਰੇਲ, ਵੱਡੇ ਅੱਖਰਾਂ ਜਾਂ ਟੇਪ 'ਤੇ ਪ੍ਰਾਪਤ ਕਰਨਾ ਚਾਹੁੰਦੇ ਹੋ ਤਾਂ, ਕ੍ਰਿਪਾ ਕਰਕੇ ਲੋਕਲ ਡਿਵੈਲਪਮੈਂਟ ਫਰੇਮਵਰਕ ਗਰੁੱਪ ਨਾਲ (01274) 434050, (01274) 434544 ਜਾਂ (01274) 434606 'ਤੇ ਸੰਪਰਕ ਕਰੋ।

ब्राडफोर्ड डिस्ट्रिक्ट (Bradford District) এর লোক্যাল ডেভেলপমেন্ট ফ্রেইমওয়ার্ক (Local Development Framework – স্থানীয় উন্নয়ন কাঠামো) এর অনেকগুলো কাগজপত্র বা দলিলপত্রের একটি হলো এই তথ্যপত্রটি। এই তথ্যপত্রের বিষয়বস্তু কমিউনিটির লোকদের কোনো ভাষায় বুঝতে চাইলে অথবা লিখিত অনুবাদ চাইলে নতুবা তা ব্রেইলে (অক্ষলিপিতে), মোটা হরফে কিংবা ক্যাসেটে রেকর্ড করে চাইলে, অনুগ্রহ করে লোক্যাল ডেভেলপমেন্ট ফ্রেইমওয়ার্ক গ্রুপ (Local Development Framework Group)-কে (01274) 434050, (01274) 434544 বা (01274) 434606 নাম্বারে ফোন করুন।

ਆ ਦਸਤਾਵੇਜ਼ ਥਾਂ-ਥਾਂ ਨੂੰ ਖੋਲ੍ਹ ਕੇ ਜੇ ਡਿਸਟ੍ਰਿਕਟ ਨਾਂ ਸਥਾਨਿਕ ਵਿਕਾਸ ਨੀ ਰੂਪਰੇਖਾ ਅਨਾਵੇ ਚੇ। ਜੇ ਤਮਨੇ ਆ ਦਸਤਾਵੇਜ਼ਾਂ ਲਖਾਝਾਨੂੰ ਪ੍ਰਾਟੋਟਿਪ ਆਖਓਮਾਂ ਆਖੰਤਰ ਕਰਾਵਾਨੀ ਅਥਵਾ ਤੇਨੋ ਅਰਥ ਸਮਝਵਾਨੀ ਜੜ੍ਹ ਜਝਾਯ, ਅਥਵਾ ਤਮਨੇ ਤੇਨੀ ਜੜ੍ਹ ਖੋਲ੍ਹ, ਆਰਜ਼ ਪ੍ਰਿੰਟ ਕੇ ਪਈ ਟੇਪ ਉਪਰ ਚੋਯ, ਤੋ ਮਠੇਰਆਨੀ ਕਰੀ ਲੋਕਲ ਡਿਵੇਲਪਮੈਂਟ ਫ਼ੇਮਵਰਕ ਗ੍ਰੁਪਨੋ (01274) 434050, (01274) 434544 ਅਥਵਾ (01274) 434606 ਪਰ ਸੰਪਰਕ ਕਰੋ।

یہ دستاویز بریڈفورڈ ڈسٹرکٹ کے مقامی ترقیاتی لائحہ عمل سے متعلقہ دستاویزات میں سے ایک ہے۔ اگر آپ کو اس دستاویز کا زبانی یا تحریری ترجمہ کسی بھی کمیونٹی زبان میں درکار ہو یا آپ اسے بریل، لارج پرنٹ یا ٹیپ میں چاہتے ہیں تو براہ مہربانی لوکل ڈیولپمنٹ فریم ورک گروپ سے ٹیلی فون نمبر: 01274 434050, 01274 434544 یا 01274 434606 پر رابطہ کریں۔

## Summary Form

### SCOPE OF THE CONSULTATION

<b>Topic of this consultation:</b>	The present and future issues facing waste management in Bradford District and the options available to potential resolution of these issues over the next 15 years.
<b>Scope of this consultation:</b>	The purpose of this consultation is to seek views from the general public and relevant stakeholders on whether they agree with the issues facing the district and the options set out to rectify them. Comment on other issues and alternative options are also welcomed.
<b>Geographical scope:</b>	The consultation applies to Bradford District, but stakeholders views are welcomed from national and international quarters.

### BASIC INFORMATION

<b>To:</b>	This consultation is principally addressed to members of the public, community groups, the waste industry and those professionally and personally associated or involved in waste management in the Bradford District.
<b>Body responsible for the consultation:</b>	City of Bradford Metropolitan District Council  LDF Group, Planning Service, Department of Regeneration  The Waste Management DPD: Issues and Options was approved for public consultation by the Council's Executive Committee on 20 <sup>th</sup> October 2009.
<b>Duration:</b>	9th November 2009 to 25 <sup>th</sup> January 2009
<b>Enquiries:</b>	Website: <a href="http://www.bradford.gov.uk/ldf">www.bradford.gov.uk/ldf</a>  Email: <a href="mailto:ldf.consultations@bradford.gov.uk">ldf.consultations@bradford.gov.uk</a>  Telephone: 01274 434296  LDF Group 8 <sup>th</sup> Floor Jacobs Well Manchester Road Bradford BD1 5RW

<b>How to respond:</b>	To the addresses above (preferably by email if possible)
<b>Additional ways to become involved:</b>	The Council will be running a Topic Work Shop on the 9 <sup>th</sup> December for members of the waste industry and another for community and local action groups. This is a focused workshop specifically for those with an interest in waste management.
<b>After the consultation:</b>	We shall take into account the response to this consultation before any final decisions are taken on clarifying the preferred options for the next stage of the Waste Management DPD. We would expect to publish a Preferred Options Report approximately 6 – 9 months post consultation of the Issues and Options.
<b>Compliance with the code of practice on consultation:</b>	The consultation complies with Regulation 25 and 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.

## BACKGROUND

<b>How to respond:</b>	To the addresses above (preferably by email if possible)
<b>Additional ways to become involved:</b>	The Council will be running a Topic Work Shop on the 8 <sup>th</sup> December for members of the waste industry and community and local action groups. This is a focused workshop specifically for those with a vested interest in waste management within the Bradford District.
<b>After the consultation:</b>	The Council shall take into account the response to this consultation before any final decisions are taken on clarifying the preferred options for the next stage of the Waste Management DPD. The Council would expect to publish a Preferred Options Report approximately 6 – 9 months post consultation of the Issues and Options.
<b>Compliance with the code of practice on consultation:</b>	The consultation complies with Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004.

## SUPPORT

<b>Seeking independent advice and support:</b>	Planning Aid provides free, independent and professional advice on planning issues to community groups and individuals who cannot afford to pay a planning consultant. Yorkshire Planning Aid also provides a programme of community planning, training and education activities.
<b>Contact:</b>	Email: <a href="mailto:ykco@planningaid.rtpi.org.uk">ykco@planningaid.rtpi.org.uk</a>  Telephone: 0870 850 9808  Yorkshire Planning Aid The Studio 32 The Calls Leeds LS2 7EW

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**APPENDIX 1: SUSTAINABILITY APPRAISAL OBJECTIVES**

**APPENDIX 2: LONG LIST OF POTENTIAL WASTE MANAGEMENT FACILITY SITES**

# 1. INTRODUCTION

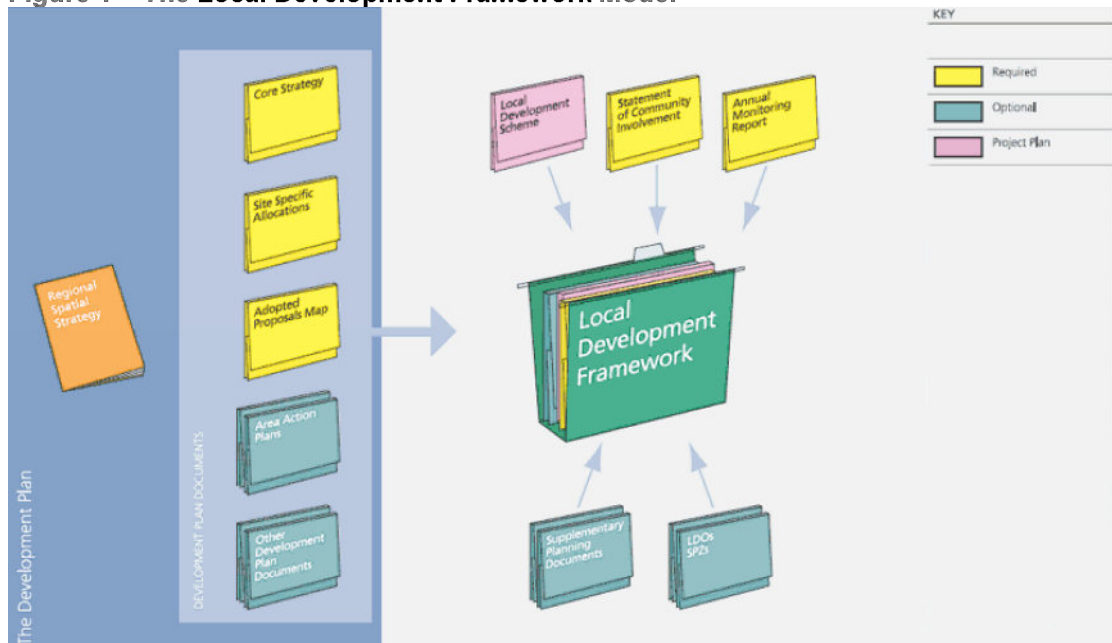
## BACKGROUND

- 1.1 City of Bradford Metropolitan District Council (CBMDC) has traditionally, like a number of other Councils, exported a significant proportion of its waste to landfill sites as the primary method of waste disposal including a heavy reliance on landfill located in other authority areas. There is currently very limited infrastructure in place to accommodate a change in this reliance on landfill in other locations, although it is noted that this is changing including emerging planning applications and the Waste Private Finance Initiative (PFI) within the District in partnership with Calderdale.
- 1.2 The Council faces two key challenges relating to waste over the Local Development Framework (LDF) period, driven by European, UK and regional planning policy guidance and regulations. Firstly there is a need to diversify from landfill to promote more sustainable methods of waste management (which should promote waste as a resource in the first instance), and secondly there is a need for waste planning areas (in this case the District) to deal with their own waste arisings and not rely on exporting waste. Bradford must look to ensure sufficient land and infrastructure as part of the LDF to accommodate waste arisings and therefore waste management requirements within its own boundaries.
- 1.3 This must be promoted alongside the need to increase reuse/recycling levels, and maximise the levels of energy generated from waste, and therefore reduce waste to landfill. Targets have been set nationally, regionally, and locally to this end which must be met to ensure sustainability of the environment, prevent cost to the Council, and/or avoidance of loss of funding.
- 1.4 This Waste Management Development Plan Document (DPD) will build on the strategic policy guidance relating to waste management within European and national guidance, the Regional Spatial Strategy (RSS) and the LDF Core Strategy. It will be an important tool in ensuring that the Council has sufficient and appropriate provision within the LDF to deliver this aspiration for self-sustainability in waste management over the next 15 years.

## THE WASTE MANAGEMENT DPD

- 1.5 Figure 1 below illustrates the elements which comprise a LDF. Within the Planning and Compulsory Purchase Act (2004), LDF's were established as new the new statutory planning policy process for local authorities to set the spatial visions for their areas and to guide development. Individual DPD's form elements of the portfolio of documents which together comprise the LDF, as illustrated in Figure 1.

**Figure 1 – The Local Development Framework Model**



- 1.6 The Waste Management DPD is an important stage for CBMDC in formulating a strategic response to the challenges of accommodating waste arisings over the LDF period. This includes the need to plan for Municipal Solid Waste (MSW), Commercial and Industrial waste, Construction and Demolition, and Hazardous and Agricultural waste arisings.
- 1.7 The Council is required to produce a detailed plan which outlines its strategy for the effective management of waste arisings generated within the District over the plan period including consideration of:
- Mechanisms for identifying land suitable for waste management facilities in the District over the plan period, including identification of sufficient land relative to forecast waste arisings;
  - Policies and guidance to be used by the Council when determining planning applications for waste management-related developments; and



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- The role of the Council in the wider sub-region in relation to waste management (where appropriate).
- 1.8 This Waste Management Issues & Options document is the first stage in engaging with waste matters for the preparation of the Waste Management DPD for CBMDC. It forms part of the Regulation 25 Pre-Submission consultation and engagement process. When adopted the Waste Management DPD will form part of the Council's LDF.
- 1.9 The Waste Management DPD must comply with the policies within the emerging Core Strategy, which establishes the strategic vision, objectives and overall strategy for Bradford, as well as broad policies to guide and control development across the District. The Waste Management DPD must also conform to the RSS for Yorkshire and the Humber, national planning policy, and European legislation.

## COMMUNITY AND STAKEHOLDER INVOLVEMENT

- 1.10 The Council have previously consulted on waste management issues as part of Core Strategy Topic Paper 8 *Waste* and the Waste Management Core Strategy Further Issues & Options. The objectives of this Waste Management DPD consultation, alongside promoting awareness of this issue, were to establish the strategic priorities for waste management across the District, and ensure an appropriate spatial strategy as a starting point for identifying appropriate sites for waste management purposes.
- 1.11 To date, the following documents have been prepared specifically by the Council relating to waste management:
- Topic Paper 8 *Waste* – February 2007; and
  - Waste Management Core Strategy Further Issues and Options Paper – October 2008.
- 1.12 The findings of the previous consultations have been used to inform the emerging Waste Management Core Strategy Preferred Option, as well as this Waste Management DPD Issues & Options. The key messages are outlined overleaf. For full details of all the comments made within previous consultation please see the summary of consultation findings online at [www.bradford.gov.uk/ldf](http://www.bradford.gov.uk/ldf).

Key messages from the consultations undertaken relating to waste management as part of the Core Strategy include:

- Opportunities for co-locating complementary activities such as waste and Combined Heat and Power (CHP) should be explored.
- Local Planning Authorities (LPA's) should work together with their neighbouring authorities to ensure a coherent and consistent approach to waste in their LDF's.
- Both new and existing sites should be considered for the expansion and location of new waste management facilities.
- More consideration should be given to European legislation, especially in relation to targets for recycling, composting and diversion of waste from landfills.
- Further guidance relating to agricultural and hazardous waste should be provided in the Core Strategy.
- Waste management sites should be located within 1km of the major or strategic road network, rather than 'existing' roads as stated in the Waste Core Strategy Further Issues and Options document.
- Sites within the Green Belt should not be excluded from providing waste management sites and the Green Belt should not be considered as an environmental sensitive area.

1.13 The Waste Management DPD Issues and Options paper will be consulted on during autumn 2009. Following this consultation, a Waste Management DPD Preferred Option will be developed, to be consulted on between January and March 2010. It is envisaged that the Waste Management DPD will be adopted in early 2011.

1.14 The Council will prepare an Engagement Plan setting out the process for consultation in line with the Statement of Community Involvement. As part of the consultation the following people will be consulted directly, with the document published for wider comment on the Council's website:

- Consultees identified in the Council's Statement of Community Involvement;
- Those who responded to earlier consultation and engagement on waste management issues; and

- Any other individuals who have requested to remain informed / involved in the preparation of the LDF and associated documents, including this DPD.
- 1.15 This Issues & Options document sets out the key issues and options available for waste management within Bradford District. The document establishes a series of waste related issues relating to the amount, location, and handling of waste arisings now in the District, and the objectives for the future, including the need for cross-boundary working. The document leads on to a consideration of the approaches that the District could take in relation to different waste arisings. A series of alternative options are proposed that could be further developed as this Waste Management DPD is prepared.
- 1.16 Throughout the document, we have set out questions based on the issues and options for you to consider. We need to understand your views on the issues raised and the alternative options proposed (including if you think we have omitted something of importance).
- 1.17 Please respond to the questions posed within this Waste Management DPD Issues & Options paper by writing to the following address:
- Bradford Local Development Framework Group  
**FREEPOST NEA11445**  
PO BOX 1068  
BRADFORD,  
BD1 1BR
- email:** [ldf.consultation@bradford.gov.uk](mailto:ldf.consultation@bradford.gov.uk)  
**Fax:** 01274 433767
- 1.18 All consultation responses must be received by 25<sup>th</sup> January 2010 in order to be included in the formulation of the Waste Management DPD Preferred Option. If you wish to be informed of later stages of preparing this document or be notified of consultation on future LDF documents please make us aware in your response and you will be added to the mailing list.

## **SITE NOMINATIONS**

- 1.19 In the Waste Management Core Strategy: Further Issues & Options consultation (October 2008), the Council made a call for sites for consideration of waste management facilities over the LDF plan period. Site nominations made during this process have been included in the Waste Management DPD process to date.
- 1.20 This Waste Management DPD Issues & Options paper is a further opportunity to put forward any sites that were not nominated in the Waste Management Core Strategy: Further Issues and Options process.

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- 1.21 This can include site nominations from the waste industry, landowners, and other interested parties to be considered as potential waste management sites. Site nominations should be made by 25<sup>th</sup> January 2010. The list of all sites identified through this process will be made public.

## CROSS-BOUNDARY CONSIDERATIONS

- 1.22 In line with guidance from Government Office and good practice, we have given consideration to cross-boundary issues relating to waste management within the Waste Management DPD Issues & Options paper. There are a number of key considerations in relation to cross-boundary waste management issues, including:
- The opportunity and appropriateness of joint-boundary planning for waste management facilities; and
  - The potential location of waste management facilities in proximity to administrative boundaries, with potential impacts arising in adjacent authority areas.
- 1.23 We have undertaken consultation with adjacent authority areas, (Leeds, Calderdale, Kirklees, North Yorkshire, and Lancashire County Council) and Wakefield MDC (as one of the main destinations of waste exported from Bradford at the current time) as part of the development of this Waste Management DPD.
- 1.24 As part of this consultation it was established that given differing timescales within Local Development Schemes (LDS) across the various authority areas, formal joint-working on waste management matters is not possible, certainly not on a West Yorkshire basis. Bradford Council is however undertaking a joint-PFI process to identify a preferred waste management provider agreement relating specifically to Municipal Solid Waste (MSW) with Calderdale Council at the current time.
- 1.25 Whilst joint-working may not be wholly possible it will be important to ensure a proper / robust understanding of waste management within other authority areas. Continued information sharing between the LPA's is an important component of this approach over the plan period to ensure consistency for review and monitoring purposes.
- 1.26 The need to promote joint working as part of the planning process (including specifically that relating to waste management) between LPA's in the region was recognised as significant throughout the consultations. For CBMDC greater collaborative and joint working will help ensure that a robust cross-boundary approach to waste issues is developed during the plan

period. This approach could include the following activities serving as delivery mechanisms for the Core Strategy and Waste Management DPD:

- Information sharing relating to key waste data indicators, their analysis and interpretation;
- Collaborative working on emerging waste DPD's and their reviews;
- Commenting on waste related planning applications; and
- The commissioning of joint reviews, data updates and specific waste related studies.

**Question 1:**

**How should CBMDC work jointly with neighbouring local authorities and those where the District currently exports its waste?**

**Actions could include:**

- Information sharing relating to key waste data indicators, their analysis and interpretation;
- Collaborative working on emerging waste DPD's and their reviews;
- Commenting on waste related planning applications; and
- The commissioning of joint reviews, data updates and specific waste related studies.

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## 2. WASTE ARISING AND MANAGEMENT

### WASTE ARISING IN BRADFORD

2.1 In 2007 (the latest data available) the total amount of waste produced (known as waste arisings) in the District is estimated to have been at least 852,489 tonnes excluding Construction Demolition and Excavation Waste<sup>1</sup>. This rises to a best estimate of 1,424,003 tonnes when all waste types are included:

- Agricultural waste: waste arising from a farm or market garden, including organic matter such as manure, slurry, silage effluent and crop residues, but also packaging and films, and animal treatment dips;
- Commercial waste: waste arising from wholesalers, catering establishments, shops and offices (in both the public and private sector). This also includes municipal waste collected by commercial waste agencies;
- Construction and demolition waste: waste arising from the construction, repair, maintenance and demolition of buildings and structures. For this waste type it is important to note that the original figures from the RSS have been used as they are likely to portray a more accurate reflection of waste arising of this type due to certain exclusions within the waste data interrogator figures for C&D waste;
- Hazardous waste: defined in European Law as those wastes included within the European Waste Catalogue because they possess one or more of the hazardous properties set out in the Hazardous Waste Directive. Waste data figures for hazardous waste type is taken from the Hazardous Waste Interrogator 2007;
- Industrial waste: waste arising from factories and industrial plants; and
- Municipal waste: includes household waste and other waste collected by the Council as waste collection authority.

2.2 Figures 2 and 3 outline the waste arisings within the District in 2007. They illustrate large contributions to the total waste arisings across the District from Municipal Solid Waste and Commercial and Industrial, together accounting for over 56% of total estimated waste arisings. Construction, Demolition & Excavation waste is also likely to produce large

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<sup>1</sup> Data taken from Waste Data Interrogator 2007 produced by the Environment Agency

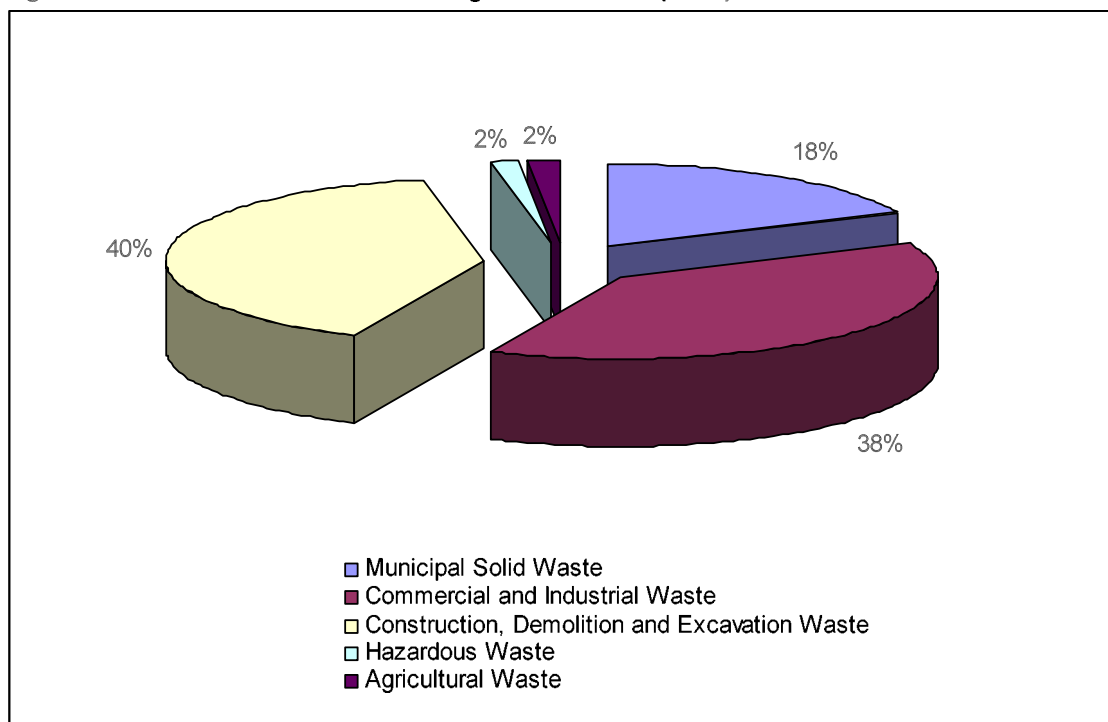
contributions to total waste arisings although these figures are only estimates from regional data.

**Figure 2: Summary of Waste Arisings in Bradford (2007)**

Type of Waste Arising	Arisings (tonnes)
Municipal Solid Waste (CBMDC only)	261,065
Commercial and Industrial Waste	547,131
Construction, Demolition and Excavation Waste <sup>2</sup>	571,514
Hazardous Waste	21,821
Agricultural Waste <sup>3</sup>	22,472
TOTAL	1,424,003

Source: Waste and Hazardous Waste Data Interrogator, 2007, Environment Agency

**Figure 3: Breakdown of Waste Arisings in Bradford (2007)**



Source: Waste and Hazardous Waste Data Interrogator set, 2007, Environment Agency

<sup>2</sup> NB: Robust data is not available at the time of writing specific to Bradford. In order to generate a figure for Construction, Demolition and Excavation Waste arisings for Bradford the Yorkshire and Humber total has been divided by 21 (the number of UA / District areas within the region) as an average. It is noted that in the context of Bradford relative to the other administrative areas across the region that this figure is likely to be a low estimate.

<sup>3</sup> NB: Data on Agricultural Waste arisings across Bradford is believed to be a low estimate based on some data being excluded or counted as commercial and industrial waste due to licensing of premises additionally the Environment Agency does not count most of this type of waste. Agricultural waste arisings excludes manure or straw. Manure and slurry when spread at the place of production, for the benefit of agriculture, is not considered waste.

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- 2.3 A number of factors influence waste arisings, including population growth, economic growth, and development activity linked to both. These are anticipated to have an impact on waste arisings in Bradford District over the plan period.
- 2.4 The RSS sets out the following increases in waste arisings in the period to 2021 as stated within RSS:
- By 2021, 316,000 tonnes of municipal solid waste will need to be managed across Bradford;
  - By 2021, 649,000 tonnes of commercial and industrial waste will need to be managed across Bradford; and
  - Whilst forecasts for construction and demolition waste are not available to 2021 for Bradford it is assumed that these will increase significantly given development aspirations across the District in the long term.
- 2.5 Based on current understanding it is assumed that hazardous waste arisings will not increase significantly over the plan period and available agricultural waste figures are too unreliable to assume any change by 2021.

## **CURRENT WASTE MANAGEMENT IN BRADFORD**

- 2.6 The waste arisings within the District are managed in a variety of ways, depending on the type of waste and, perhaps more significantly in the local context, the availability of suitable waste management facilities.
- 2.7 Exporting waste arisings to landfill outside of the District remains the primary waste management method utilised by CBMDC for Municipal Solid Waste, a situation which needs to be reversed (both in terms of reliance on exporting, and landfill as a waste management solution). The main destinations of exported municipal solid waste at the current time is Wakefield and Skipton.
- 2.8 Figure 4 summarises the waste management methods currently utilised across the District for all types of site category, recorded by the Environment Agency. As with the previous waste data this data may not provide a realistic figure relating to Construction, Demolition & Excavation or Agricultural waste.



**Figure 4: Bradford Proportion of Deposits by Type (2007)**

Site Category	Total	%
<b>Treatment</b>	<b>29,763</b>	<b>3.3</b>
<b>Landfill</b>	<b>36,149</b>	<b>4.1</b>
<b>MRS</b>	<b>111,843</b>	<b>12.6</b>
<b>Transfer</b>	<b>711,263</b>	<b>80.0</b>
<b>Land Disposal</b>	<b>0</b>	<b>0.0</b>
Total	889,019	100.0

Source: Waste and Hazardous Waste Data Interrogator, 2007, Environment Agency

2.9 Within the District there are a number of waste management facilities, including:

- Landfill sites;
- Civic amenity / household waste recycling centres;
- Waste transfer sites;
- Metal recycling sites;
- Storage sites; and
- Treatment sites.

2.10 In total there were 61 such facilities across the District in 2007. These are broken down by site category in Figure 5.

**Figure 5: Number of Operational Waste Management Facilities in Bradford (2007)**

Type of Waste Management Facility	Number of Facilities
<b>Landfill</b>	<b>2</b>
<b>MRS</b>	<b>21</b>
<b>Treatment</b>	<b>4</b>
<b>Transfer</b>	<b>34</b>
TOTAL	61 facilities

Source: Waste Date Interrogator, 2007, Environment Agency

2.11 Figure 6 provides an outline capacity for each of the facility types across the District in tonnes. This data is taken from the previous RATS Data set (2005), prepared by the Environment Agency, which represents the best available data currently available and will be subject to further update and analysis during the preparation of the Waste Management DPD.

**Figure 6: Capacity of Operational Waste Management Facilities in Bradford (2005)**

Type of Waste Management Facility	Capacity of Facilities (tonnes)
<b>Landfill</b>	
Inert	944,260
<b>Non Hazardous</b>	<b>1,089,356</b>
<b>Restricted</b>	<b>165,000</b>
<b>Transfer</b>	
<b>Civic Amenity/Household Waste Recycling Sites</b>	<b>81,997</b>
<b>Waste Transfer</b>	<b>1,005,678</b>
<b>Metal Recycling Sites</b>	
<b>Car Breaker</b>	<b>102,149</b>
<b>Metal Recycling</b>	<b>1,161,800</b>
<b>Storage</b>	
<b>In-House Storage</b>	<b>2,500</b>
<b>Pet Crematorium</b>	<b>75</b>
<b>Treatment</b>	
<b>Chemical Treatment</b>	<b>250</b>
<b>Physical-Chemical Treatment</b>	<b>80,914</b>
TOTAL (including Waste Transfer)	4,633,979
TOTAL (excluding Waste Transfer)	1,347,688

Source: RATS Data set, 2005, Environment Agency

2.12 Figure 7 summarises recycling and composting activity across Bradford, as of 2005, by tonnage and percentage by type of activity determined from data from the Environment Agency. Figure 7a represents figures for 2007/8 collected from within Bradford Council. The data indicates that there has been an overall increase in the recycling and composting of household waste in the Bradford district and in particular an increase in composting.

**Figure 7: Bradford Levels of household Recycling and Composting Activity (2005)**

Recycling and Composting Activity	Tonnes	Percentage
<b>TOTAL Tonnes Recycled and Composted</b>	<b>39,852</b>	<b>100%</b>
<b>Total recyclable</b>	<b>22,500</b>	<b>56.5%</b>
Total recyclable collected at Kerbside	10,312	26%
Total recyclable brought to 'Bring' sites	3,244	8%
Total Civic Amenity/HWRS(less composted waste )	8,984	22.5%
<b>Total composted waste</b>	<b>17,312</b>	<b>43%</b>
Civic Amenity/HWRS composting	13,996	35%
Total composted waste collected at Kerbside	1,792	4.5%
Composting other	1,524	4%

Source: RATS Data set, 2005, Environment Agency

**Figure 7a: Bradford Levels of household Recycling and Composting Activity (2007/8)**

Recycling and Composting Activity	Tonnes	Percentage
<b>TOTAL Tonnes Recycled and Composted</b>	<b>43,904</b>	<b>100%</b>
<b>Total recyclable</b>	<b>20,140</b>	<b>46%</b>
Total recyclable collected at Kerbside	6,163	14%
Total recyclable brought to 'Bring' sites	3,303	8%
Total Civic Amenity/HWRS(less composted waste )	6,508	15%
Inert waste recycled	4,166	9%
<b>Total composted waste</b>	<b>23,764</b>	<b>54%</b>
Civic Amenity/HWRS composting	17,283	39%
Total composted waste collected at Kerbside	5,191	12%
Composting other	1,290	3%

Source: Bradford MDC Environment & Neighbourhoods

## MOVEMENTS IN AND OUT OF BRADFORD DISTRICT

- 2.13 Data relating to total movements in and out of the District suggest a significant net export of waste. Specifically, according to waste data interrogator, (obtained from the Environment Agency, in 2007 a total of 358,539 tonnes of waste was exported from the District, with a total of 245,436 tonnes imported – a net balance of -113,103 tonnes<sup>4</sup>. This suggests a significant reliance on waste management facilities in other locations.
- 2.14 This is reflected in the fact that there are 34 waste transfer stations in the District, the highest number of any one type of waste management facility. This position is changing in the context of planning permissions granted, new planning applications, and the PFI investment to come forwards within the District.
- 2.15 Figure 8 summarises the export of total waste, to various management facilities, outside of Bradford District, in 2007.

<sup>4</sup> This does not include figures for Construction, Demolition and Excavation Waste

**Figure 8: Key Destinations of Waste Exported by Bradford (Tonnes) (2007)**

Site Category	Landfill	MRS	Transfer	Treatment	Total
Lincolnshire		1033			1033
Kirklees			2130.12		2130.12
Barnsley		240	5175.87		5415.87
Sheffield		5998.4	1019.44	57.3	7075.14
York UA		5.76	8273.64		8279.4
Flintshire UA			9634		9634
Calderdale		782	13168.51		13950.51
Middlesbrough			16243.12	6.39	16249.51
Craven			53086		53086
Leeds		2568.73	59409.31	9.02	61987.06
Liverpool		74373.32	119.91		74493.23
Wakefield		228.8	155300.4		155529.2
Yorks & Humber	9936.9	3201.82	172252	9063.25	194453.9
Not Codeable		2257.56	24499.51		26757.07
Total from All Districts	9936.9	111335.2	719191.3	9301.99	849765.4

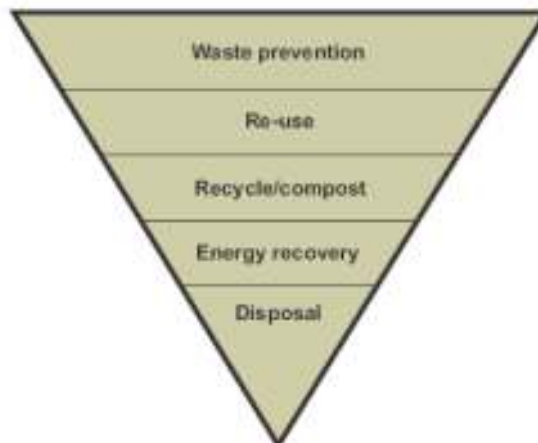
Source: Waste Data Interrogator, 2007, Environment Agency (Inc. Construction Demolition and Excavation Waste)

### 3. WASTE PLANNING OBJECTIVES FOR THE WASTE MANAGEMENT DPD

#### THE LEGISLATIVE FRAMEWORK

- 3.1 The policy direction for waste management is set out from the European, through to national, regional, and local level in various Directives, Planning Policy Statements, and spatial strategies.
- 3.2 The European Community's Waste Framework Directive (2008) (Directive 2008/98/EC of the European Parliament and of the Council) states that the first objective of any waste policy should be to minimise the negative effects of the generation and management of waste on human health and the environment. It further states that waste policy should also aim at reducing the use of resources, and favour the practical application of the waste hierarchy.

**Figure 9: The Waste Hierarchy**



- 3.3 The 'waste hierarchy' (Figure 9), which underpins national and regional policy guidance relating to waste management across the UK, establishes the prioritisation of waste prevention, but emphasises the need to take all available opportunities for re-use, recycling / composting, and energy recovery of those wastes which cannot be eliminated before final disposal is considered.

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## NATIONAL WASTE PLANNING OBJECTIVES

- 3.4 National waste management and waste planning aspirations have been developed in the context of various European Directives and legislation which promote the need for increasing self-sufficiency including enabling waste to be disposed of in the nearest appropriate installation to promote environmental sustainability.

### Delivering Sustainable Development

- 3.5 Planning Policy Statement 1: Delivering Sustainable Development (PPS1) sets in place the strategic planning policy objectives for the delivery of sustainable development. It is stated within PPS1 that planning policy at all levels should promote sustainable and inclusive patterns of urban and rural development by:

- Making suitable land available for development in line with economic, social and environmental objectives to improve peoples quality of life;
- Contributing to sustainable economic development;
- Protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- Ensuring high quality development through good and inclusive design, and the efficient use of resources; and
- Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

### National Waste Strategy 2007

- 3.6 The key objectives for waste management as stated within the 2007 National Waste Strategy are to:
- Separate waste growth (in all sectors) from economic growth and put more emphasis on waste prevention and re-use;
  - Meet and exceed the Landfill Directive targets for reducing the amount of biodegradable municipal waste in 2010, 2013, and 2020;
  - Divert more non-municipal waste from landfill sites and secure better integration of treatment for municipal and non-municipal waste;

- 
- Secure the investment in infrastructure needed to divert waste from landfill and manage hazardous waste; and
  - Get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste using a mix of technologies.
- 3.7 The Strategy also sets out a number of targets relating to the aspiration to reduce greenhouse gas emissions, household residual waste, increasing household waste recycling and composting (at least 40% by 2010 and 50% by 2020), municipal waste recovery (75% by 2020) and reducing the land filling of commercial and industrial wastes.

### Planning Policy Statement 10: Planning for Sustainable Waste Management

- 3.8 The importance of positive planning for the delivery of sustainable waste management is recognised and promoted within Planning Policy Statement 10 (PPS10). The document sets out the Government's key overarching policies and principles which apply to waste management, applying the principles of sustainable development.
- 3.9 PPS10 reflects the Government's aspiration to remove the direct link between economic growth (and household growth) and waste generation, putting more emphasis on waste prevention and re-use. A waste hierarchy has been established which prioritises waste prevention, but which also emphasises the need to take all available opportunities for re-use, recycling / composting and energy recovery or those wastes which cannot be eliminated before final disposal is considered.
- 3.10 Further to this strategic guidance, PPS10 requires that sites and/or areas that may be suitable for new or enhanced waste management facilities must be identified within DPD's to support the pattern of waste management facilities and waste apportionments set out in the Regional Spatial Strategy (RSS).
- 3.11 It sets out general principles for the allocation of sites or areas, with a focus on providing opportunities for the management of waste where it arises and the need to consider a broad range of locations including industrial sites, looking for opportunities to co-locate facilities together or with complementary activities.
- 3.12 In testing the suitability of sites and areas for waste management facilities, DPDs should apply the following criteria:
- The extent to which the use of the site for waste management supports the policies in PPS10;

- 
- The physical and environmental constraints on development including existing and proposed neighbouring land uses;
  - The cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion, or economic potential; and
  - The capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from the resource recovery, seeking where practicable and beneficial to use modes other than road transport.

## REGIONAL WASTE PLANNING OBJECTIVES

### Regional Spatial Strategy (RSS)

- 3.13 The RSS for Yorkshire and Humber adopted in May 2008, contains specific policies relating to waste management. It recognises that while significant progress has been made in terms of MSW recycling rates, Yorkshire and Humber remains one of the worst performing regions in terms of recycling and recovery, a situation which it considers to be unacceptable.
- 3.14 In this context, the RSS stresses the importance of adopting strategies across the region to avoid waste production, recover value from waste that is produced, and only dispose of the residual proportion that has no value. The need to accelerate the rate of investment in new waste facilities and initiatives, specifically relating to MSW arisings, is particularly emphasised.
- 3.15 Policy ENV14 of the RSS sets out the strategic location requirements for waste management facilities and emphasises that waste should be managed on the site where it arises, or if not possible, at the nearest appropriate location. The RSS sets out the following priority areas for the identification of sites for waste management facilities:
- Established and proposed industrial sites which have the potential for the location of waste management facilities and the co-location of complementary activities, such as “resource recovery” or “sustainable growth” parks.
  - Previously developed land including mineral extraction and landfill sites during their period of operation for the location of related waste treatment activities in sustainable locations.
  - Redundant farm buildings and their curtilages.



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## Regional Waste Strategy

3.16 The Regional Waste Strategy (2003) sets out four key objectives for Yorkshire and Humber, including the need to:

- Gain community support and involvement in the delivery of the strategy;
- Reduce waste production and increase re-use, recycling and composting;
- Manage residual waste in a sustainable way; and
- Provide technical support and advice.

## BRADFORD DISTRICT OBJECTIVES IN RELATION TO WASTE

### Emerging LDF Core Strategy

3.17 The emerging Core Strategy vision for waste management within the District was consulted on within the first Core Strategy Waste Management Issues and Options paper (Topic Paper 8, Waste, February 2007). This vision is stated below. The Core Strategy will provide direction for the scale, type and strategic location of development and investment across Bradford District.

*Bradford needs to take responsibility for the waste it generates, undertaking a step change in the way it manages its waste, through more sustainable waste management, moving the management of waste up the waste hierarchy of: reduction, re-use, recycling and composting; using waste as a source of energy and only disposing of waste as a last resort. We should look to be self-sufficient in managing the waste we generate, locating facilities for the management of waste as close as possible to its place of production.*

### Bradford Municipal Waste Management Strategy

3.18 The overall aims of the Municipal Waste Management Strategy (MWMS) (2005) are “to focus on the waste management issues facing the Council to 2020, determine what actions need to be considered to address the issues, and assess how this will influence the procurement of the long term waste treatment and disposal services for the Council’s municipal wastes”. The Business Case for the Bradford and Calderdale joint waste Private Finance Initiative (outlined in paragraph 3.21) is effectively an update of the Bradford Municipal Waste Management Strategy (2005).

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3.19 The MWMS and PFI Business case seek to:

- Elevate waste management activities up the waste hierarchy to more sustainable levels;
- Achieve self-sufficiency and manage waste in accordance with the proximity principle;
- Contribute to the achievement of corporate priorities;
- Achieve local and national targets;
- Improve public awareness of waste and environmental issues;
- Link to other strategic Council documents; and
- Provide value for money.

3.20 In the long term the MWMS identifies the need to commence procurement of a preferred waste contractor by the end of 2005. It states that the contract will need to have the following characteristics:

- A start date of 2010 to 2015 at the latest;
- Will deal with all of the Council's Municipal Waste;
- Have a contract period of at 25 years duration: the contract period should match the design life of any new facility;
- Will also define the ends but not the means: it will not specify waste technology solutions, but will be based upon an output based specification which will meet specified targets in WS2000 and EU Landfill Directive, yet minimising disposal to landfill in compliance with LATS;
- Allow for flexibility, ranging from a single plant, to which the Council delivers waste, through to the contractor operating other waste related services, such as HWRC, refuse collection, trade waste collection, and residual waste disposal to landfill;
- Place as much risk as is reasonable and cost effective to do so onto the contractor;
- Suggest that such an output based specification, and scope and risk allocation will require a design, build, finance and operate contractual solution. The funding vehicle will therefore be one which suits a DBFO contract, typically either PFI or PPP, and will in turn dictate the type of procurement undertaken;
- Allow for the development of a contractual solution including neighbouring Councils, where beneficial for Bradford to do so, and

- 
- Adhere to the proximity principle, and the Council will need to make land in its ownership within the District available upon which to construct new facilities, but this should not prevent consideration of regional / sub-regional facilities which could be outside of the District, particularly where any bidder has strength nearby.

### Bradford-Calderdale Joint Waste Management Private Finance Initiative

- 3.21 CBMDC is, collaboratively with Calderdale Council, currently in the process of procuring a partner to deliver and run a waste treatment solution for municipal waste arisings in Bradford and Calderdale through a Private Finance Initiative (PFI). It is intended that the preferred bidder will be selected in June 2010, with the contract awarded in October 2010. The Council have secured £62.1 million of PFI funding to this end.
- 3.22 In going to the market with this opportunity, CBMDC selected a hybrid option of Mechanical-Biological Treatment, in-vessel composting, and thermal treatment as its Reference Project, on the basis that it has the potential to:
- Achieve landfill diversion targets in full, regardless of the availability and security of markets for output products;
  - Contribute significantly to recycling, composting and recovery targets;
  - Be flexible with regard to waste composition and volumes;
  - Be located on a site owned by CBMDC;
  - Have moderate rather than high planning risk; and
  - Be bankable.
- 3.23 As part of the process CBMDC has not selected a preferred technology and has gone to the market with an open view on the technology solution.
- 3.24 Four companies have been short listed for the for the 25-year PFI contract, reduced from 16 expressions on interest. The Council, along with Calderdale Council, are now in 'competitive dialogue' with the remaining companies to review their proposals in more detail.

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## Waste Document Sustainability Appraisal

- 3.25 The first stage of the sustainability appraisal of the Bradford Waste Development Plan Document commenced in 2007 with the preparation of the Scoping Report. The Report collected together the baseline data and information on other plans, policies and programmes that can have an influence on the production of the Bradford Waste DPD. Based on this context, sustainability appraisal objectives and indicators were identified and issues set out to form a draft framework, which will then be used to measure the performance of the plan. The Sustainability Appraisal (SA) also incorporates the requirements of the Strategic Environmental Assessment (SEA).
- 3.26 The Council invited comments on the Draft Scoping Report in August 2007. Following a review of the comments received it was deemed necessary to make some small amendments to ensure that the SA of the Waste DPD is consistent with the SA of the Core Strategy, as well as taking on board the more specific comments received. Consultation on the amended scoping report took place between December 2008 and January 2009.
- 3.27 A Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) will be undertaken following the consultation period of this Waste Management DPD Issues & Options paper in advance of the preparation of the DPD Preferred Option.
- 3.28 This SA will measure the performance of the options against the criteria established within the Waste DPD SA Scoping Report, published by the Council in August 2007. However, it will also draw on baseline data included in the Core Strategy SA Scoping Report (February 2002, *Local Development Framework Sustainability Appraisal Draft Scoping Report*), supplemented by data within the Waste Management DPD SA Scoping Report. The Core Strategy SA Scoping Report gathers together a large amount of generic data about the District which will be used to guide all sustainability appraisals within the District. The Waste Management DPD Sustainability Appraisal is supplementary to the Core Strategy SA and is more focused on waste management matters relevant to the DPD.
- 3.29 Appendix 1 sets out the Sustainability Appraisal objectives in the Core Strategy Scoping Report as well as those in the Waste Management DPD SA Scoping Report (consulted on during January 2009).

## 4. FUTURE WASTE MANAGEMENT REQUIREMENTS

### Objectives for Waste Management

4.1 Through the detailed review of policy aspirations and legislation a number of objectives for waste management for Bradford have been identified, summarised in the box below.

- To be more self-sufficient in managing our own waste through maximising opportunities for waste reduction and increasing the amounts of waste we re-use, recycle, compost and recover meeting regional and national targets over the period to 2026;
- To minimise the amount of residual waste sent on to landfill sites within and outside Bradford District. We need to make greater efforts to deal with our own waste within the District;
- To ensure that expanded and new waste developments support the planned growth and waste needs of the Bradford community; and
- To work in collaboration with neighbouring local authorities and waste industry operators to ensure that sub-regional waste issues are effectively considered and planned for, recognising that each local authority will seek to manage its own waste more effectively in the plan period where this is the most suitable option.

#### **Question 2:**

**Are there any local circumstances which would lead us to depart from these objectives, if so what are they and what should the objectives be?**

## Forecast Future Waste Arisings

- 4.2 Previous to this section, the waste arisings figures have been taken from the waste data interrogator obtained from the Environment Agency, however, forecasts of waste arisings set out below are taken from the Yorkshire and Humber Regional Assembly data presented in the RSS (Proposed Changes 2007), supplemented by forecasts of waste arisings obtained from research undertaken by Enviros Consulting Limited on behalf of Government Office for Yorkshire and Humber in 2007 (*Waste Arisings Forecast*).
- 4.3 Figure 10 provides an indication of how waste arisings are predicted to change during the lifetime of the Core Strategy and Waste DPD to 2021.

**Figure 10: Forecasts for Waste Arisings in Bradford (2007 – 2021)**

Type of Waste	Waste Arisings (tonnes per annum)			
	2007	2010	2015	2021
Municipal Solid Waste	261,065	277,000	294,000	316,000
Commercial & Industrial	547,131	628,000	638,000	649,000
Construction & Demolition	571,514	576,774	589,267	609,041
Hazardous	21,821	21,821	21,821	21,821
Total	1,401,531	1,503,595	1,543,088	1,595,862

*\*Forecasts for Construction and Demolition waste are not available from RSS at District level. Regional growth trends have been applied to the 2007 waste arisings to forecast future requirements. Agricultural waste is excluded as there are currently no reliable or available figures*

- 4.4 There is forecasted growth in each individual type of waste arising in Bradford District, with the exception of Hazardous waste (in line with regional figures). Overall however, the growth in total waste arisings is just 4%.
- 4.5 Given the current trend within Bradford to export the majority of waste arisings outside of the District, coupled with new challenges for recycling, composting, and recovery of energy from waste there is currently a need for new waste infrastructure within Bradford.
- 4.6 It should be noted that there are extant planning permissions for waste management facilities within Bradford, and the PFI programme will deliver investment in capacity for dealing with future MSW arisings. The ongoing changes will therefore require regular monitoring and managing to ensure the correct levels of waste infrastructure are provided for Bradford.

**Question 3:**

**Do we need to allocate sites for all categories of waste or do we just need to allocate sites for MSW and C&I waste?**

**Question 4:**

**Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW & C&I waste) categories of waste?**

**Question 5:**

**Are these realistic levels of waste to be planned for within the DPD or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?**

**Question 6:**

**Through the DPD the Council can include planning approaches which assist in reducing waste arisings such as promoting the on-site reuse or recycling of waste and how waste is processed for example.**

**Are there other approaches to minimising waste arisings that the Council should promote in the DPD?**

## **THE NEED FOR NEW WASTE MANAGEMENT FACILITIES IN BRADFORD DISTRICT**

- 4.7 There is a shortage of waste management facilities in the District at the current time. This is borne out in the analysis of the level of waste currently exported and the actual capacity for waste management within Bradford District. Both extant planning permissions for new waste facilities, future applications, and the PFI programme will result in improvements to this waste management infrastructure across the District.
- 4.8 Each type of waste is considered in turn.

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## Municipal Solid Waste

- 4.9 Current MSW waste arisings in Bradford total 261,065 tonnes per annum (2007 data). By 2021 this type of waste arising is forecast to grow to 316,000 tonnes per annum:
- By 2021 a minimum of 158,000 tonnes of MSW is required to be recycled;
  - By 2021 a minimum of 237,000 tonnes of MSW treatment capacity is required across Bradford; and
  - On the basis that 158,000 tonnes of MSW is required to be recycled and 237,000 tonnes of MSW treatment capacity is required there will only be a minimal requirement for landfill for MSW.
- 4.10 Existing incidences of recycling and composting in Bradford stand at around 21% of total MSW generated, for 2007/08. Significant change is needed and the provision of infrastructure to meet the minimum need for an additional 158,000 tonnes MSW is required. There is a significant improvement in re-use, recycling and composting to be delivered through the PFI and the Waste Management DPD.

## Industrial and Commercial Waste

- 4.11 Current industrial and commercial waste arisings in Bradford stand at 547,131 tonnes per annum (2007 data). By 2021 it is forecast that this will have increased to 649,000 tonnes per annum:
- By 2021, 435,000 tonnes per annum of treatment capacity will be required for commercial and industrial waste will be required in Bradford;
  - The National Waste Strategy (2007) sets a target to landfill 33% of commercial and industrial waste, which by 2021 will equate to 214,170 tonnes; and
  - Recovery capacity has been estimated at 78,000 tonnes per annum meaning further capacity would be needed for 357,000 tonnes of Commercial and Industrial waste.



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## Construction and Demolition Waste

- 4.12 By 2021, it is forecast that 609,041 tonnes of construction and demolition waste arisings will need to be managed within Bradford.

**Question 7:**

**Are there any local circumstances that would lead us differ from the national and regional policy aspiration to maximise the recycling and re-use of waste?**

## Hazardous Waste

- 4.13 Data obtained from the Government Office Yorkshire and Humber suggests that deposits of hazardous waste in West Yorkshire broadly equate to waste arisings. Current hazardous waste arisings in Bradford (based on 2007 figures) are estimated to be 21,821 tonnes per annum, by 2021 it is forecast that this will not increase.
- 4.14 The RSS identifies that in the short term there is generally adequate landfill capacity across West Yorkshire for hazardous waste but there may be a need for new capacity to replace existing facilities, particularly in this sub-region before 2021. Bradford will be expected to contribute to the new capacity over the plan period.

## Agricultural and 'Other' Types of Waste

- 4.15 Legislation established in 2006 requires agricultural waste to be managed on or off-site subject to licensing as well as for exemptions relating to on-site treatment and re-use.

**Question 8:**

**Should criteria based policies be considered for the provision of waste management facilities for agricultural and 'other' types of waste arising rather than site specific?**

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## 5. POLICIES FOR WASTE MANAGEMENT – ISSUES AND OPTIONS

### INTRODUCTION

- 5.1 This section sets out the issues and options relating to waste management as the basis for the policy framework within the Waste Management DPD and through future site allocations. This builds on the previous issues and options presented during the development of the Waste Management element of the Core Strategy.
- 5.2 It is important that we get your views on the DPD issues and options presented within this section, and other comments you may have on the DPD, to allow us to take these into account when preparing the Preferred Option.

### ISSUE 1: INTERNAL WASTE MANAGEMENT

#### OVERVIEW OF ISSUE

- 5.3 European legislation as well as national and regional policy all establish the need for Bradford to do much more to deal with its own waste arisings rather than relying on landfill and the export of waste outside of the District. The Core Strategy establishes a series of objectives for waste management, including the need to be more self-sufficient in managing waste and in minimising the amount of residual waste sent to landfill sites within and outside the District.
- 5.4 Previous consultation on waste management issues undertaken through the Core Strategy has shown strong support for the District to move towards self-sufficiency through the minimisation of waste generation and reductions in the environmental impact of waste by promoting appropriate planning policies.
- 5.5 The current reliance on landfill and the District's under-performance in recycling have been consistently identified as issues requiring a new planning policy approach to be adopted.
- 5.6 It is recognised that some movement of waste will continue into and out of the District, however CBMDC cannot rely on these movements and must ensure sufficient capacity to deal with waste of all types within their own boundary over the plan period, unless it is

demonstrated otherwise that continuing to export Bradford's waste is the only valid or realistic solution.

- 5.7 This includes a consideration of ensuring waste treatment as close to source as possible, in line with Government guidance. It is recognised that the response will be relative to the nature and scale of waste arisings. For example, existing facilities and/or planned facilities in adjacent districts may prove to be the best opportunity to treat waste as closely as possible to source.

## WHAT ARE THE OPTIONS?

- 5.8 Five strategic options are set out for the overall provision of waste handling facilities. It is important to establish from the outset not just how waste will be managed but also how the Waste Management DPD can ensure waste minimisation appropriate to Bradford's local circumstances.
- 5.9 The options set out have been developed to reflect national and regional policy guidance as well as the findings of consultation on handling waste in the District from the Core Strategy. The options presented allow consideration of various approaches that could be taken to the provision of waste facilities and the minimisation of waste production, including different approaches to provision within and outside the District.

**Issue 1 Option 1: Focus on consolidating and increasing capacity at existing facilities across the District, and recognise that some waste will need to be managed outside Bradford.**

**Issue 1 Option 2: Provide additional sites and capacity to manage growing waste arisings within the District.**

**Issue 1 Option 3: Provide additional sites and capacity to manage more waste than is produced in the District, allowing scope to import and handle waste from other places in the future?**

**Issue 1 Option 4: Work with adjacent authorities to identify appropriate sites / facilities to accommodate waste arisings as closely as possible to their source?**

**Issue 1 Option 5: Minimise waste production / arisings across the District through appropriate planning policies, therefore minimising site allocations required.**

**Question 9**

**Which option or combination of options for Issue 1 are the most appropriate and why?**

**Question 10**

**Assuming Option 2 and/or 3 are preferential, what type of facilities should be provided.**

**Question 11**

**What other options should be considered?**

## **ISSUE 2: LOCATION OF WASTE SITES**

### **OVERVIEW OF ISSUE**

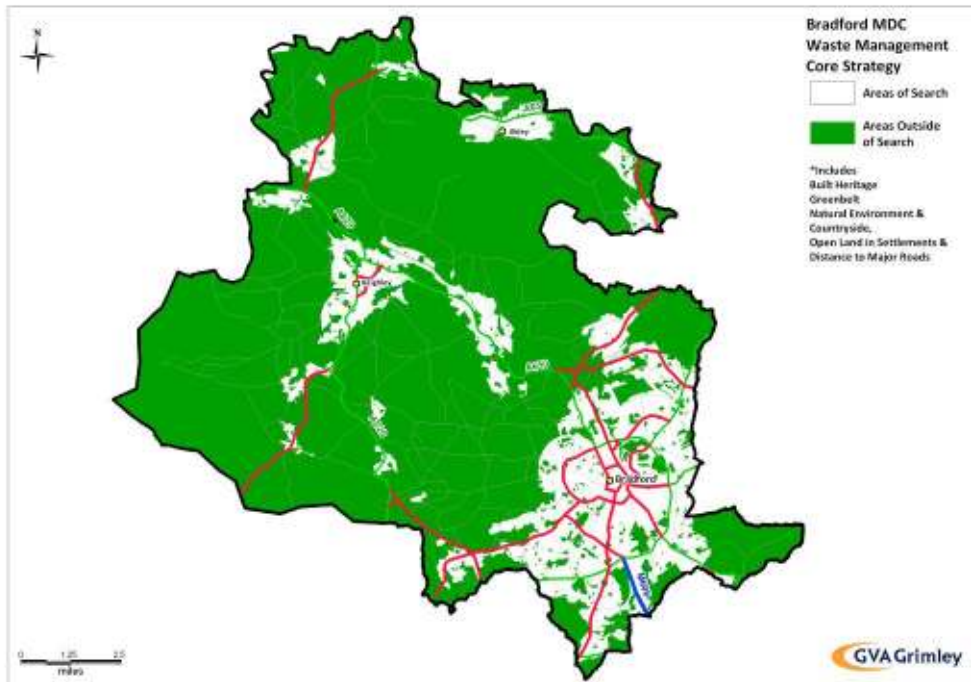
5.10 A positive and proactive approach to the identification of locations for new or expanded waste sites has been adopted which accords with national and regional policy guidance and reflects consultation findings from the Core Strategy Issues and Options on Waste Management. The Waste Management Core Strategy Preferred Option establishes the principles of identifying appropriate locations for waste management facilities and identified a broad 'Area of Search' for locating new and expanded waste sites across the District. The area of search was based on a detailed consideration of a range of factors including:

- Alignment to policy;
- Physical constraints to site development;
- Distance from the strategic and major road network;
- Proximity to waste arisings;
- Adjacent uses;
- Potential visual intrusion; and
- Ground stability.

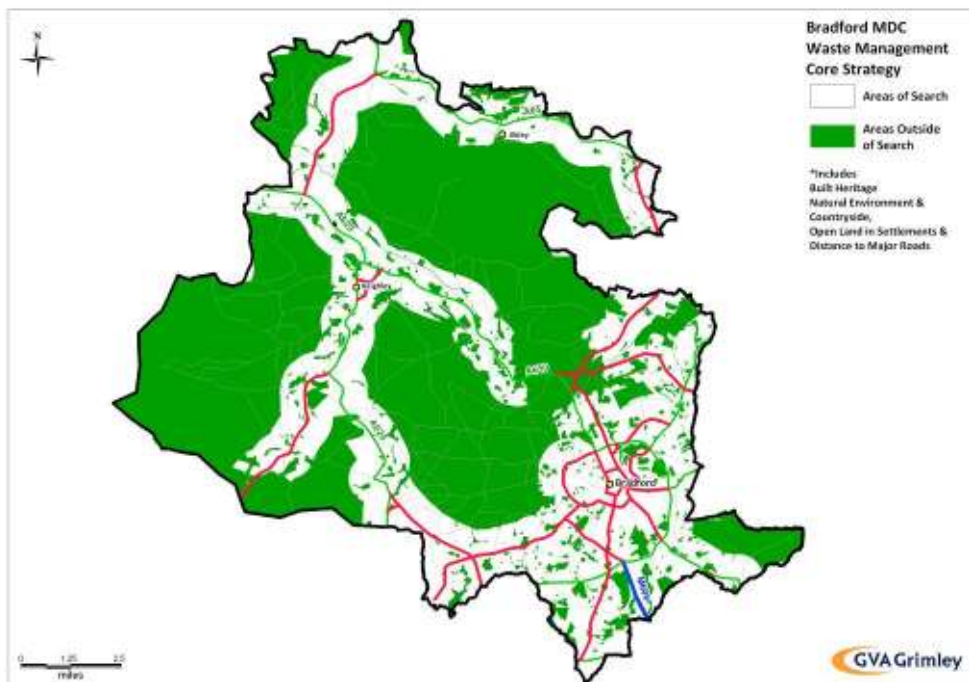
5.11 Two different areas of search were identified in the Waste Management Core Strategy Preferred Option; the first taking the Green Belt as a location constraint, while the second excluding the Green Belt as a constraint. This reflects national policy guidance which

indicates that sites in the Green Belt should only be considered where there are insufficient suitable and deliverable alternative locations. These two areas of search are identified in Figures 11 and 12 overleaf.

**Figure 11: Identified Area of Search (including Green Belt as a Constraint)**



**Figure 12 - Identified Area of Search (excluding Green Belt as a Constraint)**



- 5.12 Whilst the location of waste management facilities may be influenced by drivers outside of the control of CBMDC (such as sources and types of waste, market forces and the deliverability of particular sites or locations, for example), it is appropriate for the Waste Management DPD to consider how sites should be distributed, and where they may be located in the context of known constraints and opportunities.

## WHAT ARE THE OPTIONS?

- 5.13 Two alternative options have been identified for the location of waste sites which reflect either a concentration of waste management facilities in a small number of strategic sites, or alternatively a larger number of small sites that are more dispersed across the District. The options presented here reflect the geography of the areas of search and of waste arisings in Bradford.
- 5.14 The options also draw on the consultation findings from the Core Strategy Waste Management Further Issues and Options process, which identified that the number of large and small sites to be identified should be maximised to provide flexibility and choice to waste operators.
- 5.15 The consultation findings also indicated that opportunities for co-locating complementary activities and working collaboratively with neighbouring authorities in considering the location of new waste management facilities were important.

**Issue 2 Option 1: Concentrate waste management facilities in a small number of strategic sites.**

**Issue 2 Option 2: Identify a large number of small sites dispersed across the District for waste management purposes.**

**Question 12: Which option for Issue 2 is the most appropriate and why?**

**Question 13: Should different approaches be applied to different waste streams?**

**Question 14: Are there any other options that should be considered for Issue 2?**

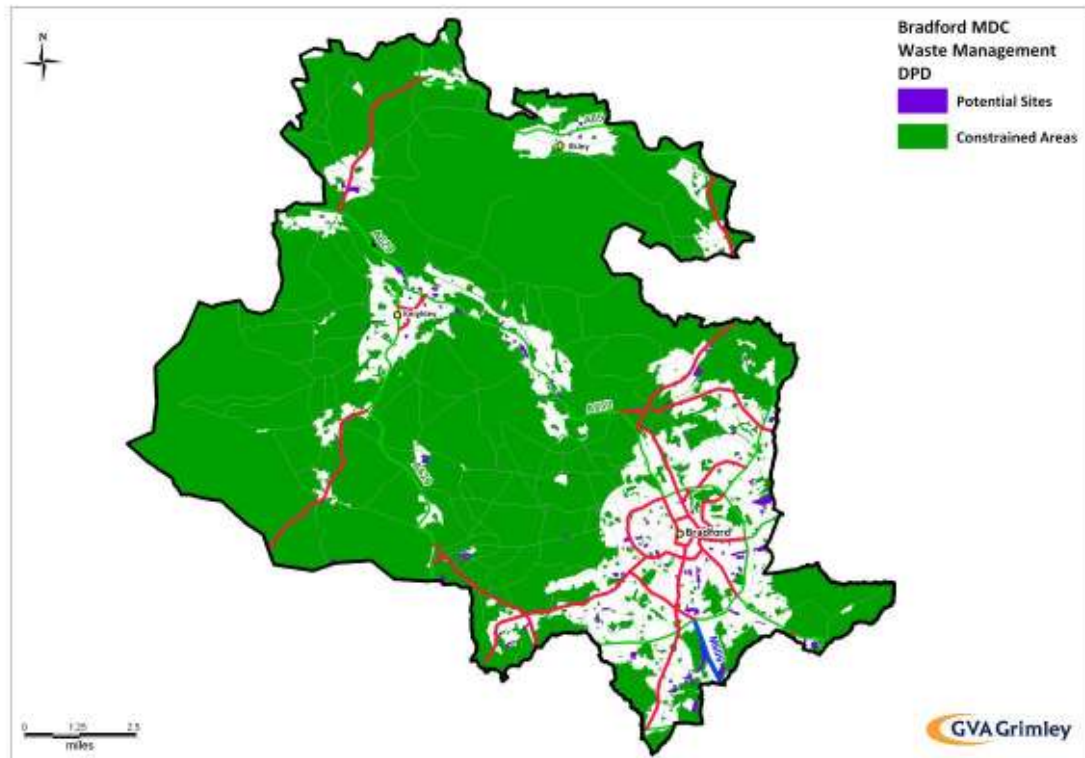
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## ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES

### OVERVIEW OF ISSUE

- 5.16 In order to provide a suitable policy basis for new or expanded waste management facilities, the Waste Management DPD needs to identify site specific options for the location of facilities, focused on sites that meet the area of search criteria, and have developable land available in the plan period.
- 5.17 A long list of sites in the District has been identified within the area of search. An initial review of potential waste sites has been made, with the removal of sites that have no development land potential remaining. At this stage no sites within the Green Belt have been included within the review in accordance with national policy guidance. Sites within the Green Belt will be reviewed in the event that an insufficient number of sites are identified as suitable in the area of search not within the Green Belt.
- 5.18 Initial sites (within the area of search) include:
- Existing waste management facilities;
  - Allocated employment land;
  - Council depots including current waste facilities;
  - Civic amenity sites;
  - Exhausted mineral workings; and
  - White (un-designated or allocated) land.
- 5.19 Figure 13 illustrates the distribution of potential sites identified within the area of search (a full list is provided in Appendix 2 including site size, source and comments). Sites without development potential (in terms of available land in the plan period) have been removed from this initial long list of potential sites. Existing waste sites within the Green Belt are included within the long-list of potential sites as are sites which did not meet the minimum site size of 0.5 ha.



**Figure 13: Potential Waste Sites for Further Testing**

## WHAT ARE THE OPTIONS?

- 5.20 Two options have been identified that set out the approach to the identification of potential waste management facility sites in the District. The options consider the reasonable alternatives of excluding potential sites that are located in the Green Belt on the basis of the area of search criteria, or of including sites within the Green Belt now on the basis of ensuring that all potential sites are consistently assessed.

**Issue 3 Option 1: Test all sites on the initial long list within the area of search, excluding those in the Green Belt other than existing facilities.**

**Issue 3 Option 2: Test all sites on the initial long list, including new potential sites in the Green Belt.**



**Question 15:**

**Which option is the most appropriate and why? Are there any other alternative options?**

## **ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE & COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES**

### **OVERVIEW OF ISSUE**

- 5.21 Different types of waste management facilities have different site location criteria due to the nature and scale of their processes and operations and the common types of technology used to handle waste.
- 5.22 A range of location criteria for MSW and Commercial and Industrial Waste have been developed to take account of potential environmental and amenity impacts. Impacts are categorised to reflect the following;
- **Air Pollution** - A number of facilities generate air pollution including dust and other emissions which in extreme cases may be toxic and as such may be better suited away from residential areas.
  - **Noise Pollution** - Some facilities that utilise heavy machinery can be quite noisy and as such may be better sited in industrial areas.
  - **Water Pollution** – there are examples of some facilities where outputs includes leachates which can pollute local water courses if allowed to and as such these should be sited away from water courses or areas likely to flood, and major aquifers.
  - **Proximity to Waste Arisings** – In order to ensure maximum environmental benefits some facilities require to be closer to waste arisings than others. These sites tend to be higher energy consumers and frequent long journeys would negate any environmental benefit.
  - **Proximity to Other Facilities** – Some facilities require close proximity to others to fully maximise benefits. For example anaerobic digestion facilities produce residue which subsequently require composting facilities.

- Requires Buffer to Residential Areas – A number of facilities create the above pollutants to the extent that there are statutory requirements to site the facilities away from residential areas.
- Siting waste facilities should also take into account a number of additional criteria including design standards and local traffic noting that all facilities have a visual intrusion and cause increased road use.

5.23 Figure 14 sets out a matrix of proposed site location impact criteria that have been developed. The attributes of the long list of potential waste sites will be tested against these location criteria as the Waste Management DPD is developed.

**Figure 14: Waste Management Facilities: Site Location Impact Criteria**

Facility Characteristic Criteria	Min Site Size Required (Ha)	Creates Air Pollution	Creates Noise Pollution	Creates Water Pollution	Requires Proximity to Waste Arisings for Sustainability	Requires Proximity to Other Facilities	Requires Buffer to Residential Areas
<b>Mechanical Biological Treatment</b>	0.9	✓	✓			✓	✓
<b>Clean Material Reclamation Facilities</b>	0.8				✓		
<b>Dirty Material Reclamation facility</b>	2				✓		
<b>Energy from Waste Facility</b>	2.5	✓	✓			✓	✓
<b>Windrow Composting</b>	2.5	✓		✓			✓
<b>In-Vessel Composting</b>	<2.5	✓		✓			✓
<b>Anaerobic Digestion</b>	<2.5	✓		✓		✓	✓
<b>Pyrolysis and Gasification</b>	0.5	✓			✓		✓

Source: GVA Grimley, 2009

✓ - Characteristic or attribute present in facility type

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- 5.24 The Waste Management DPD will consider all of the facilities included to ensure a flexible and adaptable policy approach is developed to account for different waste management solutions and accommodate future technologies that may emerge over the plan period. This approach accords with national and regional policy guidance, the requirements of Bradford's municipal waste Private Finance Initiative, as well as with the consultation findings from the Waste Management Core Strategy Further Issues and Options where flexibility to allow for technological change was considered particularly important.
- 5.25 It is proposed that the Waste Management DPD will test the characteristics of each potential waste facility site against the site location requirements, from which it will be possible to identify sites that might support particular types of facility. To ensure an objective process is undertaken, each criterion will be scored for the various facility types reflecting the varying importance of some characteristics over others for particular types of facility. The proposed scoring to be applied to achieve this are set out in Figure 15.
- 5.26 Sites are assessed against their suitability for each facility and as such are scored 8 times across up to 8 criteria. There are three methods of scoring and can be summarised as follows;
- Yes/No – These questions can be seen as gateways whereby if sites score negatively then they will be unsuitable for development for that facility type.
  - 0 - 2 – As above although it will not immediately preclude the site for those facilities. Zero will indicate negative aspects, 2 positive and 1 if criteria is unknown or inconclusive.
  - 0 – 5 – These are qualitative questions and sites will be scored across this range depending on the site assessment and other available information. Site will score five if they hold positive aspects of the criteria or zero if the site shows negative characteristics.
- 5.27 The sites with the highest scores will be seen as the most suitable for waste facilities. Theoretically there can be sites which will be unsuitable for certain facilities but scoring highly for others.

**Figure 15: Location Criteria: Suggested Weightings**

	Policy Alignment	Physical Constraints	Current Uses	Proximity to Waste Arisings	Adjacent Uses	Surrounding Environment	Ownership	Road Access	Total
Mechanical Biological Treatment	0-5	0-2	0-5	0-2	Yes/No	0-5	0-5	0-5	0-29
Clean Material Reclamation Facilities	0-5	0-2	0-5	Yes/No	0-2	0-5	0-5	0-5	0-29
Dirty Material Reclamation facility	0-5	0-2	0-5	Yes/No	0-2	0-5	0-5	0-5	0-29
Energy from Waste Facility	0-5	0-2	0-5	0-2	Yes/No	0-5	0-5	0-5	0-29
Windrow Composting	0-5	Yes/No	0-5	0-2	Yes/No	0-5	0-5	0-5	0-27
In-Vessel Composting	0-5	Yes/No	0-5	0-2	Yes/No	0-5	0-5	0-5	0-27
Anaerobic Digestion	0-5	Yes/No	0-5	0-2	Yes/No	0-5	0-5	0-5	0-27
Pyrolysis and Gasification	0-5	0-2	0-5	Yes/No	0-2	0-5	0-5	0-5	0-26
Gateway questions		Yes/No if Water Course		Yes/No if far from Residential	Yes/No if 2/3 Pollutants & adjacent to Residential				

**Issue 4 Option 1: Test the long list of potential waste sites (appendix 1) against the Municipal Solid Waste and Commercial & Industrial waste facility location criteria as identified.**

**Question 16: Are these the right criteria and weightings? If not, then please say why. Are there any additional criteria required?**

- 5.28 A single option is identified in order to ensure the robust and objective testing of different facility type site characteristics. An alternative approach that does not consider the site location characteristics for different facility types is not considered as realistic or suitable in terms of ensuring a transparent and objective method is used within the Waste Management DPD.

## **ISSUE 5: MANAGEMENT OF CONSTRUCTION & DEMOLITION WASTE**

### **OVERVIEW OF ISSUE**

- 5.29 Construction & Demolition waste arisings comprise a significant proportion of total waste arisings within the District, both at the current time and forecast into the future over the plan period. The main sectors generating commercial and industrial waste are outlined in the Waste Management Core Strategy Preferred Options, and include: chemical and metals manufacturing and power and utilities.
- 5.30 The District's growth and development ambitions include a significant scale of economic and housing growth over the plan period. It is likely that this growth will stimulate additional construction and demolition waste arisings above that projected in the longer term, although there is a notable reduction in the levels of construction and demolition waste arising in the immediate period due to the recession.
- 5.31 National policy encourages the management of construction and demolition waste arisings on-site, at the point of origin with an emphasis on re-use and recycling in accordance with the waster hierarchy. This will make a significant contribution to reducing the amount of waste arising from construction and demolition for which waste management sites will need to be identified in the future. It is essential that the Waste Management DPD establishes the

appropriate policy approaches to ensure that construction and demolition waste is reduced or dealt with on-site where possible.

## WHAT ARE THE OPTIONS?

- 5.32 There are three approaches that form the basis for the options for dealing with Construction & Demolition waste in Bradford.
- 5.33 The first suggests that a criterion based approach is taken to require the greater use of on-site re-use and recycling of construction and demolition waste and that these criteria are established within the Waste Management DPD for use during the assessment of any planning applications for land uses or activities that will generate construction and demolition waste.
- 5.34 The alternative option is that the Council develop a criteria based policy to guide the location and siting of new and expanded construction and demolition waste management facilities.
- 5.35 The third option suggests an approach which blends a combination of Options 1 and 2, i.e. looking to maximise on-site re-use and recycling with the identification of new sites to handle construction and demolition waste arisings.

**Issue 5 Option 1: Include criteria based policies in the Waste Management DPD that require the maximisation of on-site recycling and re-use of construction and demolition waste as part of the development process to minimise waste arisings.**

**Issue 5 Option 2: Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.**

**Issue 5 Option 3: A combination of Options 1 and 2.**

**Question 17: Which option do you consider the most appropriate and why?**

**Question 18: Are there any other options that should be considered?**

## ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS

### OVERVIEW OF ISSUE

- 5.36 At a regional level, Yorkshire and Humber dispose of the majority of 'other waste', including hazardous waste and agricultural waste into landfill. Bradford District is the region's fifth largest producer of hazardous waste and agricultural waste. This means that the District has a responsibility to consider approaches to dealing with other waste that help reduce the amounts going to landfill either within or outside the District.
- 5.37 In the short term the region is considered to have sufficient capacity to manage hazardous waste arisings, but in the longer-term there may be a need to identify a strategic hazardous waste site given forecast waste arisings of this type.
- 5.38 Agricultural waste arisings need to be accommodated for within the Waste Management DPD in a similar way to Construction & Demolition waste arisings with more agricultural waste handled on-site through measures to reduce and recycle such waste. The policy approaches outlined in the following options have been developed in light of this and to reflect the findings of previous consultation on the Core Strategy Waste Management Further Issues & Options where stakeholders indicated that the Waste Management DPD should provide further policy and guidance relating to hazardous and agricultural waste.

### WHAT ARE THE OPTIONS?

- 5.39 The policy options reflect the reasonable alternative approaches that can be adopted by the CBMDC for handling hazardous and agricultural waste. Four options are identified representing a range of potential actions from not identifying new sites now, to developing a criteria based policy approach to new hazardous and agricultural waste sites, or a combination of both approaches.

**Issue 6 Option 1: Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period.**

**Issue 6 Option 2: Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.**

**Issue 6 Option 3: Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.**



**Issue 6 Option 4: Develop a policy approach combining either Option 1 or 2 with Option 3.**

**Question 19: Which option do you consider the most appropriate for Issue 6 and why?**

**Question 20: Is it appropriate to assume that agricultural waste will be dealt with at point of origin, rather than requiring new facilities / sites to be identified?**

**Question 21: Should the DPD consider any other types of waste?**

## **ISSUE 7: MANAGEMENT OF RESIDUAL WASTE**

### **OVERVIEW OF ISSUE**

- 5.40 The management of waste that remains after all efforts to reduce, re-use or recycle it have been exhausted is an issue that the Waste Management DPD must consider in order to accord with European legislation, national and regional policy guidance. Guidance strongly discourages land filling of residual waste, but it is realistic and appropriate for CBMDC to plan positively and proactively to manage and handle residual waste arisings in future.
- 5.41 At the current time Bradford District exports a large proportion of its residual waste to landfill, with limited capacity for such activity identified within the District itself. However, there are factors that are and will influence this, including:
- The remaining Regional capacity for landfill is identified by the Regional Technical Advisory Body (RTAB) as 12 years for West Yorkshire; and
  - Existing planning permissions for waste management facilities within Bradford District, together with the PFI programme that will deliver investment in capacity and this combined with new technologies for treating waste will reduce the residual wastes arising.
- 5.42 Nevertheless, it is likely that there will remain a quantity of residual wastes to be landfilled, and CBMDC is required to plan for this.

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## WHAT ARE THE OPTIONS?

- 5.43 There are several alternative approaches that form the basis of options for CBMDC in dealing with its residual waste.
- 5.44 The Waste Management DPD can include appropriate criteria based policies that further encourage and focus efforts on the use of alternative technologies to treat residual waste 'further up' the waste hierarchy to reduce the amount going to landfill.
- 5.45 As an alternative, the Waste Management DPD could identify additional landfill capacity within the District, using the area of search and through the development of location criteria similar to that used for handling other waste streams.
- 5.46 There is the option of combining a criterion based approach to use alternative technologies to reduce residual waste, diverting it from landfill along with the identification of new landfill capacity to ensure that all residual waste is adequately accommodated within the District in future.
- 5.47 Finally, there is the option of utilising the sub-regional capacity, monitoring this capacity and the residual waste arisings, but still identifying additional landfill capacity in the Bradford (using location criteria) for future use. Any identified additional landfill capacity would then only be for use when the sub-regional capacity was nearing exhaustion.

**Issue 7 Option 1: Through the inclusion of appropriate criteria based policies, encourage the use of alternative technologies for the treatment of residual waste through limiting landfill capacity within the District.**

**Issue 7 Option 2: Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.**

**Issue 7 Option 3: Provide a combination of both Options 1 and 2.**

**Issue 7 Option 4: Utilise the existing sub-regional capacity in the first instance, but still provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD. Any identified additional landfill capacity only to be utilised when the sub-regional capacity nears exhaustion.**

**Question 22: Which option do you consider the most appropriate for Issue 7 and why?**

**Question 23: For Issue 7 Option 2, should additional capacity be identified in existing or new sites?**

**Question 24: Are there other options that should be considered for Issue 7?**

## APPENDIX 1: SUSTAINABILITY APPRAISAL OBJECTIVES

Topic	Core Strategy SA Objectives	Draft Waste DPD SA Objectives	Appraisal Questions.
Energy & Resources	<p><b>Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.</b></p> <p><b>Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.</b></p>	<p><b>Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.</b></p> <p><b>Minimise the growth in waste and increase the amount of waste which is re-used, recycled and recovered.</b></p>	<p>Will the plan...</p> <p><b>Lead to a reduction of the amount of waste that will require treatment?</b></p> <p><b>Minimise any adverse impacts on water resources at all stages of waste management?</b></p> <p><b>Put in place adequate and sustainable treatment facilities?</b></p> <p><b>Help the District to meet its recovery and recycling targets?</b></p> <p><b>Help the authority meet its quota under the LATS?</b></p>
	<p><b>Reduce the Districts impact on climate change and vulnerability to its effects.</b></p>	<p><b>Reduce the Districts impact on climate change and vulnerability to its effects.</b></p>	<p><b>Reduce the potential for greenhouse gas emissions caused by waste management and reduce vulnerability of waste management facilities to the effects of climate change (including increased flooding)?</b></p> <p><b>Encourage the development of renewables and energy efficiency within the waste sector?</b></p>
Response to Climate Change			

Topic	Core Strategy SA Objectives	Draft Waste DPD SA Objectives	Appraisal Questions.
Air, Soil & Water Quality	<b>Safeguard and improve air, water and soil resources.</b>	<b>Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites.</b>	Will the plan... <b>Change the amount of pollution and nuisance caused by waste management?</b> <b>Guide waste management towards areas that help to improve the land resource (for example, towards previously used land and away from valuable agricultural land)?</b>
	<b>To conserve and enhance the internationally, nationally, and local valued wildlife species and habitats.</b> <b>Maintain and enhance the character of natural and man made landscapes.</b>	<b>To conserve, restore, expand and enhance the internationally and locally valued wildlife species and habitats.</b> <b>To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes.</b> <b>Ensure restoration to biodiversity end use for waste (landfill) sites and contribute to realising local and national BAP targets.</b>	<b>Include actions that directly or indirectly affect Natura 2000 sites, SSSIs or other designated sites?</b> <b>Include actions that will cause habitat loss or fragmentation or restoration, expansion or enhancement of wildlife networks or habitats?</b> <b>Include actions that help to reach targets or compromise targets of BAPs?</b> <b>Include actions to ensure restoration to biodiversity is a priority where appropriate?</b> <b>Protect, restore and enhance the landscape?</b>
Housing	<b>Provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources.</b>	<b>Increase proximity of waste management infrastructure to current and future centres of population in order to reduce mileage travelled.</b>	<b>Include actions that change mileage travelled per tonne of waste?</b>

Topic	Core Strategy SA Objectives	Draft Waste DPD SA Objectives	Appraisal Questions.
Transport	<p><b>Develop and maintain an integrated and efficient transport network which maximises access whilst minimising detrimental impacts.</b></p> <p><b>Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car.</b></p>	<p><b>Reduce nuisance caused to communities by waste transport.</b></p> <p><b>Encourage a modal shift away from road freight.</b></p>	<p>Will the plan...</p> <p><b>Cause a change in traffic flows or the nature of traffic (an increase in HGVs for example) that affects communities or areas valued for their environmental importance?</b></p> <p><b>Include actions that would encourage a shift from road freight to rail freight?</b></p>
	<p><b>Improve the quality of the built environment and make efficient use of existing land and buildings.</b></p>	<p><b>Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land.</b></p>	<p><b>Reduce the impact of waste management on the quality of the built environment?</b></p> <p><b>Maximise use of previously developed land where possible?</b></p>
Historic Environment	<p><b>Protect and enhance historic assets.</b></p>	<p><b>Avoid, protect and enhance historic assets.</b></p>	<p><b>Preserve and where relevant enhance sites of built and archaeological heritage?</b></p> <p><b>Aim to steer development away from archaeologically sensitive sites?</b></p> <p><b>Preserve, manage or enhance the historic environment character and opportunity areas?</b></p>
	<p><b>Improve the quality and range of services available within communities and connections to wider networks.</b></p>	<p><b>Improve the quality and range of services available within communities and connections to wider networks.</b></p>	<p><b>Improve the accessibility of waste management and treatment services to centres of population?</b></p>
Accessibility & Local Needs			

Topic	Core Strategy SA Objectives	Draft Waste DPD SA Objectives	Appraisal Questions.
Communities	<b>Promote social cohesion, encourage participation and improve the quality of deprived neighbourhoods.</b>	<b>Ensure local communities take more responsibility for their own waste.</b>	<b>Will the plan... Reduce the amount of waste that is treated outside of the District?</b>
Culture, Leisure & Recreation	<b>Create good cultural, leisure and recreation activities available to all.</b>	<b>Avoid impacts on open space, cultural, leisure and recreation opportunities.</b>	<b>Ensure that open space, cultural, leisure and recreation opportunities are not affected by waste management?</b>
Safety & Security / Health & Social Welfare	<b>Improve safety and security for people and property. Provide the conditions and services to improve health and well being and reduce inequality to access to health and social care.</b>	<b>Reduce the impact of the waste industry on people's safety and security, health and quality of life.</b>	<b>Cause a change in the number of people directly affected by waste management (living in close proximity to a site or an access route) whose impact cannot be mitigated? Cause a cumulative impact on certain communities?</b>
Education & Training / Local Economy & Employment	<b>Promote education and training opportunities which build the skills and capacity of the population. Increase the number of high quality job opportunities suited to the needs of the local workforce. Support investment and enterprise that respects the need of a local area.</b>	<b>Support employment in the waste industry for local people. Ensure the provision of adequate waste management capacity.</b>	<b>Include actions that change the number of local people directly employed in skilled jobs in the waste industry? Include actions that ensure the plan contributes to sustainable levels of economic growth by maintaining an adequate provision of waste management capability?</b>

## APPENDIX 2: POTENTIAL SITES LONG LIST

Ref	Name (RUDP ref or name if none)	Address	Location	Type/Source	Comments	Area (Ha)
1	BW/E1.17	PRINCEROYD WAY, INGLEBY ROAD, LISTERHILLS	Bradford West PC	Designated Employment Land	Previously developed site and carried forward from the 1998 adopted UDP. Large relatively level site bordering Bradford Beck with good access to Ingleby Road. A new cycle route runs through this site.	2.01
2	BW/E1.16	BROWNROYD STREET, LISTERHILLS	Bradford West PC	Designated Employment Land	The site is former railway land that has been greened and is level. Proposed cycle route runs through the site, the developer should make further enquiries with the Council.	0.4
3	BW/E1.15	LEGRAMS LANE	Bradford West PC	Designated Employment Land	Existing, level greenfield site carried forward from the 1998 adopted Plan.	0.94
4	BW/E1.12	SHEARBRIDGE MILL, GREAT HORTON ROAD, DIRKHILL	Bradford West PC	Designated Employment Land	Revised site carried forward from the 1998 adopted UDP. Vacant land around Shearbridge Mill. A small watercourse runs through this and arrangements should be made to drain this to a separate system.	0.5
5	BW/E1.9	THORNTON ROAD, THORNTON	Bradford West PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP. Site is large, relatively flat greenfield land on the western end of Thornton village formerly in agricultural use. A public footpath and watercourse run through the site although there is no his	6.68
6	BW/E1.8	BELL DEAN ROAD, ALLERTON	Bradford West PC	Designated Employment Land	Revised greenfield site carried forward from the 1998 adopted UDP on the edge of Allerton estate. Level site with long frontage to Bell Dean Road. Developer may be required to make a contribution toward off site road improvements and further improvement	1.68
7	BW/E1.7	BOWLING OLD LANE, BOWLING	Bradford West PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP and under construction as a car showroom and workshops.	1.28



8	BW/E1.6	SPRING MILL STREET/UPPER CASTLE STREET, BOWLING	Bradford West PC	Designated Employment Land	New site generated from the employment land register with planning approval and under construction.	2.11
9	BW/E1.5	RIPLEY STREET/BOLLING ROAD, BOWLING	Bradford West PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP with planning approval for industrial development. Site suitable for freight transfer.	2.22
10	BW/E1.4	PROSPECT STREET/ROUSE FOLD, BOWLING	Bradford West PC	Designated Employment Land	New site generated from the employment land register with planning approval.	0.82
11	BW/E1.3	RIPLEY ROAD, BOWLING	Bradford West PC	DEL & CFS	Previously developed site carried forward from the 1998 adopted UDP	2.35
12	BW/E1.2	RIPLEY ROAD, BOWLING	Bradford West PC	Designated Employment Land	New site from the Employment land register with planning approval.	0.41
13	BW/E1.1	RIPLEY ROAD, BOWLING	Bradford West PC	Designated Employment Land	Former railway land carried forward from the 1998 adopted UDP. Site investigation required, to establish the potential of the site to flood. Surface water discharge should drain to a separate system within the site.	0.61
14	BW/E1.12	SHEARBRIDGE MILL, GREAT HORTON ROAD, DIRKHILL	Bradford West PC	Designated Employment Land	Revised site carried forward from the 1998 adopted UDP. Vacant land around Shearbridge Mill. A small watercourse runs through this and arrangements should be made to drain this to a separate system.	0.5
15	S/E1.16	THACKLEY OLD ROAD, LEEDS ROAD, THACKLEY	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Located between two industrial units, within the Shipley Employment Zone. Centrally located close to Shipley town centre and good public transport service on Leeds Road. A stone culvert	0.41

16	S/E1.15	LAND BETWEEN THE RAILWAY LINE AND LEEDS-LIVERPOOL CANAL, DOCKFIELD ROAD, DOCK LANE, SHIPLEY	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Located within the Shipley Employment Zone and the Leeds-Liverpool Canal Conservation Area. The site is sandwiched between the canal and the railway line. Adjacent to the Leeds-Liverpool Can	0.98
17	S/E1.14	LAND ADJACENT TO THE AIREDALE ROUTE, CROSSFLATTS	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Located within the Airedale Corridor, a location where employment provision would support the 2020 Vision. The site has planning permission.	1.05
18	S/E1.13	MANYWELLS INDUSTRIAL ESTATE, MANYWELLS BROW, CULLINGWORTH	Shipley PC	Designated Employment Land	New employment site identified in the Employment Land Register. A brownfield site located within Manywells Industrial Estate. Access via industrial estate roads but this may require third party land. Contamination survey required.	0.94
19	S/E1.12	LAND ADJACENT TO MANYWELLS QUARRY/ MANYWELLS INDUSTRIAL ESTATE, CULLINGWORTH	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Located adjacent to Manywells Industrial Estate and a landfill site. Contamination survey required. As well as gas monitoring for any potential migration from the adjacent landfill site. A de	4.27
20	S/E1.11	MAIN STREET, LINGBOB, WILSDEN	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. A brownfield site previously in industrial use and in a village location. Within Wilsden Conservation Area any development will need to reflect the linear orientation of the street scene and be	0.62
21	S/E1.10	CASTLEFIELDS ROAD, CROSSFLATTS	Shipley PC	Designated Employment Land	Within Crossflatts Employment Zone. A brownfield underused site characterised by hard standings and a turning area. Development provides an opportunity to reclaim derelict and potentially contaminated land.	0.85

22	S/E1.9	CASTLEFIELDS LANE, CROSSFLATTS	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within Crossflatts Employment Zone. The site has planning permissions for office and industrial development. Part of the site has been subject to flooding in the past. Therefore, development s	0.72
23	S/E1.8	COOLGARDIE, KEIGHLEY ROAD, BINGLEY	Shipley PC	Designated Employment Land	New employment site. Centrally located within the urban area and close to bus and rail services. Large site to be developed in accordance with Policy E2. Also, a prime site located within the 2020 Vision Airedale Corridor only suitable for B1 and B2 u	3.8
24	S/E1.7	FORMER BINGLEY AUCTION MART, KEIGHLEY ROAD, BINGLEY	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. A brownfield site comprised of vacant land and buildings associated with the former auction market. Development to take place following completion of the Bingley Relief Road. Watercourse crosses	1.76
25	S/E1.6	JOHN ESCRITT ROAD, BINGLEY	Shipley PC	Designated Employment Land	Amended employment site carried forward from the 1998 adopted UDP. Greenfield site within Bingley Employment Zone. Access via John Escritt Road. Development will need to have regard to the nearby Bingley Bog SSSI and the Leeds-Liverpool Canal Conservation	0.5
26	S/E1.4	LAND WEST OF DOWLEY GAP LANE, DOWLEY GAP, BINGLEY	Shipley PC	Designated Employment Land	Amended employment site carried forward from the 1998 adopted UDP. A greenfield site characterised by open fields. The site was constrained by works associated with the construction of the Bingley Relief Road but this is now complete and the substandard	2
27	S/E1.3	BUCK LANE, OTLEY ROAD, BAILDON	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. A prime site located within the Airedale Corridor and Employment Zone. The site has planning permission for the manufacture of hi-tech components.	6.31

28	S/E1.1	OTLEY ROAD, HOLLINS HILL, BAILDON	Shipley PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. A part greenfield part brownfield site characterised by woodland and hard standings. Protected trees on site, a public sewer, gas main and Gill Beck watercourse also cross the site. Located on t	1.84
29	BS/E1.1	INGLEBY ROAD, GIRLINGTON	Bradford West PC	Designated Employment Land	A large level site above the Bradford Beck. The site has been used for waste disposal in the past and therefore a contamination report will be required as part of any planning application. Land should be set aside from the bank of the watercourse to al	3.25
30	BS/E1.2	NORTHSIDE ROAD, LIDGET GREEN	Bradford South PC	Designated Employment Land	New site, arising from the vacant land survey. Soft landscaping is required to the western boundary of the site.	0.47
31	BS/E1.3	HOLLINGWOOD LANE, PARADISE GREEN	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP.	2.31
32	BS/E1.4	BRACKENBECK ROAD, PARADISE GREEN	Bradford South PC	Designated Employment Land	Revised site. Vacant site in modern industrial estate on the edge of an area of urban greenspace.	1.57
33	BS/E1.5	HAVELOCK STREET, GREAT HORTON	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP. A public footpath runs down the north-western edge of the site into the adjacent urban greenspace and this should be retained. Core employment uses only.	0.74
34	BS/E1.6	CHASE WAY, BOWLING	Bradford South PC	Designated Employment Land	Partly developed site carried forward from the 1998 adopted Plan. This is a large site with good access to the motorway. Access for pedestrians/cyclists through this site should be maintained.	7.34
35	BS/E1.7	STAITHGATE LANE NORTH, ODSAL	Bradford South PC	Designated Employment Land	Greenfield on the edge of the urban area with good access to the motorway. Soft landscaping required to the western boundary where the site abuts urban greenspace area. Core employment uses only.	12.18

36	BS/E1.8	MANDALE ROAD, BUTTERSHAW	Bradford South PC	Designated Employment Land	Greenfield site within the Royds area. Access to be agreed as part of a more comprehensive scheme involving other sites. Landscaping will be required to the west and southern boundaries, to reduce the impact of the development on both existing and prop	1.21
37	BS/E1.9	BLACK DYKE MILLS, BRIGHOUSE ROAD, QUEENSBURY	Bradford South PC	Designated Employment Land	Existing site reduced in size following the Inspectors report into the Replacement Plan. The site is greenfield and slopes toward the mill buildings. Access should be taken from a new junction with Brighouse Road which should be sufficient to serve new	2.39
38	BS/E1.11	CROSS LANE, WESTGATE HILL	Bradford South PC	Designated Employment Land	Partly developed site within the Westgate Hill Street Employment Zone.	4.91
39	BS/E1.12	WESTGATE HILL STREET, WESTGATE HILL	Bradford South PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within the Westgate Hill Street Employment Zone. Minor amendments to the site due to the development of the bakery extension. Only core employment e.g. B1, B2 and B8 are suitable on this site.	1.5
40	BS/E1.13	CORDINGLEY STREET, HOLMEWOOD	Bradford South PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Small employment site in the centre of Holmewood. Potential for providing local jobs for local people.	0.49
41	BS/E1.14	SHETCLIFFE LANE, TONG STREET	Bradford South PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within the Tong Street/ Shetcliffe Lane Employment Zone. Awkwardly shaped site, probably only viable for the expansion of the adjacent industrial uses or for storage.	0.96
42	BS/E1.15	KAYCELL STREET/BURNHAM AVENUE, BIERLEY	Bradford South PC	Designated Employment Land	Allocated as an employment site on the Bierley Planning Framework. Within the proposed extension to the Low Street/Dudley Hill Employment Zone. Site provides local jobs for local people.	2.83

44	BS/E1.17	WHARFEDALE ROAD, EUROWAY	Bradford South PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within the Euroway Employment Zone. Possible expansion land for adjacent industrial user. BS/E1.18 MERRYDALE ROAD, EUROWAY 1.96 ha Employment site carried forward from the 1998 adopted UDP. Wi	0.62
45	BS/E1.19	WOODLANDS FARM, EUROWAY	Bradford South PC	Designated Employment Land	Remainder of an employment site carried forward from the 1998 adopted UDP. Within the Euroway Employment Zone. The majority of the site has been developed, only 2.39 hectares are still available for development. Only core employment uses e.g. B1, B2 and	9.48
46	BS/E1.20	ROYDSDALE WAY, EUROWAY	Bradford South PC	Designated Employment Land	Within the Euroway Employment Zone. Currently being developed.	1.01
47	BS/E1.21	COMMONDALE WAY, EUROWAY	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted Plan. Small site, on the edge of the industrial estate, with good access to the motorway.	0.46
48	BS/E1.22	STAITHGATE LANE SOUTH, LOW MOOR	Bradford South PC	Designated Employment Land	New site. Former landfill now reclaimed and greened adjacent to a larger brownfield site and urban greenspace. The site has good access to the motorway and railway and may be particularly appropriate for freight transfer (Local Policy TM21).	2.87
49	BS/E1.23	TRAMWAYS, CLECKHEATON ROAD, LOW MOOR	Bradford South PC	Designated Employment Land	Former Transperience Land with planning approval for redevelopment. Site adjoins 2 areas of urban greenspace and disused railway line at the southern end of the site is protected for cycle use. The site has been split into two parts, north and south, du	7.37

50	BS/E1.24	NEW WORKS ROAD, LOW MOOR	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted Plan. Level brownfield site, which is vacant and underused with good links to the motorway network and access to the city centre. Part of site may be required to form access to proposed railway stat	0.72
51	BS/E1.25	DEALBURN ROAD, LOW MOOR	Bradford South PC	Designated Employment Land	Revised site, partially developed, with B1 business use approval. New access road created from Dealburn Road. Core employment uses only.	1.69
52	BS/E1.26	AH MARKS, WYKE LANE, WYKE	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted Plan. Greenfield site to the east of AH Marks chemical works, designation to allow further expansion of the factory away from the main urban area.	5.42
53	BS/E1.27	STATION MILLS, STOCKTON ROAD, WYKE	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP. Greenfield site adjacent to other industrial uses and the railway line with good access to Huddersfield Road.	0.63
54	BS/E1.28	DEALBURN ROAD, LOW MOOR	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP. The site is brownfield within an established	0.69
55	BS/E1.29	SPARTAN ROAD, LOW MOOR	Bradford South PC	Designated Employment Land	New site arising from the Employment Land register with planning approval.	1
56	BS/E1.31	ROYDS HALL LANE, WOODSIDE	Bradford South PC	Designated Employment Land	Existing site carried forward from the 1998 adopted UDP. The site is level and open scrubby grassland to the south of an established factory. Site access may need to be developed through the adjacent site. Policy E2 applies. Core employment uses only	4.65
57	BN/E1.1	NEVILLE ROAD/LOWER LANE	Bradford North PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Part of a larger redevelopment site within Bowling Employment Zone. Access from either Lower Lane or Neville Road. Clearance and remedial work already taking place on site.	1.17

58	BN/E1.2	NEVILLE ROAD, BOWLING	Bradford North PC	Designated Employment Land	New employment site with planning permission for a wholesale warehouse. Access from Neville Road. Within Bowling Employment Zone.	0.7
59	BN/E1.3	BIRCH LANE, BOWLING	Bradford North PC	Designated Employment Land	Employment site carried forward from 1998 adopted UDP. Within Staygate Employment Zone. Part of a much larger site in Bradford South (Chase Way BS/ E1.6), details in the Bradford South Report.	2.11
60	BN/E1.4	HAMMERTON STREET, BOWLING	Bradford North PC	Designated Employment Land	Employment site carried forward from 1998 adopted UDP. Within Bowling Employment Zone. Very constrained backland site. Access to be taken from Hammerton Street	0.78
61	BN/E1.5	BUCK STREET WEST, BOWLING	Bradford North PC	Designated Employment Land	Remainder of an employment site carried forward from the 1998 adopted UDP. Within Bowling Employment Zone. Access to be taken from Buck Street. A public sewer and Eastbrook Beck cross the site, these restrict the development of the site, and will need t	0.89
62	BN/E1.6	STEADMAN STREET, LEEDS ROAD	Bradford North PC	Designated Employment Land	Part of a former housing site in the 1998 adopted UDP. Within Regen 2000 Area. Previous planning permission for industrial/commercial uses.	0.43
63	BN/E1.11	DICK LANE, LAISTERDYKE	Bradford North PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within Newlands SRB area. Possible expansion for adjacent industrial premises, but could be developed independently from existing access off Dick Lane, to link in with recent hotel and B1 uses to	0.55
64	BN/E1.12	GAIN LANE, THORNBURY	Bradford North PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within Newlands SRB area. Large site to be developed in accordance with Policy E2. A prime site only suitable for B1 and B2 uses. Footpath and cycling routes must be incorporated in any develop	7.06



65	BN/E1.14	HARROGATE ROAD, GREENGATES	Bradford North PC	Designated Employment Land	Extended employment site carried forward from the 1998 adopted UDP. It is located in an area of high unemployment with few employment site opportunities, and on major transport routes close to Leeds/Bradford Airport in the Aire Valley. Although the site	3.26
66	BN/E1.15	CANAL ROAD, BOLTON	Bradford North PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within Canal Road Employment Zone. Development of the site must be designed so that it does not have an adverse impact on the adjacent site of Local Nature Conservation Value.	0.57
67	BN/E1.16	PARRY LANE, BOWLING	Bradford North PC	Designated Employment Land	Employment site carried forward from the 1998 adopted UDP. Within Bowling Employment Zone. Access to be taken from Parry Lane.	0.86
68	BN/E1.17	WOODHALL ROAD, THORNBURY	Bradford North PC	Designated Employment Land	New greenfield site located on the edge of the urban area. Formerly designated as Green Belt. Large site to be developed in accordance with Policy E2. A prime site only suitable for core employment uses. Extensive landscaping is required around the periphery	9.85
69	K/E1.2	OFF STEETON GROVE, STEETON WITH EASTBURN	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A brownfield site within the settlement. The site may be contaminated and development would be required to provide wildlife habitats. Access is only available through existing works. The site is in the	1.19
70	K/E1.3	STATION ROAD, STEETON WITH EASTBURN	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A brownfield site on the edge of the settlement. Access is only available through the existing depot. The site is in the Airedale Corridor, a location where employment provision would support the 2020 Vi	0.56

71	K/E1.5	BELTON ROAD, SILSDEN	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A greenfield site within the settlement. Retention of mature trees is essential, as is the provision of a buffer zone to the residential properties to the north of the site. The site may be contaminated.	4.99
72	K/E1.6	KEIGHLEY ROAD (NORTH), SILSDEN	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A greenfield site within the settlement. A number of mature trees and a natural stream on site must be retained. The site is in an Employment Zone and the Airedale Corridor, a location where employment p	0.53
73	K/E1.7	KEIGHLEY ROAD (CENTRE), SILSDEN	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A greenfield site within the settlement. A number of mature trees and a natural stream on site must be retained. The site is in an Employment Zone and the Airedale Corridor, a location where employment p	0.69
74	K/E1.8	KEIGHLEY ROAD (SOUTH), SILSDEN	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. Site fully developed for employment use.	1.04
75	K/E1.9	SYKES LANE, SILSDEN	Keighley PC	Designated Employment Land	A Greenfield site carried forward from the 1998 adopted UDP. It lies within the Airedale Corridor and is a good location for B1 and B2 employment provision in accordance with 2020 Vision.	2.38
76	K/E1.10	BACKSTONE WAY, ILKLEY	Keighley PC	Designated Employment Land	A new greenfield site within the settlement, one of only two Employment Sites in Ilkley. Use as expansion land for adjacent premises would avoid highway problems associated with independent access via Backstone Way.	1.25
77	K/E1.11	ASHLANDS ROAD, ILKLEY	Keighley PC	Designated Employment Land	A new greenfield site within the settlement, one of only two Employment Sites in Ilkley. The site is well related to town/local facilities and public transport services. Development must incorporate a cycle way and publicly accessible recreation open spa	1.03

78	K/E1.12	AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY	Keighley PC	Designated Employment Land	Revised site from adopted UDP. The western part of the site is derelict and potentially contaminated, the remainder is greenfield and the whole is within the urban form. The site is in an Employment Zone and the Airedale Corridor, a prime location for	2.8
79	K/E1.13	DALTON LANE, WORTH VILLAGE, KEIGHLEY	Keighley PC	Designated Employment Land	A new brownfield site within the urban form. The site is within walking distance of Keighley town centre and surrounded by existing industrial uses. The site is in an Employment Zone and the Airedale Corridor, a location where employment provision would	0.77
80	K/E1.14	AIREWORTH ROAD, WORTH VILLAGE, KEIGHLEY	Keighley PC	Designated Employment Land	A new brownfield site within the urban form that is within walking distance of Keighley town centre. Development of the site would need to comply with Policy NR15A with regard to flood risk and would re-use a vacant listed building. The site is in the	1.73
81	K/E1.15	MITCHELL STREET, EASTWOOD, KEIGHLEY	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A brownfield site within the urban form. Access is dependent on minor roads, which could restrict development of the site to that of expansion land for adjacent firms. The site is in an Employment Zone a	0.86
82	K/E1.16	EAST AVENUE, LAWKHOLME, KEIGHLEY	Keighley PC	Designated Employment Land	Site carried forward from the 1998 adopted UDP. A brownfield site within the urban form and closely associated with other employment uses. Access is dependent on minor roads, which could restrict development of the site to that of expansion land for ad	0.6
83	K/E1.17	HOLME MILL LANE, FELL LANE, KEIGHLEY	Keighley PC	Designated Employment Land	A new brownfield site close to the edge of the urban form. Planning permission granted for employment use.	0.79

84	K/E1.18	BEECHCLIFFE, KEIGHLEY	Keighley PC	Designated Employment Land	Amalgamation of four sites carried forward from the 1998 adopted UDP. A combination brownfield/greenfield site on the edge of the urban area. Development of the site would need to comply with Policy NR15A with regard to flood risk, consequently only 5.4	9.54
85	K/E1.23	BRADFORD ROAD, CROSSFLATS, KEIGHLEY	Keighley PC	Designated Employment Land	New Greenfield predominately flat employment site. The site is well located for employment use and within the Airedale development corridor.	1.49
86	K/NR1.4	Woodcock Delph	Keighley	Exhausted Mineral Workings		2.38
87	BW/NR1.3	Chellow Grange Quarry, Haworth Road, Bradford	Bradford West	Exhausted Mineral Workings		0.62
88	BW/NR1.2	Lower Bottomley Lane Quarry	Bradford West	Exhausted Mineral Workings		0.4
89	BW/NR1.4	The Shay/Soil Hill, Queensbury, Bradford	Bradford West	Exhausted Mineral Workings		4.4
90	BN/NR1.2	Fagley Quarry, Fagley	Bradford North	Exhausted Mineral Workings		2.15
91	BINGLEY CAR P	Ferncliffe Road Bingley	Bingley	Amenity Site		0.34
92	BOWLING BACK	Bowling Back Lane Bradford	Bradford	Amenity Site & Waste Transfer		4.3
93	DOWLEY GAP H.	Wagon Lane	Bingley	Amenity Site		0.47
94	FORD HILL H.W	Hill End Lane Queensbury	Queensbury	Amenity Site		0.75
95	GOLDEN BUTTS	GOLDEN BUTTS	Ilkley	Amenity Site		0.6
96	KEIGHLEY H.W	Royd Ings Avenue Keighley	Keighley	Amenity Site & Waste Transfer		1.9

97	MIDLAND ROAD	Midland Road, Manningham	Bradford	Amenity Site	0.19
98	SUGDEN END H.	Halifax Road Keighley	Shearbridge Road,	Amenity Site	0.6
99	WILSON ROAD H	Dealburn Road Low Moor	Bradford South	Amenity Site	0.4
100	Shearbridge D	Shearbridge Road, Bradford	Bradford West	Council Depot	1.97
101	Cleansing Dep	Harris Street	Bradford	Council Depot	0.78
102	Stockbridge D	Royd Ings Ave, Stockbridge	Keighley	Council Depot	2.45
103	BN/E1.13	VICTORIA ROAD	Bradford North PC	Designated Employment Land	0.65
104	BS/E1.18	MERRYDALE ROAD, Euroway	Bradford South PC	Designated Employment Land	1.96
105	Car Park St L Hospital	North Newall Street Car park	Bradford West	Unallocated	0.87
106	Wilson Road	Open space to North of Wilson Road South of Elizabeth avenue part of larger area	Bradford South	Unallocated	3.21
107	Reevy Beacon	Beacon Road rear of The beeches	Bradford South	Unallocated	1.49
108	South BS/E1.8	Bellerby Brow	Bradford South	Employment Site	1.56
109	Calder Banks	Corner of Baldwin lane and Highgate road to the south	Bradford South	Green Belt	0.41
110	South of Refu	Long lane, Bradford	Bradford South	Unallocated	2.96
111	Springfeild	South of Friars Industrial estate, north of Arthur Street	Bradford North	Unallocated	1.78
112	Yates Flat	Adjacent to Chicken Farm, near Bolton Hall Rd	Bradford North	Unallocated	0.86

113	Vacant Site C	Canal Road, Bradford west of gasholders	Bradford	Unallocated		2.31
114	Fearnshides St	Rear of Housing West Fearnshides Street	Bradford West	Unallocated		0.84
115	Woodhall Retail	Rear of Woodhall Retail centre superstore	Bradford North	Unallocated		1.61
116	Laisterdyke	Between Laisterdyke and Dick Lane	Bradford North	Unallocated		5.63
117	Vacant site south of garage	Corner of Stoney Lane and Wilsden Road	Shipley	Unallocated		0.38
118	Green Space	Vacant Land Bingley	Bingley	Unallocated		0.85
119	Marriner Road	Riverside open space Keighley	Keighley	Unallocated		1.17
120	Thornbury Road	Behind Mosque and adjacent to college	Bradford North	Unallocated		1.04
121	Steel Stock and Scrap stockholders site	Birkshall lane	Bradford North	Unallocated		4.1
122	Simpson Green	North West of Simpson green Farm, Mitchell land	Bradford North	Unallocated		0.66
123	Esholt Sewage treatment works	Adjacent to Canal Esholt, across from Ainsbury Avenue	Shipley	Call for Sites	Major developed area within greenbelt	1.42
124	Esholt Sewage treatment works	Adjacent to Boggart House Esholt	Shipley	Call for Sites	Major Developed Site in Greenbelt	0.35

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