

Local Development Framework for Bradford

Waste Management DPD

Issues and Options

Summary of Representations



LOCAL DEVELOPMENT FRAMEWORK FOR BRADFORD

Waste Management DPD

Issues and Options Consultation

(Regulation 25)

SUMMARY REPRESENTATIONS

JANUARY 2010

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WASTE MANAGEMENT ISSUES & OPTIONS CONSULTATION

SUMMARY OF REPRESENTATIONS

1.0 INTRODUCTION

- 1.1 As required by The Town and Country Planning (Local Development) (England) 2004 Regulations, consultations have been carried out on the Waste Management DPD: Issues & Options in accordance with Regulation 25 and 27. The Regulations require Local Planning Authorities to consider any representations made within a six-week period of consultation and to have regard to them when preparing a Development Plan Document for submission to the Secretary of State.
- 1.2 Over 1000 organisations and individuals were notified by letter and email of the Issues & Options consultation and the availability of the supporting documents. Subsequently, approximately 60 copies of the Report were sent to specific and general consultation bodies as required by the Regulations and also to individuals who had requested a copy. A list of all those notified can be found in Section 6.0 of this report.
- 1.3 Respondents in many cases used only the Council's Comment Form to reply; others submitted detailed and lengthy written representations either instead of or in addition to the questionnaire. Copies of the representations can be found in Appendix 3 of this report. A copy of the comment form can be found in Section 3.0
- 1.4 The attached Schedule of Representations sets out in tabular form the Representations from the 20 organisations and individuals who replied.

- 1.5 The Schedule of Representations does not include comments received at the stakeholder consultation event. These replies can be found within the event Consultation Log.

2.0 ENVIRONMENT AND WASTE MANAGEMENT IMPROVEMENT COMMITTEE

- 2.1 Following the meeting of the Council Executive Committee on 20th October 2009, it was recommended that the Waste Management DPD be referred to the Environment and Waste Management Committee for comment as part of the consultation.
- 2.2 The Waste Management DPD: Issues and Option report was presented to the Environment and Waste Management Committee on 9th December 2009. The Committee decided it would examine the report and defer this item to the next Committee meeting scheduled for the 2nd February 2010.
- 2.3 Following various questions on the Waste Management DPD: Issues and Options report at the Committee meeting of 2nd February 2010, written comments were received on 24th February 2010.

3.0 LETTER OF CONSULTATION

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Department of Regeneration

Local Development Framework Group

8th Floor Jacob's Well
Manchester Road
BRADFORD
West Yorkshire BD1 5RW

Tel: (01274) 434050

Fax: (01274) 433767

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E-Mail: ldf.consultation@bradford.gov.uk

Web site: www.bradford.gov.uk/ldf

My Ref: TDP/P&P/LDF/WDPD/I&O

Your Ref:

9th November 2009

Dear Sir/Madam,

**The Local Development Framework for Bradford District
Waste Management Development Plan Document (DPD): Issues and Options
Consultation (Regulation 25)**

I write to inform you that the Council is currently carrying out an informal consultation on the Waste Management DPD: Issues and Options for a period of twelve weeks commencing on Monday 9th November 2009 until Monday 25th January 2010.

The Waste Management Development Plan Document is one of the key documents that form part of the Bradford Districts emerging Development Plan under the new Local Development Framework (LDF). You will no doubt be aware of the considerable work already undertaken to develop the LDF Core Strategy, over recent years. The Core Strategy will establish the strategic approach to development and change in the District, including waste management. Ensuring a sustainable waste management solution for the district is a priority for the Bradford. The Waste Management DPD will establish the detailed approach to delivery the broad approach in the Core Strategy. In particular when adopted, the Waste Management DPD will:

- Set out the broad vision for the future of waste management within the District and objectives for sustainable development of waste management over the next 10 – 20 years.
- Set out spatial policies for steering and shaping the development of waste management to deliver both the vision and objectives
- In particular, set out the potential locations for new waste management facilities for the main types of waste
- Take account of national and regional policy and the Council's priorities in the and 'The Big Plan' the sustainable Community Strategy for the district and the policies of emerging Core Strategy

At this early stage in the process the Council is seeking your views on the key issues facing waste management, and the way that these can be addressed. The following documents are enclosed with this letter and are subject to public consultation:-

- Waste Management Issues and Options Report

There are also several supporting documents:

- Issues and Options Comment Form
- Engagement Plan
- Waste Management Issues and Options Report Methodology Statement
- Waste Management DPD Sustainability Appraisal Scoping Report
- City of Bradford MDC – A Guide to the New Development Plan System
- City of Bradford MDC – A Jargon Buster Guide to the LDF

All of the above documents can be downloaded from the Council's website via the Local Development Framework pages found at www.bradford.gov.uk/ldf

Hard reference copies are also available in the Council's Planning Offices at: Jacob's Well, Bradford, and the Town Halls at Ilkley, Keighley and Shipley. Or in the Main Libraries at: Shipley, Bingley and Bradford Central Library. In addition, hard copies are available on request from the LDF Group.

The Council welcomes your views and comments and will take these into account when producing the Preferred Options. Please make your comments in writing and return them to:

ldf.consultation@bradford.gov.uk

Alternatively they can be faxed to (01274) 433767

Or sent hard copy to FREEPOST address:

Bradford Local Development Framework
FREEPOST NEA 11445
PO Box 1068
BRADFORD
BD1 1BR

Please mark comments as 'Waste Management Issues and Options'.

Comments should be received by Monday 25th January 2010

Please note that representations cannot be treated as confidential and a schedule of all representations received will be published.

As part of the consultation the Council is holding a half-day stakeholder event, to discuss issues surrounding waste management in the Bradford District to which members of the waste industry, stakeholders and other interest groups are invited. The event will take place on **Tuesday 8th December 2009 at the Norcroft Centre, Bradford University, Tumbling Hill Street, Bradford, BD7 1DB**. It will run from **9.30am to 1.00pm**, with refreshments provided from 9.15am.

Each event will include a number of short presentations to set the background to the Waste Management Issues and Options. There will then be a number of workshops where a range of issues raised in the report can be debated.

Above all, however, this is an opportunity for those who are involved or have an interest in the waste industry matters to let us know what issues and policies you think the Waste Management DPD should be including and addressing.

If you wish to attend this event please fill in and return the enclosed booking form by **Tuesday 1st December 2009**. Places are limited by the capacity of the venue so please book as soon as possible to avoid disappointment.

Should you require clarification on any of the above or further information, please contact the LDF Group on (01274) 434296.

Yours sincerely,

Andrew Marshall
Strategy Manager

Enc.

4.0 COMMENT FORM

FOR OFFICE USE ONLY		
Rep No	Date Entered	Officer



Form for commenting on the Waste Management DPD Issues and Options Consultation

(9th November 2009 – 25th January 2010)

The Council is consulting on the Waste Management DPD: Issues and Options. The document available for public comment is the Waste Management: Issues and Options Report.

You may photocopy this form or obtain further copies free of charge from the Council. The form is also available to download on the Council's website on www.bradford.gov.uk/ldf. It is recommended that representations be made on this form as this helps us to consider your comments properly. If you find it easier to answer the questions on separate sheets please ensure you are clear about the question you are answering. Please complete the form in black ink, clear writing or typing to aid processing. If you require any assistance completing this form or would like a copy in large print, Braille etc, please contact the LDF Group on 01274 432499.

Data Protection Act 1998

Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purpose of preparing the Local Development Framework

Your Details:

Title..... Surname..... Forename.....

Address.....

.....

Organisation:

Tele No: Home..... Work..... Mobile.....

Fax: Email:

Waste Management DPD: Issues and Options Paper

Key Questions

Bradford Council is seeking your views on the Waste Management Issues and Options raised within the Development Plan Document (see www.bradford.gov.uk/ldf)

Cross-Boundary Considerations
<p>1. How should BMDC work jointly with neighbouring local authorities and those where the District currently exports its waste? Actions could include:</p> <ul style="list-style-type: none"> • Information sharing relating to key waste data indicators, their analysis and interpretation; <input type="checkbox"/> • Collaborative working on emerging waste DPD's and their reviews; <input type="checkbox"/> • Commenting on waste related planning applications; and <input type="checkbox"/> • The commissioning of joint reviews, data updates and specific waste related studies. <input type="checkbox"/>

Objectives
<ul style="list-style-type: none"> • 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.
<p>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?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

Forecast Future Waste Arisings	
<p>3. Do we need to allocate sites for all categories of waste or do we just need to allocate site for MSW and C&I waste?</p> <p>All Categories of Waste <input type="checkbox"/> MSW and C&I Waste Only <input type="checkbox"/></p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	<p>5. Are the levels of waste to be planned for within the DPD realistic or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

<p>.....</p> <p>.....</p> <p>.....</p>	<p>.....</p> <p>.....</p> <p>.....</p>
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<p>4. Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste) categories of waste? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	<p>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.</p> <p>Are there other approaches of minimising waste arisings that the Council should promote in the DPD?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
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Regional and National Policy	Agricultural and Other Waste
<p>7. Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and re-use of waste? Yes <input type="checkbox"/></p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>No <input type="checkbox"/></p>	<p>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? Yes <input type="checkbox"/></p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>No <input type="checkbox"/></p>

ISSUES AND OPTIONS

ISSUE 1: INTERNAL WASTE MANAGEMENT	
Option 1	Option 3
Focus on consolidating and increasing capacity at existing facilities across the District, and recognise that some waste will need to be managed outside Bradford.	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.
Option 2	Option 4
Provide additional sites and capacity to manage growing waste arisings within the District.	Work with adjacent authorities to identify appropriate sites / facilities to accommodate waste arisings as closely as possible to their source.
Option 5	Question 9
Minimise waste production / arisings across the District through appropriate planning policies, therefore minimising site allocations required.	Which Option or combination of options for Issue 1 are the most appropriate and why?
Question 10	Question 11
Assuming Option 2 and/or 3 are preferential, what type of facilities should be provided?	What other options should be considered?

ISSUE 2: LOCATION OF WASTE SITES	
Option 1	Option 2
Concentrate waste management facilities in a small number of strategic sites / locations.	Identify a large number of small sites dispersed across the District for waste management purposes.
Question 12	Question 13
Which option for Issue 2 is the most appropriate and why?	Should different approaches be applied to different waste streams?
Question 14	
Are there any other options that should be considered for Issue 2?	

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES	
Option 1	Option 2
Test all sites on the initial long list within the area of search, excluding those in the Green Belt other than existing facilities.	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 Alternative options?	

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES	
Option 1	Question 16
Test the long list of potential waste sites (appendix 1) against the Municipal Solid Waste and Commercial & Industrial waste facility location criteria as identified.	Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE	
Option 1	Option 2
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.	Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.
Option 3	
Combination of Options 1 and 2.	
Question 17	
Which option do you consider the most appropriate and why?	Question 18
	Are there any other option that should be considered?

ISSUE 6 MANAGEMENT OF 'OTHER' WASTE STREAMS	
Option 1	Option 2
Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period	Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.
Option 3	Option 4
Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.	Develop a policy approach combining either Option 1 or 2 with Option 3.
Question 19	Question 20
Which option do you consider the most appropriate for Issue 6 and why?	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	
Option 1	Option 2
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.	Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.
Option 3	Option 4
Provide a combination of both Options 1 and 2.	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	Question 23
Which option do you consider the most appropriate for Issue 7 and why?	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?	

Please note that representations cannot be treated as confidential and a schedule of all representations received will be published

Please detach the completed comment form and return by Monday 25th January 2010 to:

Bradford Local Development Framework Group
FREEPOST NEA11445
PO BOX 1068
BRADFORD,
BD1 1BR
email: ldf.consultation@bradford.gov.uk
Fax 01274 433767

Hand Deliver to the any of the districts planning offices in the City Centre, Keighley, Shipley and Ilkley.

5.0 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
1.		Sara Robin	Yorkshire Wildlife Trust	
2.		Damian Walsh	Martin Walsh Associates	
3.		Louise Nurser	Lancashire Country Council	
4.		Imogen Scotney	Earth Tech Skenska	Scott Wilson
5.		Toni Rios	Highways Agency	
6.		Ian Sanderson	West Yorkshire Archaeology Advisory Service	
7.		Steve Gibbs	P Casey	The Arley Consulting Company
8.		Ian Smith	English Heritage	
9.		Rose Freeman	Theatres Trust	
10.		Mrs. C. Brown	Steeton-with-Eastburn Parish Council	
11.		Anne Dugdale	Aire Valley Environmental	Covanta / Walker Morris
12.		Alison Munday	Government Office for Yorkshire and the Humber	
13.		John Pilgrim	Yorkshire Forward	
14.		Mrs. Jo. Griffiths	Burley Parish Council	
15.		Sally Armstrong	Environment Agency	
16.		Mark. E.N. Harrison	Coal Authority	
17.		Mr Martin Millmore	Minerals Planning Group	
18.		Mrs Susan Stead	Bradford Urban Wildlife Group	
19.		Ian Bairstow / Richard Longcake	Waste Disposal Authority	
20.			Environment and Waste Management Improvement Committee	

6.0 SCHEDULE OF WRITTEN REPRESENTATIONS

GENERAL COMMENTS		
Rep ID	Name / Organisation	Summary of Representation
	Steve Gibbs - The Arley Consulting Company Limited on behalf of P Casey (Enviro) Ltd (PCE)	<p>The consultation refers to preferred option, for example, at Para 5.10. In July 2009 issue of “Plan-it Bradford”, it appeared to be envisaged that two consultations would take place in parallel. Without knowing the content of this related document, we cannot know whether it would be relevant to our responses to the Waste DPD Issues and Options, for example, as discussed below in relation to Question 22.</p> <p>APPLICABILITY TO LANDFILL AND OTHER OPTIONS</p> <p>PCE consider that there is some uncertainty as to whether some of the Issues, Options and Questions are intended to apply to landfills.</p> <p>Para 2.9 includes landfills within the terminology “waste management facilities”</p> <p>However, Figures 14 and 15, within Issue 4 – “Locational criteria” do not include landfills.</p> <p>Issue 1 seems to be concerned primarily with the balance of imports, exports and the management of wastes within the district.</p> <p>Issue 7 seems concerned with similar issues in relation to landfill.</p> <p>PCE’s impression is therefore that Issue 7 is intended to relate to landfill, and Issues 1-6 to other options. However, para 5.45 refers to the Area of Search in the preferred option. Para 5.11 seems to envisage that that is in the public domain.</p> <p>PCE is therefore unclear as to whether Issue 2 is intended to apply to landfill/</p> <p>PCE suggests that in the next stages the applicability of the content, and the use of the terms “facilities” and “sites” is made clear.</p>
	Environment Agency	<p><u>Flood Risk</u></p> <p>The issues and options document does not mention flood risk, which is an important consideration in locating waste management sites. Please see the following comments on flood risk.</p>

GENERAL COMMENTS		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	<p><u>Sequential Test and Exception Test</u></p> <p>Any development proposed in either high risk flood zone 3 or medium risk flood zone 2 must pass the Sequential Test and where necessary the Exception Test, as outlined in Planning Policy Statement 25 (PPS25).</p> <p>PPS25 advocates a sequential approach to siting developments with preference given to those sites in low risk flood zone 1 (defined as having a less than 1 in 1000 annual probability of river flooding in any year). Only where no reasonably available alternative sites are available in flood zone 1 should consideration be given to locating development in medium risk flood zone 2 (defined as having between a 1 in 100 and 1 in 1000 annual probability of river flooding in any year). Development should only be considered in high risk flood zone 3 (defined as having a 1 in 100 year or greater annual probability of river flooding in any year) where there are no reasonably available alternative sites in either flood zones 1 or 2. See Annex D of PPS25 for further information.</p> <p>PPS25 classifies landfill and waste management facilities for hazardous waste as uses which are 'more vulnerable' to flood risk. All other waste treatment sites are classified as being 'less vulnerable' to flood risk. When assessing potential waste management sites consideration must be given to the flood risk vulnerability classification PPS25 has assigned the proposed use. A 'more vulnerable' use proposed in high risk flood zone 3a which passes the Sequential Test, must then go on to pass the Exception Test (Table D.3, paragraph D9). Neither 'more' or 'less' vulnerable development (i.e. any type of waste site) is permissible in flood zone 3b – classed as 'functional floodplain'.</p> <p><u>Site Specific Flood Risk Assessment</u></p> <p>All development proposals in medium risk flood zone 2 and high risk flood zone 3 must be accompanied by an FRA which demonstrates that the development can remain safe in the event of a flood and will not increase flood risk to the site or elsewhere.</p> <p>All development proposals over one hectare in flood zone 1 must also be accompanied by an FRA. In this case the FRA should demonstrate that surface waters will be managed to avoid increased flood risk to the site or elsewhere.</p>

GENERAL COMMENTS		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	<p>Flood risk assessments should be carried out to the appropriate degree of detail and assess the risks of all forms of flooding to and from development and must take climate change into account, as required by PPS25.</p> <p>Those developments within flood zones 2 and 3 which pass the Sequential Test and where necessary the Exception Test, must adopt a sequential approach to site layout. The site layout must aim to keep those elements of the development most vulnerable to flooding in the lowest flood risk areas of the site. The development should also have appropriate mitigation measures to reduce the impact of flood events.</p>
	Bradford Waste Disposal Authority (WDA)	<p>Comment - Chapter 2 the waste forecasting needs to be revisited (MSW over estimates) some of the values in the table dated 2005! In 2.7 given that there is still plenty of landfill (including active waste) in the sub region, Bradford is likely to continue to export residual waste arising from waste treatment activities, and thus should not be criticised for such export of residual wastes into the sub region.</p> <p>Chapter 4 Comment - MSW values and % recycled can be updated via data held by waste management (4.9, 4.10).</p>
	Environment and Waste Management Improvement Committee	<ul style="list-style-type: none"> ▪ Strengthen strategy for then than MSE ▪ Ensure Bradford MDC does take responsibility for all waste

CROSS BOUNDARY CONSIDERATIONS

Question 1: How should BMDC work jointly with neighbouring local authorities and those where the District currently exports its waste?

Rep ID	Name / Organisation	Summary of Representation
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CROSS BOUNDARY CONSIDERATIONS		
Question 1: How should BMDC work jointly with neighbouring local authorities and those where the District currently exports its waste?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Information sharing relating to key waste data indicators, their analysis and interpretation.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	<p>It is considered that CBMDC should work together with neighbouring local authorities within West Yorkshire to find joint solutions for waste management where such solutions offer benefits in terms of proximity¹, affordability and sustainability etc. Except in the case of specialist facilities which are designed to manage single waste streams or hazardous wastes for example, it should be recognised that proximity and sustainability criteria are unlikely to be met if such joint facilities manage waste arising from or transported to location outside of the West Yorkshire sub-region.</p> <p>Connected with this, CBMDC should consider, in preparing the Waste Management DPD, that it will be relevant not simply to plan to manage all of the waste arising within the administrative area of Bradford but that some of Bradford's waste is likely to be exported while waste from other neighbouring local authorities may be imported.</p> <p>Information sharing, data updates and collaborative working on emerging DPD's and their reviews is therefore particularly important, so that CBMDC can fully appreciate, inter alia:</p> <ul style="list-style-type: none"> ▪ Changing circumstances in neighbouring local authorities; and ▪ Any need to change the level of waste management facility provision in Bradford as a result of changes in the type and amount of waste imported to and exported from Bradford, <p>And thus CBMDC is able to plan accordingly.</p>
	Highways Agency	The Highways Agency sees joint working with neighbouring authorities as very important, particularly due to not only the amount of waste currently exported from the District but also the amount of waste which is currently imported. Therefore, the District also needs to work jointly with those authorities which import waste to Bradford District.

CROSS BOUNDARY CONSIDERATIONS		
Question 1: How should BMDC work jointly with neighbouring local authorities and those where the District currently exports its waste?		
Rep ID	Name / Organisation	Summary of Representation
	Yorkshire Wildlife Trust	All of the above [options for question 1]. Cooperation with adjacent authorities will have many advantages and lead to more efficient waste planning.
	Burley Parish Council	[Supported all options for joint working]
	Environment Agency	<p><u>Cross-Boundary Considerations</u></p> <p>We agree that Bradford should work closely with neighbouring local authorities in the areas listed. We would also like to see <i>'sharing information and experience of new waste technology'</i> included in the list of actions.</p> <p>There should be a joint approach to the management of specific waste streams in order to achieve the highest levels of resource recovery. For example, despite both waste wood and food wastes having recognised treatment technologies aimed at removing them from residual waste streams, a large percentage is still disposed of as residual waste.</p>
	Bradford Wildlife Group	<ul style="list-style-type: none"> ▪ Information sharing relating to key waste data indicators, their analysis and interpretation ▪ Collaborative working on emerging waste DPD's and their reviews ▪ The commissioning of joint reviews, data updates and specific waste related studies
	Bradford Waste Disposal Authority (WDA)	Joint working with neighbouring councils is a 2 way process and we need to understand their views on working with us. As waste has impacts beyond the development site (traffic and emissions) consideration of neighbouring LPA's will be needed in determining waste applications, we should be open to working with neighbouring LPA's on as many levels as possible to assist in determining applications, however possible sites and policies within Bradford district are a matter for Bradford.
	Environment and Waste Management Improvement Committee	<ul style="list-style-type: none"> ▪ All actions should be explored with neighbouring authorities ▪ Need to learn lessons from the aborted interim waste contract ▪ Is there a contradiction between paragraphs 3.22 and 3.23? ▪ Council should consider commissioning a comprehensive academic led review of its waste management strategies that assesses performance in relation to best practice worldwide, seeking to identify opportunities to incorporate lessons learnt.

OBJECTIVES

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?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	If the objectives are read holistically, they are broadly supported. However, if the third point is read in isolation, CBMDC is invited to note it is appropriate (and in accordance with national guidance as stated in PPS10) to plan for an appropriate contribution to the waste needs of the sub-region and not just the Bradford community.
	Highways Agency	<p>The aim of self-sufficiency is welcomed as large amounts of waste are currently being exported, primarily to Wakefield District, resulting in HGV trips on the Agency's Strategic Road Network (SRN). However, it does appear that the commitment to self-sufficiency is a little weaker now that it was in 2007. The February 2007 Topic Paper stated that the District "<i>should look to be self sufficient</i>" in managing the waste it generates, whereas the current Issues and Options document states that the District is "<i>to be more self-sufficient</i>" in managing its own waste" and it is "<i>to minimise the amount of waste sent on the landfill sites within and outside Bradford District</i>".</p> <p>We consider that minimising transport needs should be a consideration in inter-authority discussions on sub-regional waste issues to comply with the spirit of PPS10.</p> <p>The only local circumstance which should be considered which would result in a departure from these objectives is if there is an existing waste handling facility in a neighbouring authority which is closer to the point of source than the nearest alternative particularly if that means potential HGV movements on the SRN can be removed. We have not seen a reference to the location proposed for the new waste management facility referred to in paragraphs 3.21-3.24 of the Issues and Options document.</p>
	Yorkshire Wildlife Trust	No Comment Made

OBJECTIVES		
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?		
Rep ID	Name / Organisation	Summary of Representation
	English Heritage	In view of the Governments objectives regarding sustainable waste management, one might have expected the objectives to have included some reference to ensuring that new waste developments are provided for in a way that protects human health and the environment. Consequently, it is suggested that the third objective is amended to read:- <i>“To ensure that expanded and new waste developments support the planned growth and waste needs of Bradford and are delivered in a manner which protects the District’s environmental assets and safeguards human health.”</i>
	Burley Parish Council	No
	Environment Agency	<u>Objectives – waste as a resource</u> The objectives for waste management make sense but we would like more emphasis on waste as a resource. We would add to the list of objectives: <i>‘To consider and plan for the use of waste as a raw material/energy source for local industry both existing and new’.</i>
	Bradford Wildlife Group	I believe the Bradford District is coping better than some Authorities over the collecting and to recycle more domestic waste has been achieved partially in the Bingley District (the latter being the first to provide a paper bin). The problem is supermarkets who aim to provide people with a reusable shopping bag, but do not enforce this as a necessity.
	Bradford Waste Disposal Authority (WDA)	No Comment.
	Environment and Waste Management Improvement Committee	<ul style="list-style-type: none"> ▪ No, even if a cheaper solution could well be purchase LATS (re: waste arisings, do we just dismiss agricultural waste in our forecast?)

FORECAST FUTURE WASTE ARISING		
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?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	All Categories of Waste. Allocations should be made for all waste types in order to realistically plan for the future.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	It is considered that CBMDC should prioritise, above other categories of waste, the allocation of suitable sites to deal with MSW and Commercial and Industrial (C&I) waste.
	Burley Parish Council	All Categories of Waste
	Bradford Wildlife Group	Domestic waste should be cut even further than at present by the removal of plastic containers from many items in supermarkets and to reuse their food waste in the right way thus reducing the necessity of more allocated sites. Education of the public and industry is the way forward.
	Bradford Waste Disposal Authority (WDA)	No
	Environment and Waste Management Improvement Committee	<ul style="list-style-type: none"> ▪ Only 50% of Bradford MDC's waste is MSW and CI waste. We cannot dismiss the balance

FORECAST FUTURE WASTE ARISING		
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?		
Rep ID	Name / Organisation	Summary of Representation
	Highways Agency	<p>It is stated in paragraph 4.4 that the growth in total waste arisings is just 4%, however, the numbers in Figure 10 show that there is a 14% growth in waste arisings forecast. Is this a typing error in paragraph 4.4 that should read 14%?</p> <p>The need for new waste management facilities in Bradford District</p> <p>It is stated in paragraph 4.10 that existing incidences of recycling and composting in Bradford stand at around 21% of total MSW generated for 2007/08. This would equate to around 55,000 tonnes currently being recycled. It is stated that by 2021 a minimum of 158,000 tonnes of MSW is required to be recycled. Paragraph 4.10 states that infrastructure to meet the minimum need for an additional 158,000 tonnes of MSW is required. However, in the previous paragraph it states that 55,000 tonnes of waste is currently being recycled. Therefore, is there only the need for an additional 103,000 tonnes?</p> <p>Also the last bullet point of paragraph 4.11 states that further capacity would be needed for 357,000 tonnes of C&I waste. If, of the forecast 649,000 tonnes, 214,170 tonnes goes to land fill and recovery capacity has been estimated at 78,000 tonnes, this results in capacity for 357,000 tonnes of waste required. Is there not already capacity for C&I waste in the district?</p> <p>The Agency would welcome the significant improvement in re-use, recycling and composting to be delivered through the PFI and the Waste Management DPD.</p> <p>As hazardous waste is not forecast to increase and if policies are in place that require the maximisation of on-site recycling and re-use of construction and demolition waste, which the Highways Agency would strongly support as this minimises the amount of potential HGV trips on the SRN, sites will just need to be allocated for Municipal Solid Waste (MSW) and Commercial & Industrial (C&I) waste.</p>
	Yorkshire Wildlife Trust	Just sites for MSW & C&I

Question 4: Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste) categories of waste?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	No Comment
	Yorkshire Wildlife Trust	No Comment Made
	Burley Parish Council	Don't know
	Environment Agency	
	Bradford Wildlife Group	We are a "throw away" society and this should be a way of thinking which should change. Unfortunately the economy is built upon it.
	Bradford Waste Disposal Authority (WDA)	Yes
	Environment and Waste Management Improvement Committee	<ul style="list-style-type: none"> ▪ No – see answer to Q.3

FORECAST FUTURE WASTE ARISING		
Question 5: Are the levels of waste to be planned for within the DPD realistic or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Burley Parish Council	All forecasts see an increase in waste should we not be aiming to reduce targets? Why is construction / demolition so high? Should not more recycling on site be carried out?
	Highways Agency	The forecasts of waste arisings have been 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 Humberside in 2007 (<i>Waste Arisings Forecast</i>). Analysis of the increase in households in the RSS (proposed changes) shows that the number of households in Bradford District is set to increase by around 19% between 2007 and 2021 taking the 2007 figures from Temprow version 5.4. Figure 10 shows that Municipal Solid Waste is set to rise by 21%. Therefore, this looks like a robust forecast.
	Yorkshire Wildlife Trust	If the message of 'reduce, re-use, recycle' is reinforced and sustainable systems are being followed then net MSW should be lower despite projected growth in population.

FORECAST FUTURE WASTE ARISING										
Question 5: Are the levels of waste to be planned for within the DPD realistic or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?										
Rep ID	Name / Organisation	Summary of Representation								
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	<p>It is appropriate that the starting point for the Waste Management DPD is to plan for the projected waste arisings for Bradford that are contained within the published RSS (the Yorkshire and Humber Plan, 2008) – in absence of CBMDC having its own, potentially more accurate, figures.</p> <p>The figures that are presented in the Issue and Options consultation document are taken from the previous draft of the RSS (the Secretary of State's Proposed Changes, 2007) and not from the final, published plan (the reason for this is unclear). The figures contained within the published Plan are as follows (MSW and C&I waste arisings, tonnes per annum for Bradford):</p> <table border="0"> <thead> <tr> <th><u>MSW</u></th> <th><u>C&I</u></th> </tr> </thead> <tbody> <tr> <td>2010 – 279,000</td> <td>2010 – 628,000</td> </tr> <tr> <td>2015 – 296,000</td> <td>2015 – 638,000</td> </tr> <tr> <td>2021 – 318,000</td> <td>2021 – 649,000</td> </tr> </tbody> </table> <p>These figures vary slightly from those contained within the draft plan (the MSW figures are slightly higher in the published version). It is these figures which it is considered should be referenced within the Waste Management DPD and which the CBMDC should use as a starting point to plan for waste management throughout the Plan period.</p> <p>As mentioned above (in response to Question 1) it will be relevant for CBMDC not simply to plan to manage all of the waste arising within the administrative area of Bradford but to consider that some of Bradford's waste is likely to be exported while waste from other neighbouring local authorities may be imported.</p> <p>Lastly, it is stated within the consultation document that it is intended the Waste Management DPD will cover a period of 15 years and it is anticipated that the DPD will be adopted in early 2011. In which case, there is a gap of 5 years where data on projected waste arisings is not available (i.e. the figures in the RSS only go up to 2021, where as the plan period is intended to reach up to 2026). How will the waste arisings for the last five years be projected? It is thought that the DPD should contain a projection for waste arisings throughout the Plan period (i.e. 2011 to 206) and also maintain capacity sufficient (i.e. at least 10 years of the annual requirement – see PPS 10 para.18) throughout the plan period.</p>	<u>MSW</u>	<u>C&I</u>	2010 – 279,000	2010 – 628,000	2015 – 296,000	2015 – 638,000	2021 – 318,000	2021 – 649,000
<u>MSW</u>	<u>C&I</u>									
2010 – 279,000	2010 – 628,000									
2015 – 296,000	2015 – 638,000									
2021 – 318,000	2021 – 649,000									

FORECAST FUTURE WASTE ARISING		
Question 5: Are the levels of waste to be planned for within the DPD realistic or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	The approach to forecasting is reasonable. As the document states, information on construction and agricultural waste is not so reliable and is also dependent on economic activity. We will keep you informed as new data becomes available.
	Bradford Wildlife Group	These are realistic. As a society we are producing more waste than is necessary. The education of the public, industry and the farming communities should be as essential plan forward. There is nothing in the Document concerning the education of the public.
	Bradford Waste Disposal Authority (WDA)	Concern over levels of waste predictions, this forecasting needs to be remodelled using more up to date values. It may be helpful to understand how other LPA's are forecasting waste growth.
	Environment and Waste Management Improvement Committee	<ul style="list-style-type: none"> ▪ Flexibility needs to be incorporated within DPD to accommodate change in levels of waste i.e. effect of more recycling, more regeneration.

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 of minimising waste arisings that the Council should promote in the DPD?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Co-Mingling collections and recycling.

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 of minimising waste arisings that the Council should promote in the DPD?

Rep ID	Name / Organisation	Summary of Representation
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	<p>CBMDC should encourage education initiatives which are aimed at improving public understanding of waste and resource management generally and which promote waste minimisation, reuse and recycling.</p> <p>Although most of the means by which this objective can be achieved fall outside the influence of the planning system, visitor/education centres for example can be provided alongside large scale waste recycling, recovery and treatment facilities, allowing the public access to appreciate and support sustainable forms of waste management.</p>
	Highways Agency	<p>The Highways Agency would support any planning approaches which assist in reducing waste arising. It is suggested that as C&I waste represents a large proportion (38%) of the total waste arisings in Bradford, the Council should consider encouraging small and medium sized enterprises in the application of waste minimisation processes and set an example by setting targets for in-house waste minimisation and recovery. A public information programme for environmental issues in general and waste management in particular. The Council could also set realistic disposal charges will be imposed which further waste minimisation objectives.</p>
	Yorkshire Wildlife Trust	<ul style="list-style-type: none"> • Education • Clear messaging • Community training/workshops • Directory/signposting of alternative waste disposal i.e. second hand furniture stores, local recycling centres (Orinoco, Oxford for e.g.), homeless shelters, composting schemes. • Charity run businesses adjacent to waste disposal sites where material which could be taken out of the waste stream is sold. There are a number of successful operations and apparently there is one at Kings Lynn.

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 of minimising waste arisings that the Council should promote in the DPD?

Rep ID	Name / Organisation	Summary of Representation
	English Heritage	Given the proportion of waste that comes from construction and demolition, the LDF, as a whole, should seek, in the first instance, to encourage the reuse and refurbishment of existing buildings. Only where this is clearly shown not to be feasible or to be the most sustainable option, would buildings be allowed to be demolished and the site redeveloped. Where demolition is allowed, provision should be made to reuse the materials wherever possible.
	Burley Parish Council	Reduction in packaging and encourage this at the national legislative level. Promote recycling e.g. cheap composting bins.
	Environment Agency	The council could promote sustainable construction through a Supplementary Planning Document. This document could flag the need for Site Waste Management Plans and good building design so as to encourage and facilitate waste segregation.
	Bradford Wildlife Group	As mentioned above to try and educate and encourage private companies etc to cut down their waste individually and industry.
	Bradford Waste Disposal Authority (WDA)	Over the full spectrum of planning development, waste prevention, re use, recycling needs to be considered as part of proposed development.
	Environment and Waste Management Improvement Committee	Yes. Dialogue with industry bodies (building / construction and highways / other councils).

REGIONAL AND NATIONAL POLICY		
Question 7: Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and reuse of waste?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	There needs to be flexibility in Bradford's attitude towards development of recycling facilities within worked out quarries albeit that they are often located in the Green Belt.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	The Highways Agency would always support the national and regional policy aspiration to maximise the recycling and re-use of construction and demolition waste. It would not encourage a departure from this policy aspiration as this could result in additional HGV movements on the SRN.
	Yorkshire Wildlife Trust	No Comment Made
	Burley Parish Council	No
	Bradford Wildlife Group	No
	Bradford Waste Disposal Authority (WDA)	No
	Environment and Waste Management Improvement Committee	No – firm commitment to national and regional policy

AGRICULTURAL AND 'OTHER' WASTE		
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?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	No Comment
	Yorkshire Wildlife Trust	Agricultural waste is frequently valuable for the production of methane
	Burley Parish Council	Yes
	Bradford Wildlife Group	No Comment Made
	Bradford Waste Disposal Authority (WDA)	Yes
	Environment and Waste Management Improvement Committee	Most definitely

ISSUE 1: INTERNAL WASTE MANAGEMENT		
Question 9: Which option or combination of options for Issue 1 are the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Bradford Waste Disposal Authority (WDA)	Issue 1 Accepting that Bradford has to become more self sufficient in waste provision, and also plan for the future, it must first aspire to option 5, after this option 1 and 2 will be needed. Option 3 may be of interest only if there are sound environmental, economic and employment benefits in dealing with waste imports.
	Environment and Waste Management Improvement Committee	No Comment Made

ISSUE 1: INTERNAL WASTE MANAGEMENT		
Question 9: Which option or combination of options for Issue 1 are the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	<p>It is thought that a combination of options one, two and three is preferable.</p> <p>Firstly, there is a need to safeguard existing waste management facilities that will continue to contribute significantly to waste management infrastructure in Bradford in the future. The inclusion of such facilities/sites within the Waste Management DPD should be conditional on the sites being appropriate in planning terms – i.e. in close proximity to urban areas, within 1km of the strategic highway network and not subject to significant environmental constraints (e.g. within the Green Belt or adjacent to a SSSI, etc).CBMDC should, in the first instance, seek to utilise the potential for developing existing waste management facilities and opportunities to develop these sites (e.g. to increase operational efficiency and/or to maximise opportunities for recycling and recovery of waste) should be supported. This has a number of benefits, such as:</p> <ul style="list-style-type: none"> ▪ Established waste management use (in planning terms); ▪ Established highway infrastructure and routing vehicles; ▪ Established facility for customers; ▪ Local acceptance of the site for waste management use; and ▪ Sustainable use of existing assets. <p>The document does not currently include provision for safeguarding (and, potentially, development) of suitable existing waste management sites but it is understood, from attendance at the Stakeholder Event held in Bradford on 8th December 2009, that it is intended the Waste Management DPD will do so.</p> <p>It is recognised that, in addition to developing/expanding existing facilities where possible (and appropriate in planning terms), there will be a need to allocate new sites for development in order to manage the waste arisings within Bradford and also (</p>

ISSUE 1: INTERNAL WASTE MANAGEMENT		
Question 9: Which option or combination of options for Issue 1 are the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Highways Agency	<p>The Highways Agency feels that in order to reduce the number of HGV movements on the SRN, Option 5, to minimise waste production/arising across the District through appropriate planning policies, therefore, minimising the site allocations required is important. However, there will still be a need to increase waste disposal within the District, particularly as currently a large proportion of waste is exported to other districts. All moves towards self-sufficiency will be welcomed and therefore the Agency would prefer Option 2 - providing additional sites and capacity to manage growing waste arisings in the District over Option 1. The Highways Agency does recognise that some waste will need to be transported across LPA boundaries to sub- regional facilities. However, there is the risk that there would be some impact on the SRN and therefore the Agency would only encourage Option 4 (working with adjacent authorities to identify appropriate sites) in order to identify sites in neighbouring authorities which are closer to the source if it had no impact on the SRN.</p> <p>In general, the Agency would not support Option 3 providing 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 as this could result in additional HGV trips on the SRN. The Agency would only have no objection if it would benefit a neighbouring authority without producing additional trips on the SRN.</p>
	Yorkshire Wildlife Trust	Options 4&5 offer the most sensible and sustainable solutions. Minimising waste should always be the main priority but where this has not been possible facilities should be located close to their source to reduce their carbon footprint.
	Burley Parish Council	Option 4 and 5
	Environment Agency	We support Bradford's commitment to take responsibility for its own waste by providing facilities within the district but would ask that development of waste capacity (both public and private) in other districts is kept in view so as to achieve the most sustainable solution.
	Bradford Wildlife Group	Option 1 and option 5 because there is not enough room in the District for additional sites and having to accommodate waste closely to the source could damage the environment.

Question 10: Assuming Options 2 and / or 3 are preferential, what type of facilities should be provided?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comments Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	It is thought that CBMDC should prioritise the development of large recycling, recovery and treatment facilities, preferably with a range of facilities co-located on one site, in close proximity to urban areas and within 1km of the strategic highway network. All of the above will help to ensure that the Council move towards more sustainable waste management solutions, with fewer waste miles travelled and movement of a significant proportion of Bradford's waste higher up the waste hierarchy.
	Highways Agency	No Comment
	Yorkshire Wildlife Trust	N/A
	Burley Parish Council	No Comment Made
	Bradford Wildlife Group	No Comment Made
	Bradford Waste Disposal Authority (WDA)	We should not try to limit technology choice but seek to embrace all of those technologies previously described.
	Environment and Waste Management Improvement Committee	Depends on the outcome of the PFI contract – however, Council may want to consider options that are linked to but not necessarily part of the eventual contract such as CHP.

Question 11: What other options should be considered?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	The Highways Agency believes that all of the options have been considered and that it is a combination of options which is required as discussed in our response to Question 9.
	Yorkshire Wild Trust	Increase recycling capacity or look to neighbouring LAs to accommodate increased recycling.
	Burley Parish Council	No Comment Made
	Bradford Wildlife Group	Simply increase capacity at existing sites and expect to send some waste to be managed outside Bradford.
	Bradford Waste Disposal Authority (WDA)	Waste minimisation policies
	Environment and Waste Management Improvement Committee	Energy from waste facilities not dismissed, subject to stringent environmental protection and with guarantees that recycling will be maximised rather than made subordinate to some extent to an Energy from Waste contract.

ISSUE 2: LOCATION OF WASTE SITES		
Question 12: Which option for Issue 2 is the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comments Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	It is considered that the most appropriate option for CBMDC, with regard to the management of MSW and C&I waste is to concentrate the development of waste management facilities (including residual waste treatment) in a small number of sites, strategically and appropriately located. It is likely that large scale, strategic waste treatment facility(s) should be supported by a range of other, smaller facilities (e.g. in the case of MSW this could include Bring Sites, Household Recycling Facilities and Transfer Stations).
	Highways Agency	The Agency would be happy to comment on the long list of sites at the appropriate time – we note that, in the Methodology Statement, that this list has been reduced to 65 sites. When would be the appropriate time to comment on these sites? The Highways Agency would prefer Option 2 as this would reduce the need to travel and hence potential HGV trips on the SRN.
	Yorkshire Wildlife Trust	A combination of Options 1 and 2. Smaller local sites are more sustainable and will be easier to decommission should less sites be needed in the future. Larger sites may be more appropriate for some types of infrastructure.
	Burley Parish Council	Option 2
	Environment Agency	The chosen solution must be the one that extracts the most value from waste and is also flexible enough to accommodate advances in technology and changes in waste composition.
	Bradford Wildlife Group	[Option 1 ticked] Concentration of a small number of sites is more environmentally acceptable. We do not have the room for a large number.

ISSUE 2: LOCATION OF WASTE SITES		
Question 12: Which option for Issue 2 is the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Bradford Waste Disposal Authority (WDA)	Issue 2 Site sizes/ capacity can vary from 0.5h to 10.0h easily, so providing for only a small number of strategic (large) sites seems inappropriate, can compromise to some extent on proximity principles and desires to concentrate traffic and potential polluting activities, thus selecting option 2 but including also larger strategic sites seems more realistic approach to cater for the differing waste streams.
	Environment and Waste Management Improvement Committee	Option 1 <ul style="list-style-type: none"> - more environmentally friendly - least public resistance - existing facilities <p><u>Additional comment:</u> environmental benefits depend to some extent on transportation issues (few sites mean more transport?) and the nature of the facility (very localised CHP plants may not be feasible, but other waste sorting centre might be).</p>

Question 13: Should different approaches be applied to different waste streams?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Yes – Green Waste recycling for instance should occur away from residential / industrial areas – it is best placed in the countryside which is likely to be in the Green Belt.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Yorkshire Wildlife Trust	No Comment Made

Question 13: Should different approaches be applied to different waste streams?		
Rep ID	Name / Organisation	Summary of Representation
	Burley Parish Council	Yes there may be economics of scale for some streams.
	Bradford Wildlife Group	I think these have to be in certain cases.
	Bradford Waste Disposal Authority (WDA)	Probably yes, as MSW treatment will require larger capacity facilities strategically sited.
	Environment and Waste Management Improvement Committee	Yes, depending on Q.12

ISSUE 2: LOCATION OF WASTE SITES		
Question 14: Are there any other options that should be considered for Issue 2?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Yes – Best solution is probably a combination of 1 + 2.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	No Comment Made

ISSUE 2: LOCATION OF WASTE SITES		
Question 14: Are there any other options that should be considered for Issue 2?		
Rep ID	Name / Organisation	Summary of Representation
	Yorkshire Wildlife Trust	Some mineral extraction sites may have very high potential for restoration to increase biodiversity and connectivity of habitat. To use such sites for landfill would be contrary to PPS9.
	Burley Parish Council	No Comment Made
	Environment Agency	The chosen solution must be the one that extracts the most value from waste and is also flexible enough to accommodate advances in technology and changes in waste composition.
	Bradford Wildlife Group	No Comment Made
	Bradford Waste Disposal Authority (WDA)	To combine both options.
	Environment and Waste Management Improvement Committee	Perhaps – for chemical / hazardous waste

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES		
Question 15: Which option is the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Must follow option 2 or opportunities to utilise worked out minerals sites will be lost or restricted mineral sites can only have been approved if they have no unacceptable impacts and thus are often well-suited for the establishment of waste management facilities.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	All sites (excluding those within the Green Belt and those which do not meet the minimum site size of 0.5 ha) should be tested. ETS supports CBMDC's approach, which is not to include any sites within the Green Belt unless an insufficient number of sites are identified as suitable in the area of search not within the Green Belt (this reflects national planning guidance and to adopt an alternative approach would be unsound).
	Highways Agency	The Highways Agency prefers Option 1, that sites in the Green Belt should not be considered. However, if a site outside the Green Belt would result in a significant number of HGV movements on the SRN, then alternative sites within the Green Belt should be considered.
	Yorkshire Wildlife Trust	There does not appear to be a criteria in the list of factors considered in para 5.10 to take account of biodiversity or the potential to enhance sites and increase habitat connectivity. A further option would be to exclude sites which if used would have a negative effect on biodiversity. Some brownfield sites in urban areas may be very biodiverse and valuable for wildlife and some sites in the green belt may not be so valuable.
	Burley Parish Council	Option 1. Option 2 if for very good reasons the first is not possible. Sites should be near where waste is generated.
	Bradford Wildlife Group	Option 1. We do not agree with new potential sites in the green belt. Development cannot take place within the green belt, so why should waste facilities be allocated. Many wildlife areas and sites of ecological importance are situated in the green belt.
	Bradford Waste Disposal Authority (WDA)	Issue 3 Would opt for option 2, to include very limited green belt to within say 1km of primary road network for limited waste management options (note comment in methodology statement 2.7), yet fully accepting the need for all other constraints also.

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES		
Question 15: Which option is the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Environment and Waste Management Improvement Committee	Option 1 – no green belt unless part of existing facility

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES		
Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comments Made
	Environment and Waste Management Improvement Committee	Yes (with some qualification, energy from waste not necessarily the first resort for waste management)

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES		
Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?		
Rep ID	Name / Organisation	Summary of Representation
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	<p>With regard to Figure 14 (Site Location Impact Criteria), it is considered there are flaws with the approach taken. The minimum site size values given for most of the facilities generally appear reasonable. However, the value given for in-vessel composting and anaerobic digestion is not particularly helpful (<2.5 ha) as it can be interpreted as a minimum site size of anywhere between 0 and 2.5 ha is required for these two technology types. The remainder of the assessment criteria (i.e. ‘creates air/noise/water pollution, etc.) are thought to be flawed, since arguably any/every waste management facility has the potential to give rise to impacts on the environment (depending on the specifics of the scheme and the site itself). Furthermore, no modern waste management facility, permitted by the Environment Agency, will be designed without effective pollution control/abatement technology. Lastly, surely it is preferable that all waste management facilities are developed in proximity to waste arisings (for sustainability reasons) and proximity to other facilities is, similarly, beneficial in all cases where there are process outputs/residues that need further management.</p> <p>It is not considered that this approach (i.e. trying to identify the impacts of different technology types in order to identify suitable/unsuitable sites for each specific type of technology) is necessarily the best. An alternative approach would simply be to assess the long list of sites in terms of key criteria, e.g.:</p> <ul style="list-style-type: none"> ▪ Proximity to urban areas; ▪ Proximity to strategic highway network; ▪ Physical constraints; ▪ Environmental constraints, etc. <p>Sites which have been assessed and do not meet the criteria can then be discounted and sites which do not meet the criteria can be put forward together with a note advising on the likely types of technology (broadly speaking) which would be suitable for development on a particular site (e.g. sites of .2.5 ha are likely to be suitable for a full range of technologies; sites with a particular constraint (e.g. residential properties with 250m) may be unsuitable for [say] windrow composting).</p>

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES		
Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?		
Rep ID	Name / Organisation	Summary of Representation
	Highways Agency	<p>The Methodology Statement states that only the short listed sites will be tested against the locational criteria not the long list as stated in Issue 4 Option 1. Will it be the long list of sites or the short list of sites which are tested against the locational criteria?</p> <p>One additional criterion should be impact on the SRN as a facility may be close to the waste arisings but still have impact on the SRN.</p>
	Yorkshire Wildlife Trust	See above, answer to question 15.
	English Heritage	<p>In some cases, a site would be so wholly contrary to national policy guidance that it should not be taken forward – no matter what it scores against other criteria. For example, a site which resulted in the destruction of a Scheduled Monument would wholly conflict with the advice in PPG 16 and, as a result, the site would unlikely gain consent – unless there were no other sites available.</p> <p>As part of this first sift of the long list, the cases where sites are so in conflict with national policy guidance should be able to be ruled out no matter what they score.</p> <p>Given the Council's stated intention that the LDF, as a whole, should deliver sustainable development, the waste strategy should include a category which scores the potential site to use a non-road distribution (i.e. rail, river or canal).</p> <p>It would be helpful to set out how it envisaged the likely effects upon the surrounding environment might be scored using the proposed matrix. One can envisage that sites may score well against one aspect (e.g. landscape) but poorly against another (e.g. biodiversity). In such a case, would the score for Surrounding Environment simply be averaged out? If so this could mask some areas where there are particularly harmful effects. In some cases the impact upon one aspect of the environment might be so severe that the score would be 0 no matter how high it scored against other elements of the environment. It may well be necessary to a further sift of sites to address this issue.</p>
	Burley Parish Council	Unable to comment

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES		
Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	<p>Any waste management facility would be subject to a permit under the environmental permitting regulations. The objective of the permit is to prevent harm to the environment or human health. For incinerators emission limits are set to comply with those in the Waste Incineration Directive which are based on World Health Organisation Standards. A permit would not be issued in a particular location if air quality standards would be breached as a result of the installation.</p> <p>Impacts can be considered in the context of the controls required by the permit:</p> <ul style="list-style-type: none"> • Emission limits for air (with an assessment against the Waste Incineration Directive), land and water. • An odour management plan • A noise assessment • A consideration of energy efficiency • A consideration of how to minimise waste produced and raw material used. • An Environmental Management System • An accident management plan • Requirement to use ‘Best Available Techniques’ to ensure compliance. <p>The Health protection Agency have issued guidance on the potential health effects of modern waste incinerators : Below is the first paragraph of the summary of the report ‘<i>The Impact on Health of Emissions to Air from Municipal Waste Incinerators</i>’ - Health Protection Agency - September 2009’</p> <p>‘<i>The Health Protection Agency has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health. While it is not possible to rule out adverse health effects from modern, well regulated municipal waste incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that modern and well managed municipal waste incinerators make only a very small contribution to local concentrations of air pollutants.</i>’</p>

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES		
Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	<p>We accept that permits cannot control the public's perception of how their quality of life is affected by a facility because the experience of odour or noise for example is personal. There may be no direct threat to health or environment but some people may still find the facility unacceptable. We would advise separating odour from air emissions as an impact, experience tells us that odour is the most common cause of complaint and has to date been more of a problem with technologies designed to handle large quantities of mixed biodegradable waste.</p> <p>Proximity to markets/uses for heat or recycle should be considered when assessing sites for locating waste management sites. The closer the end user of any heat or recycle the more sustainable the transaction to the end user.</p> <p>There is no specific criterion for flood risk. Please see the section at the end of this letter on the requirements of PPS25: Development and Flood Risk.</p>
	Bradford Wildlife Group	<p>Appendix 1 – S/E1.6. John Escritt Road: This is not advisable to place on this list. Too near Bingley South Bog SSSI. Not advisable for Waste facilities.</p> <p>Sites should not be allocated in sensitive Ecological Areas. List needs to be checked out with sensitivity in mind.</p>
	Bradford Waste Disposal Authority (WDA)	<p>Comment on the location criteria etc already made above.</p>

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE		
Question 17: Which option do you consider the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	<p>Option 1 initially appears to be sensible but only really applies to large demolition projects. The bulk of C&D waste still comes from a plethora of small sites where on-site recycling is impractical and unacceptable.</p>

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE		
Question 17: Which option do you consider the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	The Agency would encourage Option 1, the maximisation of on-site recycling and re-use of construction and demolition waste to minimise waste arisings. However, it does recognise that there may still be a need to dispose of some waste off site, therefore would welcome the criteria based approach for locating new expanded waste management facilities as long as it includes a criterion relating to impact on the SRN.
	Yorkshire Wildlife Trust	Option 1.
	Burley Parish Council	Option 1
	Environment Agency	We agree that the first priority is to reduce and reuse construction waste on site through the use of sustainable construction methods and site waste management plans. A building materials reuse infrastructure should be encouraged - some councils are considering building material 'shops' at civic amenity sites. Reuse and recycling on site is the most sustainable option but sometimes this is not viable on smaller construction sites. Lots of unsorted builders waste is still landfilled and it is widely fly tipped. In order to increase recycling and reduce fly tipping we would advocate some offsite provision for small builders.
	Bradford Wildlife Group	[Option 1 ticked on form] Recycling and reuse ideally should be done on site if possible.
	Bradford Waste Disposal Authority (WDA)	Preference is for option 3 as this seems the most flexible and complete position.

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE		
Question 17: Which option do you consider the most appropriate and why?		
Rep ID	Name / Organisation	Summary of Representation
	Environment and Waste Management Improvement Committee	Option 1

Question 18: Are there any other options that should be considered?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	C&D waste recycling and disposal facilities can be located in disused (and indeed some active) quarries. Policies should not dismiss this option.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	No Comment
	Yorkshire Wildlife Trust	No Comment Made

Question 18: Are there any other options that should be considered?		
Rep ID	Name / Organisation	Summary of Representation
	English Heritage	<p>As set out in our response to Question 6, in order to reduce the amounts of construction and demolition waste, the LDF needs to start from the principle that the most sustainable strategy is to reuse/adapt the existing building stock. Clearly there will be cases where this is either impracticable or can be shown not to be the most sustainable option. In such cases, demolition of the building would be permitted. However, the Plan should seek to reuse the materials especially those, such as dressed stone and roofing slates, which are typically used within the District's settlements and can help reduce the need for extraction of building stone.</p> <p>Only where such materials cannot be reused for building, should they be allowed to be crushed as aggregate or hardcore. This approach might be able to be pursued through though Conditions on Planning Approvals and the plan may need to make provision for the establishment of facilities to recycle such buildings materials.</p>
	Burley Parish Council	No Comment Made
	Bradford Wildlife Group	No Comment Made
	Bradford Waste Disposal Authority (WDA)	No Comment
	Environment and Waste Management Improvement Committee	Option 3

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS

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

Rep ID	Name / Organisation	Summary of Representation
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ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS		
Question 19: Which option do you consider the most appropriate for Issue 6 and why?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	The option 1 scenario is covered in negative comments. Hazardous waste arisings should, wherever practical / possible, be dealt with within the district and not transported vast distances.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	The Agency does not have a favoured option but would like to have an opportunity to be consulted in future on locations of potential new sites for managing hazardous waste.
	Yorkshire Wildlife Trust	No Comment Made
	Burley Parish Council	Option 3
	Bradford Wildlife Group	Option 2. How much hazardous waste are we producing and will produce in future? Can it not be cut down.

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS		
Question 19: Which option do you consider the most appropriate for Issue 6 and why?		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	<p><i>Hazardous waste</i></p> <p>Planning provision for hazardous waste management is likely to benefit from regional consultation and consultation with neighbouring authorities. Sites for a proposed hazardous waste facility would be subject to rigorous environmental risk assessments before a permit could be granted. This should be borne in mind when proposing sites for hazardous wastes.</p> <p><i>Agricultural waste</i></p> <p>We agree that criteria based policies would be better for agricultural waste. We have little reliable data on agricultural waste but anecdotally our feeling is that some types of agricultural waste are being dealt with on farms and that there is increasing interest in anaerobic digestion and composting for dealing with slurries and vegetable waste, on a relatively small scale. Criteria based policies which recognise the impacts of these types of technologies would prove useful.</p> <p>Other types of agricultural waste such as packaging, scrap metal and construction waste are more likely to be dealt with off farm as commercial industrial waste.</p>
	Bradford Waste Disposal Authority (WDA)	<p>Issue 6</p> <p>Option 2 – the small values of hazardous wastes and the many varying types of specialised treatments required makes new site identification as suggested in option 1 inappropriate.</p>
	Environment and Waste Management Improvement Committee	<p>Option 3 – need a policy for all types of waste (could be a combination of 1 and 3?)</p>

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?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No – There may be a need for new facilities. Not all farms are suitable for disposal at the point of origin.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	No Comment
	Yorkshire Wildlife Trust	This is the practice that is promoted to farmers under the GAEC requirements of the CAP.
	Burley Parish Council	It is certainly desirable
	Bradford Wildlife Group	Yes. It is appropriate.
	Bradford Waste Disposal Authority (WDA)	Yes
	Environment and Waste Management Improvement Committee	No – policy must be in situ – policy not left to be abused. Council needs to be proactive in this area

Question 21: Should the DPD consider any other types of waste?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Yes – Green Waste
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Highways Agency	No Comment
	Yorkshire Wildlife Trust	No Comment
	Burley Parish Council	No Comment Made
	Bradford Wildlife Group	I think the DPD has listed most of the waste “Streams” affected.
	Bradford Waste Disposal Authority (WDA)	No
	Environment and Waste Management Improvement Committee	Without a doubt – we need to control all waste generated

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE		
Question 22: Which option do you consider the most appropriate for Issue 7 and why?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	Option 1 – Encourages Fly Tipping Option 2 – Best Option Option 4 – Unsustainable due to excessive transport distances.
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	It is understood, from attending the Stakeholder Event held in Bradford on 8 th December 2009 that, in relation to Issue 7, the term 'residual waste' is taken to mean the very last proportion of the waste (i.e. post recycling/recovery/treatment, etc) and an example of this is the ash from an Energy-from-Waste (EfW) facility. It does not mean, for example, the residual MSW that remains after kerbside recycling. This is not currently clear in the document. Generally speaking, residual waste facilities should be located near the source of the waste (co-located if at all possible). An example of this is an incinerator bottom ash processing facility located on the same site or adjacent to an EfW or wastewater treatment facility located on the same site or adjacent to an Anaerobic Digestion (AD) facility.
	Highways Agency	Option 4 is the least preferable of the options for the Agency, but recognises the need for a transition period in moving from reliance on external sites to a high level of self-sufficiency.

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE**Question 22: Which option do you consider the most appropriate for Issue 7 and why?**

Rep ID	Name / Organisation	Summary of Representation
	Steve Gibbs - The Arley Consulting Company Limited on behalf of P Casey (Enviro) Ltd (PCE)	<p>Option 1</p> <p>PCE support the principal of the waste hierarchy, and recognise that landfill is at the foot of the hierarchy. Nevertheless, as para 5.42 recognises, it is likely that some residual waste will remain to be landfilled.</p> <p>We would have thought that the encouragement of movement up the hierarchy through alternative technologies is more properly a matter for the Core Strategy, for which the Preferred Option consultation is not yet available.</p> <p>Option 1 suggests “limiting landfill capacity”, which we assume would reinforce any positive support for the other technologies.</p> <p>The question is, then, how to match availability with need.</p> <p>The need for landfill is likely to vary both with progress in the provision of the other technologies, and the quantitative and qualitative suitability of the wastes for treatment. The latter are likely to vary according to development of the economy, technology and legislation.</p> <p>Landfill can provide a robust final disposal option that is less sensitive to changes in waste quantity band composition than other options.</p> <p>The availability of landfill is difficult to control. The overall capacity of a landfill is largely determined by site-specific factors. The rate of release of that capacity is usually determined by factors such as traffic impacts or operational capacity of site plant.</p> <p>To attempt to control the rate of release (annual input) for policy reasons may risk the landfill being uneconomic to operate, as many costs are fixed.</p> <p>Whilst Option 1 is superficially attractive in policy terms, PCE wish to see much greater detail of the mechanisms for limiting capacity.</p> <p>Option 2</p> <p>It follows from our views on Option 1 that we consider that landfill capacity should be provided within the District.</p> <p>Option 3</p> <p>The combination of options is reasonable in policy terms subject to the mechanism for limiting capacity. We would be open to discussion as to how capacity could be limited so as not to prejudice the waste hierarchy.</p> <p>Waste Management DPD: Issues and Options – Norcroft Centre, Bradford (8th December 2009)</p>

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE		
Question 22: Which option do you consider the most appropriate for Issue 7 and why?		
Rep ID	Name / Organisation	Summary of Representation
	Steve Gibbs - The Arley Consulting Company Limited on behalf of P Casey (Enviro) Ltd (PCE) continued.	<p>Option 4</p> <p>We consider that the proximity principle clearly favours the provision of capacity in the District, and Bradford's emerging Core Strategy Vision also clearly favours this. Our reading of the Consultation paper is that the Council continues to rake this view – for example, paras 1.2, 1.4, and 2.7.</p> <p>It is unlikely that all areas will be equally able to provide landfill capacity, and therefore to use up the sub-regional capacity without assurance that all authorities would then be equally able to replace it on a self-sufficient basis is unacceptable.</p> <p>For the reasons stated above, PCE prefer Option 2, but Option 3 could be acceptable subject to the mechanism of capacity limitation.</p>
	Yorkshire Wildlife Trust	Option 1. This would send out a robust message to the public and encourage a concerted effort to reduce waste.
	Burley Parish Council	Option 1
	Bradford Wildlife Group	Option 1. The other options advice that we cannot cut down our waste and it will increase over the years. Since the Council's intention is to send less.
	Bradford Waste Disposal Authority (WDA)	Option 1 would seem the most appropriate in having policies to reduce waste/residual wastes, but recognising that most waste treatment technologies will only divert between 80-95% of input away from landfill, leaving some of the residual still biologically active, but having no other practical economic means of disposal other than landfill. (See comment in Question 1 on sub regional landfill capacity and need to export residue to landfill). There should be consideration for an Option 1 + 4 in combination for Question 22.
	Environment and Waste Management Improvement Committee	Option 1. We must limit the easy option of falling back on landfill. Landfill is no longer a policy option that we can tolerate if alternatives can be found to deal with our waste.

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE		
Question 22: Which option do you consider the most appropriate for Issue 7 and why?		
Rep ID	Name / Organisation	Summary of Representation
	Environment Agency	<p>There is certainly still scope for reducing the amount of 'residual waste' which needs to be dealt with. Plans are in place to increase recycling of MSW. The position with Commercial Industrial and Construction waste however is less clear. The first step should be to ensure that all waste is treated as far up the hierarchy as possible, and that as much as possible is reused or recycled.</p> <p>An emerging issue over the past 12 months has been the disposal or further treatment of the outputs from Mechanical Biological Treatment and Autoclave type facility commonly referred to as Compost Like Output or in some cases Refuse derived Fuel. These outputs remain waste and as such require waste permits for their onward treatment or disposal. They cannot be spread to land without authorisation or burned for energy except in a Waste Incineration Directive compliant incinerator.</p> <p>There is a need to plan for productive outlets for these residual wastes, alongside the proposals for initial treatment.</p> <p>Landfill is a last resort and any requirement for further capacity should be assessed on this basis.</p>

Question 23: For Issue 7 Option 2, should additional capacity be identified in existing or new sites?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comment Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made

Question 23: For Issue 7 Option 2, should additional capacity be identified in existing or new sites?		
Rep ID	Name / Organisation	Summary of Representation
	Steve Gibbs - The Arley Consulting Company Limited on behalf of P Casey (Enviro) Ltd (PCE)	The key factor in identifying additional capacity must be the suitability of the candidate sites.
	Highways Agency	The Agency would welcome the consideration of new sites if these were located closer to the point of source and therefore reduced the impact on the SRN.
	Yorkshire Wildlife Trust	No Comment Made
	Burley Parish Council	No Comment Made
	Bradford Wildlife Group	Waste to landfill sites options 2 and 4 contradict this aspiration.
	Bradford Waste Disposal Authority (WDA)	As Bradford doesn't have much landfill capacity (zero for active wastes?) any additional capacity will probably be new capacity if it is to be provided within the district (see response in Question 22).
	Environment and Waste Management Improvement Committee	Only in existing sites

Question 24: Are there other options that should be considered for Issue 7?		
Rep ID	Name / Organisation	Summary of Representation
	Mr Martin Millmore – Minerals Planning Group	No Comments Made
	Imogen Scotney – Scott Wilson on behalf of Earth Tech and Skanska (ETS)	No Comment Made
	Steve Gibbs - The Arley Consulting Company Limited on behalf of P Casey (Enviro) Ltd (PCE)	We can see no other options.
	Highways	No Comment
	Yorkshire Wildlife Trust	As a nation we should be looking to other EU states who are managing their waste more effectively.
	Burley Parish Council	No Comment Made
	Bradford Wildlife Group	<p>The way forward is surely:</p> <ol style="list-style-type: none"> 1. Waste prevention – educate public etc. 2. Reuse “ “ “ 3. Recycle - & compost “ “ “ 4. Although we do not have the room for more landfill sites – Some that are in use should be restored to a natural landscape for encouraging Biodiversity. 5. Try some alternative technologies and Biological Treatment

Question 24: Are there other options that should be considered for Issue 7?		
Rep ID	Name / Organisation	Summary of Representation
	Bradford Waste Disposal Authority (WDA)	Option 1 + 4 combined.
	Environment and Waste Management Improvement Committee	No

RESPONSE TO CALL FOR SITES			
Rep No.	Consultee	Site	Location
	Mr Martin Millmore – Minerals Planning Group	Hallas Rough Quarry	Adjacent to the A629 Halifax Road 1km to the south west of the village of Cullingworth.
	Mr Damien Walsh	Associated Waste Management Limited Victoria Works	Barnard Road Bradford BD4 7DY
		AWM at Canal Road	Canal Road Shipley BD2 1AU
		Hardcore Recycling	Hammerton Street Bradford
		Scrap yard	Corner of Shipley Fields Road and Canal Road Shipley BD2 1AU
	P. Casey	Buck Park Quarry	Whalley Lane Denholme Keighley
	Aire Valley Environmental	Esholt WwTW. Additional information supplied for original sites of Ref: 123 + 124 Esholt Sewage Treatment Works.	Esholt Bradford National Grid Reference 4193, 4390

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1.0 APPENDIX 1 - PETITION

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Memo

To: Ian Bairstow
Strategic Director
Environment & Neighbourhoods
Jacob's Well

Legal and Democratic Services

Committee Secretariat
City Hall
Bradford
BD1 1HY

C. Haworth

4214

From:

Tel: (01274) 432269
Fax: (01274) 728260
My Ref: 443
Email: Palbinder.sandhu@bradford.gov.uk

Your Ref:

Date: 14 January 2010

SUBJECT: PETITION TO REMOVE THE SITE AT CANAL ROAD, BOLTON (BN/E1.15) FROM THE LONG LIST OF POSSIBLE SITES FOR WASTE DISPOSAL

I attach for your attention an original petition on the above matter that was received by Committee Secretariat on 14 January 2010 via Councillor Gray.

In line with the petitions protocol, I would be grateful if you could write to the lead petitioner; Ms B Ross, 8 Kingsley Avenue, Bradford, BD2 1DP, indicating a named senior officer dealing with the petition. You should also ensure that the petitioners will be contacted again within three weeks of your first letter to let them know what is to be done with the petition.

Enc

This needs to go to Boma, it is listed to the consultation on the waste DPD



2008-2009
Inspiring All and Services
Empowering Communities



Suzan Hemingway, Assistant Director Corporate Services (City Solicitor)



J.P.D.

Petition.

We the undersigned petition Bradford Council to remove the site at Canal Road Bolton (BN/E1.15) from the long list of possible sites for waste disposal

Signature	Name	Address (including e mail)
	BENITA ROSS	8 KINGSLEY AVE BD2 1DP
	Janette Jones	10 KINGSLEY AVE BD2 1DP
	JOHN JONES	" " "
	MICHAEL OVAR	12 KINGSLEY AVENUE, BRADFORD, BD2 1DP
	ANNA OVAR	" " " "
	SHARON BERRY	14 KINGSLEY AVE. BD2 1DP
	VICKI BERRY	14 Kingsley Ave BD2 1DP
	CHRIS BERRY	14 KINGSLEY AVE BD2 1DP.
	KARL DOWNEY	16 KINGSLEY AVE BD2 1DP
	CHERYL LONGSTAFF	16 KINGSLEY AVE BD2 1DP
	KAREN DOWNEY	6, Kingsley Ave BD2 1DP
	STEPHEN DOWNEY	6 KINGSLEY AVE BD2 1DP.
	STUART ROSS	8 KINGSLEY AVE BD2 1DP
	Teresa Keach	7 Dockfield Road. BD11 7AD.
	David Keach	— — —
	Gareth Keach	— — —
	M MILLER	21, KINGSLEY AVENUE
	N BERGS	12, BOLTON LANE BD2
	JWARD	1, SUFFERE PLACE, BRADFORD
	A WARD	" "
Please return to: Ms B Ross. 8 Kingsley Avenue Bradford as soon as possible		

Petition.

We the undersigned petition Bradford Council to remove the site at Canal Road Bolton (BN/E1.15) from the long list of possible sites for waste disposal

Signature	Name	Address (including e mail)
	Mohammed Saeed	20 Kingsley Ave. BD2 1DP
	RAAZIA SAEED	20 Kingsley Ave. BD2 1DP
	B. MORTON	13 Kingsley BD2 1DP
	C WILDE	28 Kingsley Ave BD2 1DP
	E. Oates	34 Kingsley Ave BD2 1DP
	D.P. CHATER	34 Kingsley Ave BD2 1DP
	S BANKS	29 KINGSEY AVE BD2 1DP
	S BANKS	" " " "
	D Banks	" " " "
	MICHAEL BILLINGTON	36 KINGSEY AVE BD2 1DP
	SUE BILLINGTON	" " " "
	CHRISTOPHER BILLINGTON	" " " "
	M. BRAYSHAW	38 Kingsley AVE, BD2 1DP
	M.G. Brayshaw	" " " "
	J. Jones	37, Kingsley Ave
	Chris	31, Kingsley Avenue
	D. WORTH	25, Kingsley Ave.
	T. JAMES	33 Kingsley Ave
	F. USMAN	" " " "
	(Sent) J. Jones	10 Kingsley Avenue,
<p>Please return to: Ms B Ross. 8 Kingsley Avenue Bradford as soon as possible</p>		

Petition.

We the undersigned petition Bradford Council to remove the site at Canal Road Bolton (BN/E1.15) from the long list of possible sites for waste disposal

Signature	Name	Address (including e mail)
	M. LIVERETT	8. HODGKIN PLACE BFD
	S BROOK	10 THORNACRE CRESENT.
	E BROOK	10 THORNACRE CRESENT
	M LIVERETT	8 LADRE PLACE BFD
	ALAN SCOTT	8 Stonebridge, Zulcroft Rd BD10
	D. PHILLIPS	23 Westgate Eccleshill BD2
	P JENNINGS	30 LISTER LANE BD2 4LZ
	R Firth	3 EXMOOR PLACE BOSWELL
	J. BRADBENT	31 Falsgrave Ave BD2
	M. BRADBENT	" " "
	K. TURNER	5 BRAE AVENUE BRADFORD
	I. STANFIELD	5 BRAE AVE BRADFORD
	I. DIXON	323 KINGS RD
	B. DIXON	" " "
	B.W. DIXON	" " "
	M. ZACCARDINI	3. WOOD LANE
	L. MCCORISTON	321 KINGS RD
	C. CAIRNS	" " "
	M. STAN	10 WAPPING ROAD BD30EQ
	ANTONETTE	37, Wapley Avenue
Please return to: Ms B Ross. 8 Kingsley Avenue Bradford as soon as possible		

Petition.

We the undersigned petition Bradford Council to remove the site at Canal Road Bolton (BN/E1.15) from the long list of possible sites for waste disposal

Signature	Name	Address (including e mail)
	VERA MAKIN	10 BOLTON LANE BD2 1DR ^{DOUGERAMAKIN@ACTIVE MAIL . CO . UK}
	DOUGLAS MAKIN	11 " " ^{DOUGERAMAKIN@ACTIVE MAIL . CO . UK}
	JASWINDER SINGH	15 BOLTON LANE BD2 1DR ^{Jazman2002@yahoo.co.uk}
	Gurdip Singh	6 BOLTON Lane BD2 1DR
	B CROWTHER	17 BOLTON LANE BD2 1DR
	J. CROWTHER	17 BOLTON LANE BD2 1DR
	L. Adams	19 BOLTON Lane BD2 1DR
	B ADAMS	19 BOLTON LANE BD2 1DR
	SMDRIZ ZAMAN	21 BOLTON LANE BD2 1DR
	EMMA GOMERSALL	25 BOLTON LANE BD2 1DR
	LESLEY THORPE	27 BOLTON LANE BD2 1DR
	JOHN THORPE	27 BOLTON LANE BD2 1DR
	NAFIA ALAM	20 BOLTON LANE BD2 1DR
	JOANNE DENNIS	31 Bolton lane BD2 1DR
	ROYCE LAZDINS	18 BOLTON LANE BD2 1DR
	ROLAN LAZDINS	18 BOLTON LANE BD2 1DR
	Sabiha Khan	14 BOLTON LANE BD2 1DR
	Craig Stringer	8 Bolton lane BD2 1DR ^{stringercraig@hotmail.com}
	Sylvia Dawkins	16 BOLTON LANE BD2 1DR
	Chelsie Hoggarth	29 Bolton Lane BD2 1DR
Please return to: Ms B Ross. 8 Kingsley Avenue Bradford as soon as possible		

Petition.

We the undersigned petition Bradford Council to remove the site at Canal Road Bolton (BN/E1.15) from the long list of possible sites for waste disposal

Signature	Name	Address (including e mail)
[Redacted]	A.W. JOHNSTON	23 KINGSLEY AVE (SF) 2
[Redacted]	A. JOHNSTON	" " " " " "
[Redacted]	N. MALIK	9 KINGSLEY AVE BD2 1DP
[Redacted]	M.A. MALIK	" " " "
[Redacted]	Mushraf RIAZ	7 KINGSLEY AVE, BD2 1DP
[Redacted]	D. MUSHARAF	" " " " "
[Redacted]	SAIRA DAR	348 Killinghall Road BD24 5F
[Redacted]	[Signature]	9 Kingsley Avenue
[Redacted]	JAMIE FULLER	4 KINGSEY AVENUE
[Redacted]	FRANS	2 " "
[Redacted]	KULVIR SINGH	" "
[Redacted]	[Signature]	" "
[Redacted]	JIBARRON	3 KINGSLEY AVE
[Redacted]	S BERRY	3 KINGSLEY AVE
[Redacted]	[Signature]	18 KINGSLEY AVENUE
[Redacted]	S. AHMED	18 KINGSLEY AVENUE
[Redacted]	S. Gill	17 Kingsley Ave.
[Redacted]	T. Gill	17 Kingsley Ave.
[Redacted]	Scott Humble	17 Kingsley Ave.
[Redacted]	STUART ROSS	8 Kingsley Ave BD2 1SP
<p>Please return to: Ms B Ross. 8 Kingsley Avenue Bradford as soon as possible</p>		

Petition.

We the undersigned petition Bradford Council to remove the site at Canal Road Bolton (BN/E1.15) from the long list of possible sites for waste disposal

Signature	Name	Address (including e mail)
	K-NOVAK	27 Kingsley Ave BD2 1 DP
	R. NOVAK.	u
	Mr SM Ali	22 Kingsley Ave - BD2 1DP
	Minara Bari	22 Kingsley Ave Bd2 1dp
<p>Please return to: Ms B Ross. 8 Kingsley Avenue Bradford as soon as possible</p>		

2.0 APPENDIX 2 – DISTRIBUTION LIST

LIST OF SPECIFIC STATUTORY CONSULTEES

Statutory and Specific Consultation Bodies and Infrastructure Organisations:

- British Telecom
- English Heritage
- Environment Agency
- Government Office for Yorkshire and Humber
- Highways Agency – Yorkshire & Humber
- Local Government Yorkshire & Humber
- Natural England
- Natural England – West Yorkshire Team
- Network Rail
- North West Regional Assembly
- North West Regional Development Agency
- Telewest Communications
- Transco (North of England)
- Yorkshire Electricity
- Yorkshire Forward Regional Development Agency
- Yorkshire Water Services Ltd

Adjoining Local Planning Authorities:

- Calderdale Metropolitan District Council
- Craven District Council
- Harrogate District Council
- Kirklees Metropolitan District Council
- Lancashire County Council
- Leeds Metropolitan District Council
- North Yorkshire County Council
- Pendle Borough Council
- Wakefield Metropolitan District Council

Bradford Council Elected Members:

- 90 Councillors
- 5 MP & MEPs in Bradford, Shipley and Keighley Constituencies

Town and Parish Councils in Bradford

District:

- Addingham Parish Council
- Baildon Parish Council
- Burley Parish Council
- Clayton Parish Council
- Cullingworth Parish Council
- Denholme Town Council
- Harden Parish Council
- Haworth, Cross Roads & Stanbury Parish Council
- Ilkley Parish Council
- Keighley Town Council
- Menston Parish Council
- Oxenhope Parish Council
- Sandy Lane Parish Council
- Silsden Town Council
- Steeton with Eastburn Parish Council
- Wilsden Parish Council
- Wrose Parish Council

Town and Parish Councils in

Neighbouring Local Authorities:

- Bradleys Both Parish Council
- Cononley Parish Council
- Cowling Parish Council

- Denton Parish Council
- Draughton Parish Council
- Drighlington Parish Council

- Farnhill Parish Council
- Gildersome Parish Council
- Glusburn Parish Council
- Laneshaw Bridge Parish Council
- Middleton Parish Council
- Nesfield with Langbar Parish Council
- Otley Town Council
- Sutton-in-Craven Parish Council
- Trawden Forest Parish Council
- Wadsworth Parish Council
- Weston Parish Council

LIST OF SPECIFIC CONSULTEES – ASSOCIATED WASTE INDUSTRY PARTIES

- Abitibibowater
- Advanced Plasma Power
- Aire and Calder Rivers Group
- Aire Valley Conservation Society
- Airedale Partnership
- Albion Environmental Limited
- AmeyCespa
- Apperley Bridge Development Residents Association
- Ascot Environmental Ltd
- AWM Ltd
- Babcock & Brown
- Baildon Community Council
- Bank of Ireland
- Bank of Scotland Corporate
- Barclays Asset Finance
- Barhale Construction PLC
- Beckside Works
- Bedminster International
- Berwin Leighton Paisner LLP

- Biffa Waste Services
- Bingley Environmental Transport Association
- Bioganix Ltd
- BioGen Power
- Birse Process Engineering Ltd
- BOCS
- Bolton Woods Community Association
- Bradford & District Chamber of Trade
- Bradford Business Link
- Bradford Centre Regeneration
- Bradford Chamber of Commerce & Industry
- Bradford Community Environment Project
- Bradford Hospitals NHS Trust
- Bradford Organics Collection Scheme
- Bradford Ornithological Group
- Bradford Teaching Hospital Trust
- Bradford Ramblers Association Group
- Bradford University
- Bradford Urban Wildlife Group
- British Waterways
- Burges Salmon
- Burley Community Council
- CABA
- Catalyst Lend Lease
- CBMDC – Environmental Protection
- Cemex UK
- Clarke Energy
- CNIM UK
- Comex Environmental Limited
- Community Waste Ltd
- Cory Environmental
- Costain Ltd
- Covanta Energy Ltd
- CPRE Bradford District
- CPRE West Yorkshire
- Cranmore Farm

- Cyclerval
- DCT Civil Engineering Ltd
- DEFRA
- Deloitte and Touche
- Denholme Residents Action Group
- Dexia Public Finance Bank
- Donarbon Ltd
- Doric Energy
- Earth Tech UK
- ECS Engineering ServicesLtd
- Eco Ltd
- Elliniki Technodomiki
- ENERGOS
- ENER-G PLC
- Enpure
- Entec UK Ltd
- Environmental Waste Controls Ltd
- Estech Europe Limited
- Euclid Infotech
- Excelar Resource ltd
- Fairport Engineering Ltd
- Fagley Lane Action Committee
- Fagley Tenants & Residents Association
- Fernwood waste Recycling
- Fortis Bank
- Future Energy Yorkshire
- Gleeds
- Global Renewables
- Graphite Resources Limited
- Greenfinch Ltd
- GVA Grimley
- Harden Village Society
- Hills Waste Solutions Ltd
- Hotrot Composting
- H W Martin Waste Ltd
- Inland Waterways Association

- Interserve Project Services Limited
- JN Bentley
- John Laing
- Kelda Water Services Limited
- Kier Group
- Kier Construction Limited
- KPMG
- Laing O'Rourke Integrated Solutions
- Leeds Environmental Organisation Ltd
- Leeds Friends of the Earth
- Leeds/Bradford International Airport
- May Gurney Ltd
- Mott MacDonald
- MWH Global
- National Farmers Union
- NBC Project Development GmbH&Co.KG
- New Earth Composting
- New Earth Solutions Ltd
- Nord LB
- Novera (Gasification)
- Novera Energy Plc
- Npower Renewables
- Oaktech Environmental
- OAPL
- Orchid Environmental
- PHS Group Ltd
- Pickford Contracting Ltd
- PPS Recovery Systems Limited
- Premier Waste Management Ltd
- Railtrack Property
- Ramblers Association
- RBC Capital Markets
- Reliant Technical Services
- Renewables Developer
- RSPB (Northern England region)
- Scot Gen (Gasification Systems)

- Schofield Sweeney
- Scottish & Southern Energy
- Scott Wilson Ltd
- Shanks
- Shephard Engineering Services
- Sita Uk
- Skanska Infrastructure Development
- SLR Consulting
- SSE
- Sterecycle
- Sumitomo Mitsui Banking Corporation
- TEG Environmental Ltd
- Tetronics Ltd
- The City Centre Project
- Thetford International Products
- Tradebe Ltd
- Trading Pictures
- Trident
- T Shea and Sons
- Urbaser LTD
- United Utilities Business Development & International
- Veolia Environmental Services (UK)
- Viridor
- Vital Earth Derby Ltd.
- VT Group
- Walker Morris
- Waste Recycling Group
- Waste Research Limited
- West Yorkshire Archaeology Advisory Service
- West Yorkshire Ecology
- Whitebay Ltd
- Yorkshire Planning Aid
- Yorkshire Wildlife Trust
- Yorwaste Ltd

LIST OF SPECIFIC CONSULTEES - WASTE SITE OPERATORS

- Associated Waste Management Limited
- Autospares Bingley Limited
- Berry And Marshall (Bolton Woods) Limited
- Bradford Organic Composting Scheme
- Bradford Waste Traders
- CBMDC – Department of Regeneration (Dockfield Road)
- Dennis Gillson And Son (Haworth) Limited
- Dial A Skip Service Limited
- George M Watson (Construction) Limited
- Gill Demolitions
- GW Butler Limited
- Harry Sanders Ltd
- John Hornby And Sons Limited
- Leeds Environmental Organisation Limited
- Miles J Delaney
- Mineral Resources (Yorkshire) Limited
- Mr Bryan Scott
- Omega Proteins Ltd
- P Waddington And Sons Ltd
- Skipton Properties
- Thomas Crompton Developments Ltd
- University Of Bradford - Estates And Facilities
- West Riding Crushing Services
- West Riding Waste Disposal Limited
- Yorkshire Poultry Products
- Yorkshire Water Services Ltd

Notification List

	Name and Address	
	Mr Matt Olley Regional Planner Countryside Properties (Northern) Ltd	
	Mr Jim Smith Group Asset Manager	

	Name and Address	
	Group Asset and Development Team Bradford Community Housing Trust	
	Mr Mike Benner Chief Executive Campaign For Real Ale	
	Ms Mhora Samuel Director The Theatres Trust	
	Mr Paul Stock Strategic Land Manager North Country Homes Group Ltd	
	Mr Sebastian Hanley Dialogue Communicating Planning	
	Katie Adderley Planning Advisor British Wind Energy Association	
	Beverley Green Littman Robeson	
	Nathan Smith/Dan Mitchell Barton Willmore Planning Partnership	
	C P Holland Development Director George Wimpey Northern Yorkshire Ltd	
	Robert Taylor Plot of Gold Ltd	
	Dianne Bowyer DPDS Consulting Group	

	Name and Address	
	Mick Young Little Germany Developments Ltd	
	David Short The Emerson Group	
	Penny Trepka	
	Chris Creighton Peacock and Smith	
	Depol Associates	
	Rev. John Nowell	
	Rev Sarah Groves	
	The Parish Priest St Aidan's Presbytery	
	Baildon Community Link	
	Ancient Monuments Society	
	Council for British Archaeology	
	Society for the Protection of Ancient Buildings	
	The Georgian Group	
	The Victorian Society	
	The Twentieth Century Society	
	The Garden History Society	
	Andrew Bower Renewables Developer Npower Renewables	
	Hannah Philip/Claire McIntosh	

	Name and Address	
	Vincent and Gorbing Ltd	
	Stewart Ross DevPlan UK	
	Kate Anderson/Nichola Sewell Indigo Planning Ltd	
	Chris Smith Indigo Planning	
	Beverley Butler Leith Planning Ltd	
	The Abbeyfield Society	
	Colin Burnett Burnett Planning & Development	
	Rachel Pierce Sanderson & Weatherall	
	Jamie Pyper Land & Development Practice	
	Chris Thomas Chris Thomas Ltd Outdoor Advertising Consultants	
	Jason Tait Planning Prospects Ltd	
	Trevor Sayle Goldfinch Estates Ltd	
	Mr S MacPherson Ben Rhydding Action Group/Save Us Pub	
	Val Summerscales	

	Name and Address	
	Bradford District Chamber of Trade	
	John Goodwin/Kate Broadbank Carter Jonas	
	Faye Wilders RPS	
	Conar Vallely How Planning	
	Mrs B Smith	
	Jemma Benson Future Energy Yorkshire	
	Mr T Bendrien	
	Charles Patchett Patchett Homes Ltd	
	Mr J P Lloyd	
	Martin Spiers	
	Felicity Wye Planning Research Manager Tribal MJP	
	Duncan Hartley Hartley Planning Consultants	
	Tom Jones	
	Christopher Whitmore Andrew Martin Associates	
	F M Lister & Son	
	Dr A Tupholme Yorkshire Gardens Trust	

	Name and Address	
	Tamsin Cowley Dunlop Haywards Planning	
	Steve Hughes Hurstwood Group	
	Mr Kurt Kunz Gazeby Hall Farm	
	James Woffendin David Wilson Homes Northern	
	Edward Uwechue DPP	
	Emma Knott Purearth PLC	
	Mr C Narrainen	
	John Wilkinson Trench Wood Barn	
	National Offender Management Service c/o Lambert Smith Hampton Atkins Global	
	Joanne Besford and Tony Zacharczuk	
	Mr & Mrs Filligan	
	Vicki Richardson Walton & Co	
	Jay Everett Director CB Richard Ellis Ltd	
	Kate Matthews Assistant Planner Firstplan	

	Name and Address	
	Andrew E Brown Land and Planning Manager Brookhouse Group	
	Laura Haworth	
	Rachael Probert Taylor Young	
	Gemma Brickwood Planning Potential	
	Annette Elliott Retail Planning Liaison Manager Property Division – Planning The Co-operative Group Ltd	
	Mr G E Tattersall	
	Jonathan O'Connor	
	Wendy Sockett Planning & Development	
	Matthew Sheppard Turley Associates	
	Vicki Ingleby Turley Associates	
	Alistair Flatman Scott Wilson	
	Claire Norris Planning department Lambert Smith Hampton	
	Louise Moody Turley Associates	

	Name and Address	
	Michael Brooke Brooke Properties	
	The St John's Centre	
	Tim Sharpe Development Director Magellan Properties Ltd	
	Jason Taylor	
	Ian Moore Honorary Secretary Inland Waterways Association West Riding Branch	
	Bruce Barnes	
	Chris Darley	
	Abby Mann BIC	
	Heidi Sobers	
	John & Judith Bolland	
	Sally Fletcher Januarys	
	Frances Horne	
	Stephen Grimster GVA Grimley	
	Simon Turner Fox Land & Property	
	Greg Dickson Turley Associates	
	Jennifer Winyard Turley Associates	

	Name and Address	
	Alastair Sim	
	Aneesha Jain Turley Associates	
	Ben R Coles Strategic Land & Planning Manager Taylor Wimpey UK Limited	
	Dr Henrie Lidiard Saltaire Village Society	
	Anthony Greaves Hallam Land Management Limited	
	James Sheppard Consultant Development and Asset Strategy Jones Lang LaSalle	
	Anthony Barnet Robinson Architects	
	Ali-Marie Ladwa	
	Luke Plimmer Martineau	
	Mark Fisher Facility Development Manager The Lawn Tennis Association	
	Land & Development Manager Land & Development (B1)	
	Andy Rollinson Rollinson Planning Consultancy	

	Name and Address	
	Andrew Roberts Strategic Land manager George Wimpey West Yorkshire Ltd Taylor Wimpey	
	Nadine Illingworth Faxfleet Residents Association	
	Mrs Samantha Maddocks 3rd Queensbury Guides	
	David J Rhodes Oakenshaw Residents' Association	
	Brian Pearson Woodlands Cricket Club - Oakenshaw	
	Mrs Patricia Hollings New Horizons	
	Mrs Virginia Robinson Dracup Lodge Day Nursery	
	Mr Richard Humpreys Buttershaw Business and Enterprise College	
	Cannon Gordon Dey Holmewood Community Council	
	Pastor Warren Evans Bierley Community Association & Bethel Community Church	
	Mr Rob Martin Saltaire Village Society	
	Revd Cannon Tony Parry New Testament Church of	

	Name and Address	
	God	
	Mrs Betty Waterhouse Sutton Community Association	
	Mrs Carol Woodley Bolton Woods Community Centre	
	Mr Stan Burston Wyke Christian Fellowship	
	Mr William Barraclough Wyke Armature Rugby League Club	
	Mr David Reynolds South Bradford Community Network	
	Mr Geoff Twentyman Low Moor Local History Group	
	Mrs Caroline Heward The Salvation Army	
	Jean Sopyla Bradford South & West Live at Home Scheme	
	Jeannette Cummings-Smith Sunningdale & Manor Park NHW	
	Andrew Thorby	
	Rev. David Kennedy C of E St Johns	
	David Barry Clark Lidget Green Community Partnership	

	Name and Address	
	Mr Frank Kirk	
	Mr Brian Rhodes	
	Mr Jim Smith Incommunities	
	Mrs Rose Carol McKenny St John's Luncheon Club	
	Mrs Berna White	
	Mrs June Stenson Aldersgate Parent / Toddler Group	
	Mrs Jeanette Alderman	
	Mrs Sharon Rushworth Highfield Healthy Lifestyle	
	Mr Richard Hackford Shipley Constituency Area Panel Advisory Group (SCAPAG)	
	Mr Arnold Butterfield Sedbergh Youth & Community Centre	
	Mr David Wilford Holme Christian Community	
	Ms Liz Wooles Royds Advice Service	
	Miss Hayley Marshall Southmere Primary School	
	Mrs Carole Southwell H.B.P Residents Association	

	Name and Address	
	Mrs Shelia Philpott Forster Community College	
	Revd Mark Woodhouse Holme Church / Holme Christian Community	
	Mark Williams Miller Homes Limited – Yorkshire	
	Mrs Mandy Miller Secretary Mosssdale Residents Community Group	
	Miss Karen Hodgson Scholemoor Beacon	
	Mr Andrew Robertson Barnardo's Allergrange Community Service	
	Yvonne Oliver Partnership Development Manager	
	Mr Ken Knight Micklethwaite Village Society	
	Mr Allan Mirfield Eldwick Memorial Hall Trust	
	Trish Lambert	
	Alan Black	
	Simon Artiss Planning Manager Bellway Homes North West Division	

	Name and Address	
	Mr Anthony Casson lyss Localities West	
	Martin Walsh Martin Walsh Associates	
	Steve Gibbs Principal Consultant The Arley Consulting Company Ltd	
	Mrs Imogen Scotney Scott Wilson	

3.0 APPENDIX 3 – REPRESENTATIONS

3.1 This section contains the all the representations received on the Waste Management DPD: Issues Options as of 29th January 2010.

3.2 The 17 respondents are listed below:

1. Yorkshire Wildlife Trust
2. Martin Walsh Associates
3. Lancashire County Council
4. Earth Tech & Skenska
5. Highways Agency
6. West Yorkshire Archaeology Advisory Service
7. P Casey
8. English Heritage
9. Theatres Trust
10. Steeton-with-Eastburn Parish Council
11. Aire Valley Environmental
12. Government Office for Yorkshire and the Humber
13. Yorkshire Forward
14. Burley Parish Council
15. Environment Agency
16. Coal Authority
17. Minerals Planning Group
18. Bradford Wildlife Group
19. Waste Disposal Authority (WDA)
20. Waste Management and Environment Improvement Committee

1. YORKSHIRE WILDLIFE TRUST



1 St George's Place, York YO24 1GN Tel: 01904 659570 Fax: 01904 613467 Email: info@ywt.org.uk www.ywt.org.uk

21st December 2009.

Thank you for consulting the Yorkshire Wildlife Trust on the Bradford Waste Management DPD, a response follows.

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.

All of the above. Cooperation with adjacent authorities will have many advantages and lead to more efficient waste planning.

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?

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?

Just sites for MSW & C&I

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?

If the message of 'reduce, re-use, recycle' is reinforced and sustainable systems are being followed then net MSW should be lower despite projected growth in population.

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?

- **Education**
- **Clear messaging**
- **Community training/workshops**
- **Directory/signposting of alternative waste disposal i.e. second hand furniture stores, local recycling centres (Orinoco, Oxford for e.g.), homeless shelters, composting schemes.**
- **Charity run businesses adjacent to waste disposal sites where material which could be taken out of the waste stream is sold. There are a number of successful operations and apparently there is one at Kings Lynn.**

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?

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?

Agricultural waste is frequently valuable for the production of methane

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?

Options 4&5 offer the most sensible and sustainable solutions. Minimising waste should always be the main priority but where this has not been possible facilities should be located close to their source to reduce their carbon footprint.

Question 10

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

N/A

Question 11

What other options should be considered?

Increase recycling capacity or look to neighbouring LAs to accommodate increased recycling.

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?

A combination of Options 1 and 2. Smaller local sites are more sustainable and will be easier to decommission should less sites be needed in the future. Larger sites may be more appropriate for some types of infrastructure.

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?

Some mineral extraction sites may have very high potential for restoration to increase biodiversity and connectivity of habitat. To use such sites for landfill would be contrary to PPS9.

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?

There does not appear to be a criteria in the list of factors considered in para 5.10 to take account of biodiversity or the potential to enhance sites and increase habitat connectivity. A further option would be to exclude sites which if used would have a negative effect on biodiversity. Some brownfield sites in urban areas may be very biodiverse and valuable for wildlife and some sites in the green belt may not be so valuable.

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?

See above, answer to question 15.

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?

Option 1.

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

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?

This is the practice that is promoted to farmers under the GAEC requirements of the CAP.

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

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?

Option 1. This would send out a robust message to the public and encourage a concerted effort to reduce waste.

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?

As a nation we should be looking to other EU states who are managing their waste more effectively.

Sara Robin
Conservation Officer (Planning)
Yorkshire Wildlife Trust
1 St George's Place
York
YO24 1GN
Telephone: 01904 615581
Email: sara.robin@ywt.org.uk
Website: <http://www.ywt.org.uk>

Yorkshire Wildlife Trust is a company limited by guarantee. Registered in England Number 409650.
Registered Charity Number 210807. VAT Number 170391475. Registered Office: 1 St George's
Place, York, YO24 1GN.

2. Martin Walsh Associates

Bradford MDC

Waste Management Development Plan Document Issues & Options Paper

Reference Name:

Site Ref -

Address: ASSOCIATED WASTE MANAGEMENT LIMITED
 VICTORIA WORKS
 BARNARD ROAD, BRADFORD, BD4 7DY

Site Location

Urban Suburban Village Rural/Island Site

The site is best described as a:

- | | |
|--|---|
| <input type="checkbox"/> Agricultural Land or Workings | <input type="checkbox"/> Exhausted Minerals Working |
| <input type="checkbox"/> Public Depot | <input type="checkbox"/> Civic Amenity |
| <input type="checkbox"/> Exhausted Minerals Working | <input type="checkbox"/> Warehouse/Distribution Park |
| <input type="checkbox"/> Site for Specific Occupiers | <input type="checkbox"/> General Industry/Business Area |
| <input type="checkbox"/> White Land | <input checked="" type="checkbox"/> Other
WASTE TRANSFER STATION |

Ownership:

Public Private

Single 2-3 Multiple Approximate number of owners _____

Adjacent Uses:

Housing Employment Open Space Mixed Use Other _____

Do the Current Occupiers or adjacent uses cause any of the following?

Noise pollution Air pollution Odour HGV traffic Land Contamination

Significant car traffic Dust Vibration Attract Vermin or Birds

Comment:

Surrounding Environment

Very Good Good Average Poor Very Poor

Comment:

SITE IS SURROUNDED BY INDUSTRIAL USE

Would a Waste facility be likely to cause a visual intrusion on the landscape?

Yes Only if it had a chimney flue No

Proximity to Residential Areas:

Adjacent <500m <1000m >1000m Approximate Distance (m) 2000

Nearest Population Densities:

Low Medium High Comment: _____

Physical Constraints:

Slope Groundwater Water Courses Utilities Tree Coverage

Uneven Surfaces or Erosion Backland Other _____

Comment:

THE SITE IS IDEAL FOR A WASTE TRANSFER STATION

Road access is

Adequate for HGV & Car Traffic Adequate for Cars traffic Only Inadequate

Access Investment Required Poor site visibility

Approximate Distance to Road (metres)

Availability, Is the site available for a waste facility?

Yes Partially Available soon Unlikely Comment _____

General comments on site

Always describes site, and include any comments you have (F1)

Photographs (G2-6) (minimum of 1 image per cluster)

Image number(s) / / / /

Reference Name:

Site Ref -

Address: AWM AT CANAL ROAD, SHIPLEY, BD2 1AU

Site Location

 Urban
 Suburban
 Village
 Rural/Island Site

The site is best described as a:

- | | |
|--|---|
| <input type="checkbox"/> Agricultural Land or Workings | <input type="checkbox"/> Exhausted Minerals Working |
| <input type="checkbox"/> Public Depot | <input type="checkbox"/> Civic Amenity |
| <input type="checkbox"/> Exhausted Minerals Working | <input type="checkbox"/> Warehouse/Distribution Park |
| <input type="checkbox"/> Site for Specific Occupiers | <input type="checkbox"/> General Industry/Business Area |
| <input type="checkbox"/> White Land | <input checked="" type="checkbox"/> Other
WASTE TRANSFER STATION |

Ownership:

Public Private Single 2-3 Multiple Approximate number of owners 1

Adjacent Uses:

Housing Employment Open Space Mixed Use Other SCRAPYARD & INDUSTRIAL

Do the Current Occupiers or adjacent uses cause any of the following?

 Noise pollution
 Air pollution
 Odour
 HGV traffic
 Land Contamination

 Significant car traffic
 Dust
 Vibration
 Attract Vermin or Birds

Comment:

MEASURES HAVE NOW BEEN IMPLEMENTED TO
SIGNIFICANTLY REDUCE/ELIMINATE THE LIST ABOVE

Surrounding Environment

Very Good Good Average Poor Very Poor

Comment:

THE SURROUNDING ENVIRONMENT IS:
TO NW - SCRAPYARD. TO NE - CAR PARK & INDUSTRIAL MILL
TO SE - INDUSTRIAL UNIT & OFFICES. TO SW - TRAIN TRACKS

Would a Waste facility be likely to cause a visual intrusion on the landscape?

Yes Only if it had a chimney flue No

Proximity to Residential Areas:

Adjacent <500m <1000m >1000m Approximate Distance (m) _____

Nearest Population Densities:

Low Medium High Comment: _____

Physical Constraints:

Slope Groundwater Water Courses Utilities Tree Coverage

Uneven Surfaces or Erosion Backland Other FLAT & IDEAL

Comment:

Road access is

Adequate for HGV & Car Traffic Adequate for Cars traffic Only Inadequate
 Access Investment Required Poor site visibility

Approximate Distance to Road (metres)
ON ROAD _____

Availability, Is the site available for a waste facility?

Yes Partially Available soon Unlikely Comment _____

General comments on site

Always describes site, and include any comments you have (F1)

Photographs (G2-6) (minimum of 1 image per cluster)

Image number(s) / / / /

Reference Name: HARDCORE RECYCLING **Site Ref -** BN/F.1.4
HAMMERTON STREET, BRADFORD

Address: HAMMERTON STREET, BRADFORD

Site Location

- Urban Suburban Village Rural/Island Site

The site is best described as a:

- | | |
|--|--|
| <input type="checkbox"/> Agricultural Land or Workings | <input type="checkbox"/> Exhausted Minerals Working |
| <input type="checkbox"/> Public Depot | <input type="checkbox"/> Civic Amenity |
| <input type="checkbox"/> Exhausted Minerals Working | <input type="checkbox"/> Warehouse/Distribution Park |
| <input type="checkbox"/> Site for Specific Occupiers | <input type="checkbox"/> General Industry/Business Area |
| <input type="checkbox"/> White Land | <input checked="" type="checkbox"/> Other
<u>HARDCORE RECYCLING</u> |

Ownership:

Public Private

Single 2-3 Multiple Approximate number of owners _____

Adjacent Uses:

Housing Employment Open Space Mixed Use Other _____

Do the Current Occupiers or adjacent uses cause any of the following?

- Noise pollution Air pollution Odour HGV traffic Land Contamination
- Significant car traffic Dust Vibration Attract Vermin or Birds

Comment:

N - INDUSTRIAL	W - LIGHT INDUSTRY
E - OFFICES	S - MIXED USE

Surrounding Environment

Very Good Good Average Poor Very Poor

Comment:

SITE IS CENTRAL TO AN INDUSTRIAL AREA

Would a Waste facility be likely to cause a visual intrusion on the landscape?

Yes Only if it had a chimney flue No

Proximity to Residential Areas:

Adjacent <500m <1000m >1000m Approximate Distance (m) _____ MILES AWAY

Nearest Population Densities:

Low Medium High Comment: _____

Physical Constraints:

Slope Groundwater Water Courses Utilities Tree Coverage

Uneven Surfaces or Erosion Backland Other _____

Comment:

REASONABLY FLAT SITE

Road access is

Adequate for HGV & Car Traffic Adequate for Cars traffic Only Inadequate

Access Investment Required Poor site visibility

Approximate Distance to Road (metres)

Availability, Is the site available for a waste facility?

Yes Partially Available soon Unlikely Comment _____

General comments on site

Always describes site, and include any comments you have (F1)

Photographs (G2-6) (minimum of 1 image per cluster)

Image number(s) / / / /

Reference Name:

Site Ref -

Address: SCRAPYARD LOCATED AT CORNER OF SHIPLEY FIELDS ROAD
AND CANAL ROAD, SHIPLEY, BD2 1AU

Site Location

Urban Suburban Village Rural/Island Site

The site is best described as a:

Agricultural Land or Workings
 Public Depot
 Exhausted Minerals Working
 Site for Specific Occupiers
 White Land
 Exhausted Minerals Working
 Civic Amenity
 Warehouse/Distribution Park
 General Industry/Business Area
 Other
 SCRAPYARD

Ownership:

Public Private

Single 2-3 Multiple Approximate number of owners _____

Adjacent Uses:

Housing Employment Open Space Mixed Use Other WASTE TRANSFER STATION
& HOUSING

Do the Current Occupiers or adjacent uses cause any of the following?

Noise pollution Air pollution Odour HGV traffic Land Contamination

Significant car traffic Dust Vibration Attract Vermin or Birds

Comment:

MEASURES HAVE NOW BEEN IMPLEMENTED TO
SIGNIFICANTLY REDUCE/ELIMINATE THE LIST ABOVE

Surrounding Environment

Very Good Good Average Poor Very Poor

Comment:

THE SURROUNDING ENVIRONMENT IS:
TO NW - HIGH RISE FLATS. TO NE - LARGE INDUSTRIAL MILL
TO SE - AMM WASTE TRANSFER STATION. TO SW - TRAIN TRACKS

Would a Waste facility be likely to cause a visual intrusion on the landscape?

Yes Only if it had a chimney flue No

Proximity to Residential Areas:

Adjacent <500m <1000m >1000m Approximate Distance (m) _____

Nearest Population Densities:

Low Medium High Comment: _____

Physical Constraints:

Slope Groundwater Water Courses Utilities Tree Coverage

Uneven Surfaces or Erosion Backland Other FLAT & IDEAL

Comment:

Road access is

Adequate for HGV & Car Traffic Adequate for Cars traffic Only Inadequate

Access Investment Required Poor site visibility

Approximate Distance to Road (metres)

ON ROAD

Availability, Is the site available for a waste facility?

Yes Partially Available soon Unlikely Comment _____

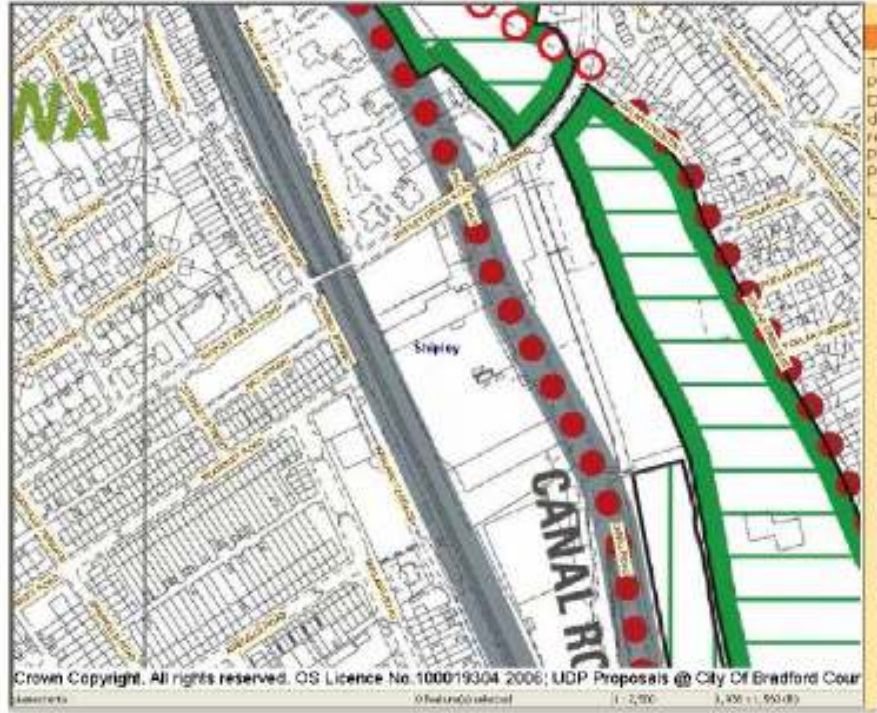
General comments on site

Always describes site, and include any comments you have (F1)

Photographs (G2-6) (minimum of 1 image per cluster)

Image number(s) / / / /

Waste Management Document, Supplementary Information: DW



AWM, Canal Road Site

Waste Management Document, Supplementary Information: DW



Waste Management Document, Supplementary Information: DW

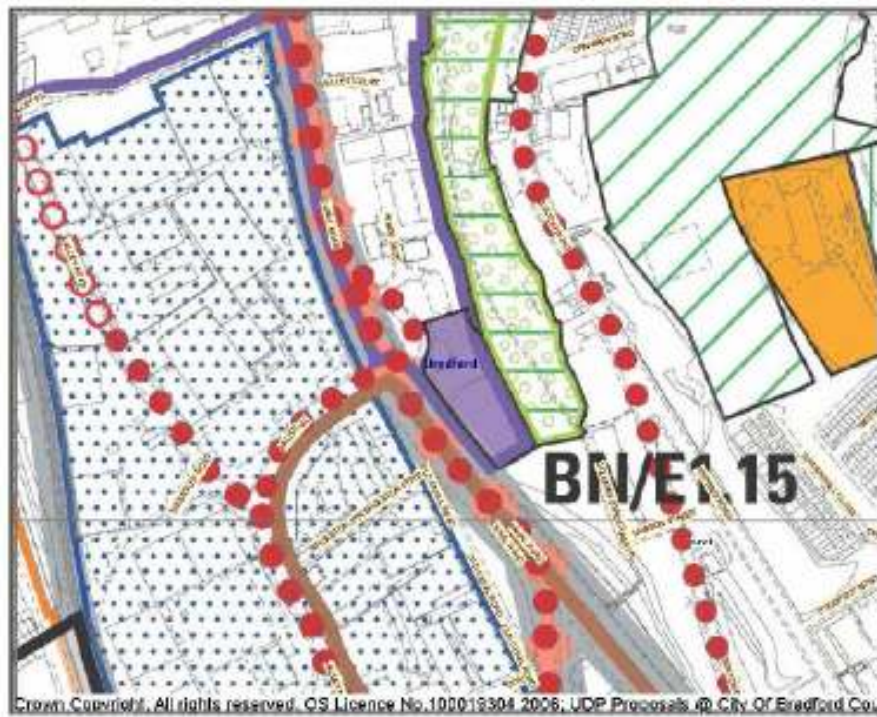


Canal Road, West of Gas Holders

Waste Management Document, Supplementary Information: DW



Waste Management Document, Supplementary Information: DW



BN/E1.15 Canal Road, 'Bolton'

Waste Management Document, Supplementary Information: DW



Waste Management Document, Supplementary Information: DW



Hammerton Street

3. LANCASHIRE COUNTY COUNCIL

Ben Marchant

From: Nurser, Louise [Louise.Nurser@lancashire.gov.uk]
Sent: 30 December 2009 13:00
To: LDF Consultation
Subject: Issues and Options consultation

I have no comment to make relating to this document.

Best wishes

Louise

Louise Nurser
 Principal Planning Officer | Waste & Minerals Policy
 Environment Directorate
 Guild House | Cross Street
 Preston | PR1 8RD
 Tel. (01772) 534136

For more information on Waste and Minerals Policy in Lancashire please visit our website
www.lancsmwdf.com

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Lancashire, a place where everyone matters

4. EARTH TECH AND SKENSKA

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Bradford Local Development Framework Group
 FREEPOST NEA11445
 PO BOX 1068
 Bradford
 BD1 1BR

Our Ref: D110175/0037

Your Ref:

Date: 16th December 2009

By E-mail and Post

Dear Sir/Madam,

CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL WASTE MANAGEMENT DPD ISSUES AND OPTIONS CONSULTATION

We write on behalf of Earth Tech and Skanska (ETS) to submit the attached schedule of representations in respect of the above.

If you have any queries or require any further information at all, please don't hesitate to contact me.

Yours sincerely
 for SCOTT WILSON LTD

Imogen Scotney
 Minerals and Waste Consultant

Direct Line: +44 (0)1246 244 578
 email: imogen.scotney@scottwilson.com

Enc: Schedule 1: Representations

Cc: Mark Tribe, Skanska

Schedule 1

CBMDC Waste Management DPD: Issues and Options
Representations by Earth Tech Skanska (ETS)



1 Introduction

1.1 General

This document sets out the response of Earth Tech Skanska (ETS) in relation to the City of Bradford Metropolitan District Council (CBMDC) Waste Management DPD: Issues and Options consultation document, published on 9th November 2009.

ETS is a collaborative venture formed between Earth Tech Engineering Ltd (Earth Tech) and Skanska Infrastructure Development UK Ltd (Skanska).

1.2 About Earth Tech and Skanska

Earth Tech (now AECOM Design and Build) is one of the leading providers of geotechnical, environmental and waste management services in the UK, with capabilities including engineering, remediation, construction, contract operations and management, air quality management, water and wastewater engineering, solid waste management and transport and infrastructure engineering.

Skanska is one of the world's leading construction groups with expertise in construction, development of commercial and residential projects and public-private partnerships. The company has capability in every aspect of the construction, development and infrastructure process - from design right through to facilities management, with specialist skills ranging from piling and foundations, through mechanical and electrical engineering and steel decking to civil engineering and utilities work.

ETS is currently working in collaboration in respect of a number of long term local authority waste treatment contracts, including the Bradford and Calderdale Waste Partnership PFI project.

Schedule 1

CBMDC Waste Management DPD: Issues and Options
Representations by Earth Tech Skanska (ETS)



2 Consultation Response

This following sets out ETS's response to the key questions and options posed in relation to the CBMDC Waste Management DPD: Issues and Options consultation document. The question numbering used below is taken from the consultation paper.

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 DPDs and their reviews;*
- *commenting on waste related planning applications; and*
- *the commissioning of joint reviews, data updates and specific waste related studies.*

It is considered that CBMDC should work together with neighbouring local authorities within West Yorkshire to find joint solutions for waste management where such solutions offer benefits in terms of proximity¹, affordability and sustainability, etc. Except in the case of specialist facilities which are designed to manage single waste streams or hazardous wastes for example, it should be recognised that proximity and sustainability criteria are unlikely to be met if such joint facilities manage waste arising from or transported to locations outside of the West Yorkshire sub-region.

Connected with this, CBMDC should consider, in preparing the Waste Management DPD, that it will be relevant not simply to plan to manage all of the waste arising within the administrative area of Bradford but that some of Bradford's waste is likely to be exported while waste from other neighbouring local authorities may be imported.

Information sharing, data updates and collaborative working on emerging DPDs and their reviews is therefore particularly important, so that CBMDC can fully appreciate, *inter alia*:

- *changing circumstances in neighbouring local authorities; and*
- *any need to change the level of waste management facility provision in Bradford as a result of changes in the type and amount of waste imported to and exported from Bradford,*

and thus CBMDC is able to plan accordingly.

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?

¹ Whilst the term 'proximity principle' in PPG10 has now been replaced by 'one of the nearest appropriate installations' in PPS10, the term proximity is still used within this response as a convenient shorthand.

Schedule 1

CBMDC Waste Management DPD: Issues and Options
Representations by Earth Tech Skanska (ETS)



If the objectives are read holistically, they are broadly supported. However, if the third point is read in isolation, CBMDC is invited to note that it is appropriate (and in accordance with national planning guidance as stated in PPS10) to plan for an appropriate contribution to the waste needs of the sub-region and not just the Bradford community.

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?

It is considered that CBMDC should prioritise, above other categories of waste, the allocation of suitable sites to deal with MSW and Commercial and Industrial (C&I) 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?

It is appropriate that the starting point for the Waste Management DPD is to plan for the projected waste arisings for Bradford that are contained within the published RSS (the Yorkshire and Humber Plan, 2008) - in the absence of CBMDC having its own, potentially more accurate, figures.

The figures that are presented in the Issues and Options consultation document are taken from a previous draft of the RSS (the Secretary of State's Proposed Changes, 2007) and not from the final, published Plan (the reason for this is unclear). The figures contained within the published Plan are as follows (MSW and C&I waste arisings, tonnes per annum for Bradford):

<u>MSW</u>	<u>C&I</u>
2010 - 279,000	2010 - 628,000
2015 - 296,000	2015 - 638,000
2021 - 318,000	2021 - 649,000

These figures vary slightly from those contained within the draft Plan (the MSW figures are slightly higher in the published version). It is these figures which it is considered should be referenced within the Waste Management DPD and which CBMDC should use as a starting point to plan for waste management throughout the Plan period.

As mentioned above (in response to Question 1) it will be relevant for CBMDC not simply to plan to manage all of the waste arising within the administrative area of Bradford but to consider that some of Bradford's waste is likely to be exported while waste from other neighbouring local authorities may be imported.

Lastly, it is stated within the consultation document that it is intended the Waste Management DPD will cover a period of 15 years and it is anticipated that the DPD will be adopted in early 2011. In which case, there is a gap of five years where data on projected waste arisings is not available (i.e. the figures in the RSS only go up to 2021, whereas the Plan period is intended to reach up to 2026). How will the waste arisings for the last five years be projected? It is thought

Schedule 1

CBMDC Waste Management DPD: Issues and Options
Representations by Earth Tech Skanska (ETS)



that the DPD should contain a projection for waste arisings throughout the Plan period (i.e. 2011 to 2026) and also maintain capacity sufficient (i.e. at least 10 years of the annual requirement - see PPS 10, para.18) throughout the Plan period.

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?

CBMDC should encourage education initiatives which are aimed at improving public understanding of waste and resource management generally and which promote waste minimisation, reuse and recycling.

Although most of the means by which this objective can be achieved fall outside the influence of the planning system, visitor/education centres for example can be provided alongside large scale waste recycling, recovery and treatment facilities, allowing the public access to appreciate and support more sustainable forms of waste management.

Question 9

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

It is thought that a combination of options one, two and three is preferable.

Firstly, there is a need to safeguard existing waste management facilities that will continue to contribute significantly to waste management infrastructure in Bradford in the future. The inclusion of such facilities/sites within the Waste Management DPD should be conditional on the sites being appropriate in planning terms - i.e. in close proximity to urban areas, within 1km of the strategic highway network and not subject to significant environmental constraints (e.g. within the Green Belt or adjacent to a SSSI, etc.). CBMDC should, in the first instance, seek to utilise the potential for developing existing waste management facilities and opportunities to develop these sites (e.g. to increase operational efficiency and/or to maximise opportunities for recycling and recovery of waste) should be supported. This has a number of benefits, such as:

- established waste management use (in planning terms);
- established highway infrastructure and routing of vehicles;
- established facility for customers;
- local acceptance of the site for waste management use; and
- sustainable use of existing assets.

The document does not currently include provision for safeguarding (and, potentially, development) of suitable existing waste management sites but it is understood, from attendance at the Stakeholder Event held in Bradford on 8th December 2009, that it is intended the Waste Management DPD will do so.

Schedule 1

CBMDC Waste Management DPD: Issues and Options
Representations by Earth Tech Skanska (ETS)



It is recognised that, in addition to developing/expanding existing facilities where possible (and appropriate in planning terms), there will be a need to allocate new sites for development in order to manage the waste arising within Bradford and also (as mentioned previously) to allow scope to import and handle waste from other, neighbouring local authorities in future.

Question 10

Assuming Option 2 and/or 3 is preferred, what type of facilities should be provided?

It is thought that CBMDC should prioritise the development of large scale recycling, recovery and treatment facilities, preferably with a range of facilities co-located on one site, in close proximity to urban areas and within 1km of the strategic highway network.

All of the above will help to ensure that the Council moves towards more sustainable waste management solutions, with fewer waste miles travelled and movement of a significant proportion of Bradford's waste higher up the waste hierarchy.

Question 12

Which option for Issue 2 is the most appropriate and why?

It is considered that the most appropriate option for CBMDC, with regard to the management of MSW and C&I waste, is to concentrate the development of waste management facilities (including residual waste treatment) on a small number of sites, strategically and appropriately located.

It is likely that large scale, strategic waste treatment facility(s) should be supported by a range of other, smaller facilities (a.g. in the case of MSW this could include Bring Sites, Household Waste Recycling Facilities and Transfer Stations).

Question 15

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

All sites (excluding those within the Green Belt and those which do not meet the minimum site size of 0.5 ha) should be tested.

ETS supports CBMDC's approach, which is not to include any sites within the Green Belt unless an insufficient number of sites are identified as suitable in the area of search not within the Green Belt (this reflects national planning guidance and to adopt an alternative approach would be unsound).

Question 16

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

With regard to Figure 14 (Site Location Impact Criteria), it is considered there are flaws with the approach taken. The minimum site size values given for most of the facilities generally appear reasonable. However, the value given for in-vessel composting and anaerobic digestion is not particularly helpful (<2.5 ha) as it can be interpreted as a minimum site size of anywhere between 0 and 2.5 ha is required for these two technology types. The remainder of the assessment criteria (i.e. 'creates air/noise/water pollution', etc.) are thought to be flawed, since

Schedule 1

CBMDC Waste Management DPD: Issues and Options
Representations by Earth Tech Skanska (ETS)



arguably any/every waste management facility has the potential to give rise to impacts on the environment (depending on the specifics of the scheme and the site itself). Furthermore, no modern waste management facility, permitted by the Environment Agency, will be designed without effective pollution control/abatement technology. Lastly, surely it is preferable that all waste management facilities are developed in proximity to waste arisings (for sustainability reasons) and proximity to other facilities is, similarly, beneficial in all cases where there are process outputs/residues that need further management.

It is not considered that this approach (i.e. trying to identify the impacts of different technology types in order to identify suitable/unsuitable sites for each specific type of technology) is necessarily the best. An alternative approach would simply be to assess the long list of sites in terms of key criteria, e.g.:

- proximity to urban areas;
- proximity to the strategic highway network;
- physical constraints;
- environmental constraints, etc.

Sites which have been assessed and do not meet the criteria can then be discounted and sites which do meet the criteria can be put forward together with a note advising on the likely types of technology (broadly speaking) which would be suitable for development on a particular site (e.g. sites of >2.5 ha are likely to be suitable for a full range of technologies; sites with a particular constraint (e.g. residential properties within 250m) may be unsuitable for [say] windrow composting).

The comments made above in respect of Figure 14 also apply to Figure 15.

Question 22

Which option do you consider the most appropriate for Issue 7 and why?

It is understood, from attending the Stakeholder Event held in Bradford on 8th December 2009 that, in relation to Issue 7, the term 'residual waste' is taken to mean the very last proportion of the waste (i.e. post recycling/recovery/treatment, etc.) and an example of this is the ash from an Energy-from-Waste (EfW) facility. It does not mean, for example, the residual MSW that remains after kerbside recycling. This is not currently clear in the document.

Generally speaking, residual waste facilities should be located near to the source of the waste (co-located if at all possible). An example of this is an incinerator bottom ash processing facility located on the same site or adjacent to an EfW or a wastewater treatment facility located on the same site or adjacent to an Anaerobic Digestion (AD) facility.

5. HIGHWAYS AGENCY

Safe roads, Reliable journeys, Informed travellers



Bradford Local Development Framework Group
FREEPOST NEA 11445
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BD1 1BR

Toni Rios
Network Planning Manager (Y&NE)
3 South
Lateral
8 City Walk
Leeds LS11 9AT

Direct Line: 0113 2834710

For the attention of Andrew Marshall

5th January 2010

Dear Andrew

Bradford Waste Management DPD

We would like to thank you for providing us with the opportunity to comment upon the Bradford Waste Management DPD Issues and Options Report and the supporting documentation including the Methodology Statement and Sustainability Appraisal. Enclosed is a completed questionnaire and below are a few additional comments on the Waste Management DPD: Issues and Options Paper as well as the various other documents which were issued in November 2009.

Waste Management Issues and Options

Joint working with neighbouring local authorities

Question 1: The Highways Agency sees joint working with neighbouring authorities as very important, particularly due to not only the amount of waste currently exported from the District but also the amount of waste which is currently imported. Therefore, the District also needs to work jointly with those authorities which import waste to Bradford District.

Objectives for waste management

The aim of self-sufficiency is welcomed as large amounts of waste are currently being exported, primarily to Wakefield District, resulting in HGV trips on the Agency's Strategic Road Network (SRN). However, it does appear that the commitment to self-sufficiency is a little weaker now than it was in 2007. The February 2007 Topic Paper stated that the District "should look to be self-sufficient" in managing the waste it generates, whereas the current Issues and Options document states that the District is "to be more self-sufficient" in managing its own waste and it is "to minimise the amount of waste sent on the landfill sites within and outside Bradford District".

We consider that minimising transport needs should be a consideration in inter-authority discussions on sub-regional waste issues to comply with the spirit of PPS10.

Forecast future waste arisings

It is stated in paragraph 4.4 that the growth in total waste arisings is just 4%, however, the numbers in Figure 10 show that there is a 14% growth in waste arisings forecast. Is this a typing error in paragraph 4.4 that should read 14%?

The need for new waste management facilities in Bradford District

It is stated in paragraph 4.10 that existing incidences of recycling and composting in Bradford stand at around 21% of total MSW generated for 2007/08. This would equate to around 55,000 tonnes currently being recycled. It is stated that by 2021 a minimum of 158,000 tonnes of MSW is required to be recycled. Paragraph 4.10 states that infrastructure to meet the minimum need for an additional 158,000 tonnes of MSW is required. However, in the previous paragraph it states that 55,000 tonnes of waste is currently being recycled. Therefore, is there only the need for an additional 103,000 tonnes?

Also the last bullet point of paragraph 4.11 states that further capacity would be needed for 357,000 tonnes of C&I waste. If, of the forecast 649,000 tonnes, 214,170 tonnes goes to land fill and recovery capacity has been estimated at 78,000 tonnes, this results in capacity for 357,000 tonnes of waste required. Is there not already capacity for C&I waste in the district?

The Agency would welcome the significant improvement in re-use, recycling and composting to be delivered through the PFI and the Waste Management DPD.

Issue 2: Location of Waste Sites

The Agency would be happy to comment on the long list of sites at the appropriate time – we note that, in the Methodology Statement, that this list has been reduced to 65 sites. When would be the appropriate time to comment on these sites?

Issue 4: Locational Criteria for MSW and C&I Waste Management Facilities

The Methodology Statement states that only the shortlisted sites will be tested against the locational criteria not the long list as stated in Issue 4 Option 1. Will it be the long list of sites or the short list of sites which are tested against the locational criteria?

Waste Management DPD – Methodology Statement

Annex E of PPS10 sets out a number of locational criteria, one of which (criteria f) relates to traffic – “Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads”. The implication is that sites must minimise impact on local roads and be focused on the SRN and the primary ‘local’ road network. Therefore, the Agency would wish to see an additional criterion relating to the impact on the Agencies SRN.

Waste Management DPD - Sustainability Appraisal Scoping Report Revision

There are 2 transfer stations in the District:

- Royds Way, Keighley - handles approximately 70,000 t/pa
- Bowling Back Lane, Bradford - handles approximately 180,000 t/pa

These sites utilise large 44 tonne road going haulage and are open 362 days per year. Currently the Bradford transfer station at Bowling Back Lane hauls to Welbeck landfill near Wakefield, (contracted minimum of 160,000 t/pa); Keighley, Royds Way transfer station hauls to Skilbeden Landfill near Skipton, operated by Yorwaste (contracted minimum of 60,000 t/pa). Landfill contracts end in 2010 but it is likely that BMDC will need to procure further landfill contracts to 2015. The Keighley-Skipton movement has no impact on the SRN. The Bradford-Welbeck movement has total reliance on the SRN. Therefore, the Agency would not wish to see any switch of ‘Keighley’ waste to the Welbeck site when the landfill contracts beyond 2010 are procured.

Safe roads, Reliable journeys, Informed travellers



Please do get in touch if you have any queries relating to our comments. Please note that I am on maternity leave between 15th January and 18th October, during this time you should contact my colleague Louise Wright louise.wright@highways.gsi.gov.uk

Yours sincerely

A handwritten signature in black ink, appearing to read 'T. Rios'.

Toni Rios
NO Yorkshire and the Humber Planning
Email: toni.rios@highways.gsi.gov.uk

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Rep No	Date Entered	Officer

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Form for commenting on the Core Strategy Issues and Options Further Consultation

(9th November 2009 – 25th January 2010)

The Council is consulting on the Waste Management DPD: Issues and Options. The document that is available for public comment is the Waste Management: Issues and Options Report.

You may photocopy this form or obtain further copies free of charge from the Council. The form is also available to download on the Council's website on www.bradford.gov.uk/ldf. It is recommended that representations be made on this form as this helps us to consider your comments properly. If you find it easier to answer the questions on separate sheets please ensure you are clear about the question you are answering. Please complete the form in black ink, clear writing or typing to aid processing. If you require any assistance completing this form

Your Details:

Title...Mrs..... Surname...Rios.....

Forename...Toni.....

Address...3 South, Lateral, 8 City Walk, Leeds. LS11 9AT

.....

Organisation: Highways Agency.....

Tele No: Home..... Work: 0113 2834710..... Mobile.....

Fax: 0113 283 5367..... Email: toni.rios@highways.gsi.gov.uk.....

Waste Management DPD: Issues and Options Paper

Key Questions

Bradford Council is seeking your views on the Waste Management Issues and Options raised within the Development Plan Document. (see www.bradford.gov.uk/ldf)

Cross-Boundary Considerations

1. How should BMDC 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. ✓

Objectives

- 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.

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?

The only local circumstance which should be considered which would result in a departure from these objectives is if there is an existing waste handling facility in a neighbouring authority which is closer to the point of source than the nearest alternative particularly if that means potential HGV movements on the SRN can be removed. We have not seen a reference to the location proposed for the new waste management facility referred to in paragraphs 3.21-3.24 of the Issues and Options document.

Forecast Future Waste Arisings

<p>3. Do we need to allocate sites for all categories of waste or do we just need to allocate site for MSW and C&I waste? All Categories of Waste <input type="checkbox"/> MSW and C&I Waste Only ✓</p> <p>As hazardous waste is not forecast to increase and if policies are in place that require the maximisation of on-site recycling and re-use of construction and demolition waste, which the Highways Agency would strongly support as this minimises the amount of potential HGV trips on the SRN, sites will just need to be allocated for Municipal Solid Waste (MSW) and Commercial & Industrial (C&I) waste.</p>	<p>5. Are the levels of waste to be planned for within the DPD realistic or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?</p> <p>The forecasts of waste arisings have been 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). Analysis of the increase in households in Bradford District is set to increase by around 19% between 2007 and 2021 taking the 2007 figures from Tempo version 5.4. Figure 10 shows that Municipal Solid Waste is set to rise by 21%. Therefore, this looks like a robust forecast.</p>
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<p>4. Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste) categories of waste? Yes <input type="checkbox"/> No <input type="checkbox"/> No comment</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	<p>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.</p> <p>Are there other approaches of minimising waste arisings that the Council should promote in the DPD?</p> <p>The Highways Agency would support any planning approaches which assist in reducing waste arising. It is suggested that as C&I waste represents a large proportion (38%) of the total waste arisings in Bradford, the Council should consider encouraging small and medium sized enterprises in the application of waste minimisation processes and set an example by setting targets for in-house waste minimisation and recovery. A public information programme for environmental issues in general and waste management in particular. The Council could also set realistic disposal charges will be imposed which further waste minimisation objectives.</p> <p>.....</p>
---	--

Regional and National Policy	Agricultural and Other Waste
<p>7. Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and re-use of waste? Yes <input type="checkbox"/></p> <p>The Highways Agency would always support the national and regional policy aspiration to maximise the recycling and re-use of construction and demolition waste. It would not encourage a departure from this policy aspiration as this could result in additional HGV movements on the SRN.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>No <input checked="" type="checkbox"/></p>	<p>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? Yes <input type="checkbox"/> No comment</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>No <input type="checkbox"/></p>

ISSUES AND OPTIONS

ISSUE 1: INTERNAL WASTE MANAGEMENT	
Option 1	Option 3
Focus on consolidating and increasing capacity at existing facilities across the District, and recognise that some waste will need to be managed outside Bradford.	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.
Option 2	Option 4
Provide additional sites and capacity to manage growing waste arisings within the District.	Work with adjacent authorities to identify appropriate sites / facilities to accommodate waste arisings as closely as possible to their source.
Option 5	Question 9
Minimise waste production / arisings across the District through appropriate planning policies, therefore minimising site allocations required.	<p>Which Option or combination of options for Issue 1 are the most appropriate and why?</p> <p>The Highways Agency feels that in order to reduce the number of HGV movements on the SRN, Option 5, to minimise waste production/arisings across the District through appropriate planning policies, therefore, minimising the site allocations required is important. However, there will still be a need to increase waste disposal within the District, particularly as currently a large proportion of waste is exported to other districts. All moves towards self-sufficiency will be welcomed and therefore the Agency would prefer Option 2 - providing additional sites and capacity to manage growing waste arisings in the District over Option 1. The Highways Agency does recognise that some waste will need to be transported across LPA boundaries to sub- regional facilities. However, there is the risk that there would be some impact on the SRN and therefore the Agency would only encourage Option4 (working with adjacent authorities to identify appropriate sites) in order to identify sites in neighbouring authorities which are closer to the source if it had no impact on the SRN.</p> <p>In general, the Agency would not support Option 3 providing 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 as this could result in additional HGV trips on the SRN. The Agency would only have no objection if it would benefit a neighbouring authority without producing additional trips on the SRN.</p>
Question 10	Question 11
Assuming Option 2 and/or 3 are preferential, what type of facilities should be provided.	What other options should be considered?
No Comment	The Highways Agency believes that all of the options have been considered and that it is a combination of options which is required as discussed in our response to Question 9
ISSUE 2: LOCATION OF WASTE SITES	
Option 1	
Are there any other options that should be considered for Issue 2? Concentrate waste management facilities in a small number of strategic sites / locations.	
No Comment	
Question 12	
Which option for Issue 2 is the most appropriate and why?	
The Highways Agency would prefer Option 2 as this would reduce the need to travel and hence potential HGV trips on the SRN.	
Question 14	

ISSUE 3: IDENTIFYING SITE FOR WASTE MANAGEMENT FACILITIES	
Option 1	Option 2
Test all sites on the initial long list within the area of search, excluding those in the Green Belt other than existing facilities.	Test all sites on the initial long list, including new potential sites in the Green Belt.
Question 15	
<p>Which option is the most appropriate and Why? Are there Alternative options?</p> <p>The Highways Agency prefers Option 1, that sites in the Green Belt should not be considered. However, if a site outside the Green Belt would result in a significant number of HGV movements on the SRN, then alternative sites within the Green Belt should be considered.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	

ISSUE 4: LOCAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES	
Option 1	Question 16
Test the long list of potential waste sites (appendix 1) against the Municipal Solid Waste and Commercial & Industrial waste facility location criteria as identified.	<p>Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?</p> <p>One additional criterion should be impact on the SRN as a facility may be close to the waste arisings but still have impact on the SRN.</p> <p>.....</p> <p>.....</p>

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE	
Option 1	Option 2
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.	Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.
Option 3	
Combination of Options 1 and 2.	
Question 17	Question 18
<p>Which option do you consider the most appropriate and why?</p> <p>The Agency would encourage Option 1, the maximisation of on-site recycling and re-use of construction and demolition waste to minimise waste arisings. However, it does recognise that there may still be a need to dispose of some waste off site, therefore would welcome the criteria based approach for locating new expanded waste management facilities as long as it includes a criterion relating to impact on the SRN.</p> <p>.....</p> <p>.....</p> <p>.....</p>	<p>Is there any other option that should be considered?</p> <p>No Comment</p> <p>.....</p> <p>.....</p> <p>.....</p>

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS	
Option 1	Option 2
Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period.	Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.
Option 3	Option 4
Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.	Develop a policy approach combining either Option 1 or 2 with Option 3.
Question 19	Question 20
Which option do you consider the most appropriate for Issue 6 and why? The Agency does not have a favoured option but would like to have an opportunity to be consulted in future on locations of potential new sites for managing hazardous waste.	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? No comment
Question 21	
Should the DPD consider any other types of waste? No Comment	

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE	
Option 1	Option 2
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.	Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.
Option 3	Option 4
Provide a combination of both Options 1 and 2.	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	Question 23
Which option do you consider the most appropriate for Issue 7 and why? Option 4 is the least preferable of the options for the Agency, but recognises the need for a transition period in moving from reliance on external sites to a high level of self-sufficiency.	For Issue 7 Option 2, should additional capacity be identified in existing or new sites? The Agency would welcome the consideration of new sites if these were located closer to the point of source and therefore reduced the impact on the SRN.

Question 24	
<p>Are there other options that should be considered for Issue 7?</p> <p>No Comment</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	

Please note that representations cannot be treated as confidential and a schedule of all representations received will be published

Please detach the completed comment form and return by Monday 25th January 2010 to:

Bradford Local Development Framework Group
FREEPOST NEA11445
 PO BOX 1068
 BRADFORD,
 BD1 1BR
 email: ldf.consultation@bradford.gov.uk
 Fax 01274 433767

Hand Deliver to the any of the districts planning offices in the City Centre, Keighley, Shipley and Ilkley.

6. WEST YORKSHIRE ARCHAEOLOGY ADVISORY SERVICE

Waste Management Issues and Options - comments by the West Yorkshire Archaeolo... Page 1 of 2

Ben Marchant

From: Ian Sanderson [I.Sanderson@wyjs.org.uk]
Sent: 13 January 2010 17:34
To: LDF Consultation
Cc: Christine Kerrin
Subject: Waste Management Issues and Options - comments by the West Yorkshire Archaeology Advisory Service

Dear Sir / Madam,

Thank you for consulting the West Yorkshire Archaeology Advisory Service (WYAAS) with regard to CBMDC's Waste Management Development Plan Document: Issues and Options Consultation.

The West Yorkshire Archaeology Advisory Service is the the retained professional adviser to CBMDC on the historic environment.

We are concerned that according to the Methodology Statement prepared by CBMDC & GVA Grimley, November 2009 (para. 2.6) although World Heritage Sites, historic battlefields & historic parks & gardens have been excluded from possible allocation, there is no indication that statutorily protected archaeological sites (scheduled ancient monuments), listed buildings, conservation areas & regionally important archaeological sites (so-called Class II sites as defined in CBMDC's current UDP) have been considered when allocating possible sites. These are sites that should be excluded from consideration given the Core Strategy SA Objective includes the need to "Protect and enhance historic assets" & the Draft Waste DPD SA Objectives include the need to "Avoid, protect and enhance historic assets" (see p.48 of the Waste Management DPD Issues and Options document).

We would ask that the list of 124 potential sites identified in Appendix 2 of the Waste Management DPD is screened against impact (both direct and indirect, including the issue of setting) on any scheduled ancient monuments, listed buildings, conservation areas and Class II archaeological sites. The WYAAS would be glad to assist in this matter, as I'm sure would the CBMDC's Design & Conservation Team.

If you require any further information or clarification, please do not hesitate to get back in touch.

WYAAS would be glad to be consulted on future developments & consultations of CBMDC's LDF.

Yours faithfully,

Ian Sanderson

Principal Archaeologist, WYAAS

West Yorkshire Archaeology Advisory Service

Registry of Deeds

Newstead Road

Wakefield

WF1 2DE

7. P CASEY

THE ARLEY CONSULTING COMPANY LIMITED

Chorleian House
49-51 St Thomas's Road
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PR7 1JE



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E-mail: mailbox@taccl.co.uk
www.taccl.co.uk

Our Ref: SWG/05287/100113-bldfg

13 January 2010

Bradford Local Development Framework Group
FREEPOST NEA11445
PO Box 1068
Bradford
BD1 1BR

Dear Sirs

**CITY OF BRADFORD MDC
WASTE MANAGEMENT DPD ISSUES AND OPTIONS CONSULTATION
RESPONSE OF P CASEY (ENVIRO) LTD**

The Arley Consulting Company Ltd (TACCL) has been instructed to submit the following comments on behalf of P Casey (Enviro) Ltd (PCE)

INTRODUCTION

PCE owns land at Buck Park Quarry, Denholme, which previously had the benefit of planning permission for mineral extraction and landfill. PCE intend to apply for a new permission early in 2010 and, in that context, wish to comment in particular on Issue 7 - Management of Residual Waste. PCE also wish to nominate the site for consideration as a landfill.

Before commenting on Issue 7, PCE wish to comment on two general points in relation to the Consultation:

- The availability of the Core Strategy Preferred Option consultation.
- The applicability of the Issues and Options to Landfill and to other waste management options.

PCE are widely experienced in waste treatment, landfill and mineral extraction, with operations concentrated in West Yorkshire, Greater Manchester and Lancashire.

CORE STRATEGY PREFERRED OPTION

The consultation refers to the preferred option, for example, at Para 5.10. In the July 2009 issue of "Plan-it Bradford", it appeared to be envisaged that the two consultations would take place in parallel. Without knowing the content of this related document, we cannot know whether it would be relevant to our responses to the Waste DPD Issues and Options, for example, as discussed below in relation to Question 22.

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13 January 2010
Bradford Local Development Framework Group



APPLICABILITY TO LANDFILL AND OTHER OPTIONS

PCE consider that there is some uncertainty as to whether some of the Issues, Options and Questions are intended to apply to landfills.

Para 2.9 includes landfills within the terminology "waste management facilities".

However, Figures 14 and 15, within Issue 4 - "Locational criteria" do not include landfills.

Issue 1 seems to be concerned primarily with the balance of imports, exports and the management of wastes within the district.

Issue 7 seems concerned with similar issues in relation to landfill.

PCE's impression is therefore that Issue 7 is intended to relate to landfill, and Issues 1-6 to other options. However, para 5.45 refers to the Area of Search in the preferred option. Para 5.11 seems to envisage that that is in the public domain.

PCE is therefore unclear as to whether Issue 2 is intended to apply to landfill.

PCE suggest that in the next stages the applicability of the content, and the use of the terms "facilities" and "sites" is made clearer.

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE

Option 1

PCE support the principal of the waste hierarchy, and recognise that landfill is at the foot of the hierarchy. Nevertheless, as para 5.42 recognises, it is likely that some residual waste will remain to be landfilled.

We would have thought that the encouragement of movement up the hierarchy through alternative technologies is more properly a matter for the Core Strategy, for which the Preferred Option consultation is not yet available.

Option 1 suggests "limiting landfill capacity", which we assume would reinforce any positive support for the other technologies.

The question is, then, how to match availability with need.

The need for landfill is likely to vary both with progress in the provision of the other technologies, and the quantitative and qualitative suitability of the wastes for treatment. The latter are likely to vary according to development of the economy, technology and legislation.

Landfill can provide a robust final disposal option that is less sensitive to changes in waste quantity and composition than other options.

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13 January 2010
Bradford Local Development Framework Group



The availability of landfill is difficult to control. The overall capacity of a landfill is largely determined by site-specific factors. The rate of release of that capacity is usually determined by factors such as traffic impacts or operational capacity of site plant.

To attempt to control the rate of release (annual input) for policy reasons may risk the landfill being uneconomic to operate, as many costs are fixed.

Whilst Option 1 is superficially attractive in policy terms, PCE would wish to see much greater detail of the mechanisms for limiting capacity.

Option 2

It follows from our views on Option 1 that we consider that landfill capacity should be provided within the District.

Option 3

The combination of options is reasonable in policy terms subject to the mechanism for limiting capacity. We would be open to discussion as to how capacity could be limited so as not to prejudice the waste hierarchy.

Option 4

We consider that the proximity principle clearly favours the provision of capacity in the District, and Bradford's emerging Core Strategy Vision also clearly favours this. Our reading of the Consultation paper is that the Council continues to take this view – for example, paras 1.2, 1.4, and 2.7.

It is unlikely that all areas will be equally able to provide landfill capacity, and therefore to use up the sub-regional capacity without assurance that all authorities would then be equally able to replace it on a self-sufficient basis is unacceptable.

Question 22

For the reasons stated above, PCE prefer Option 2, but Option 3 could be acceptable subject to the mechanism of capacity limitation.

Question 23

The key factor in identifying additional capacity must be the suitability of the candidate sites.

Question 24

We can see no other options.

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13 January 2010
Bradford Local Development Framework Group



SITE NOMINATION

In response to para 1.20, PCE wish to nominate Buck Park Quarry as a site suitable to meet the need for landfill identified in para 5.42.

The site could, with further mineral extraction, provide a void capacity of about 1.5 million cubic metres.

PCE consider that the planning history of the site demonstrates its suitability, and intend to make a planning application to demonstrate that the site remains suitable.

Given that the site is suitable, and the Council's views on the proximity principle and the need to plan for some residual waste landfill, PCE consider that this is the obvious site to provide the necessary capacity.

We are also writing separately to nominate the site, including a plan showing the site boundary.

Yours faithfully



STEVE GIBBS
Principal Consultant

THE ARLEY CONSULTING COMPANY LIMITED

Chorleian House
49-51 St Thomas's Road
Chorley, Lancs
PR7 1JE



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www.taccl.co.uk

Our Ref: SWG/05287/100113-bldfg2

13 January 2010

Bradford Local Development Framework Group
FREEPOST NEA11445
PO Box 1068
Bradford
BD1 1BR

Dear Sirs

**CITY OF BRADFORD MDC
WASTE MANAGEMENT DPD ISSUES AND OPTIONS CONSULTATION
SITE NOMINATION: BUCK PARK QUARRY**

The Arley Consulting Company Ltd (TACCL) has been instructed by P Casey (Enviro) Ltd (PCE) to submit the following site nomination.

A separate response is being made to the Waste Management DPD Issues and Options Consultation.

In response to paras 1.20 and 1.21 of the consultation document, PCE wish to nominate Buck Park Quarry as a site suitable for the landfill of residual wastes, that is, residues of other waste management options, wastes for which alternatives are not available or wastes which are not suitable for available treatments. These wastes might be any of those named in the consultation paper, namely MSW, C&I waste, C&D waste or other waste, but excluding hazardous wastes.

The site could, with further mineral extraction, provide a void capacity of about 1.5 million cubic metres.

PCE consider that Buck Park Quarry is demonstrably suitable because:

- It has previously been granted planning permission.
- The permission expired for administrative reasons.
- The Public Inquiry and Judicial Review proceedings demonstrated that all the environmental issues identified could be adequately addressed.
- The site was allocated for landfill in the UDP, but the Council did not ask for that Policy to be saved.
- PCE intend to make a planning application to demonstrate that the site remains suitable.

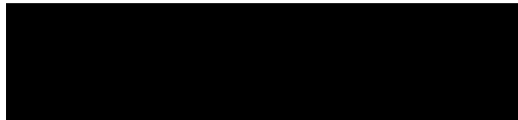
-2-
13 January 2010
Bradford Local Development Framework Group (2)



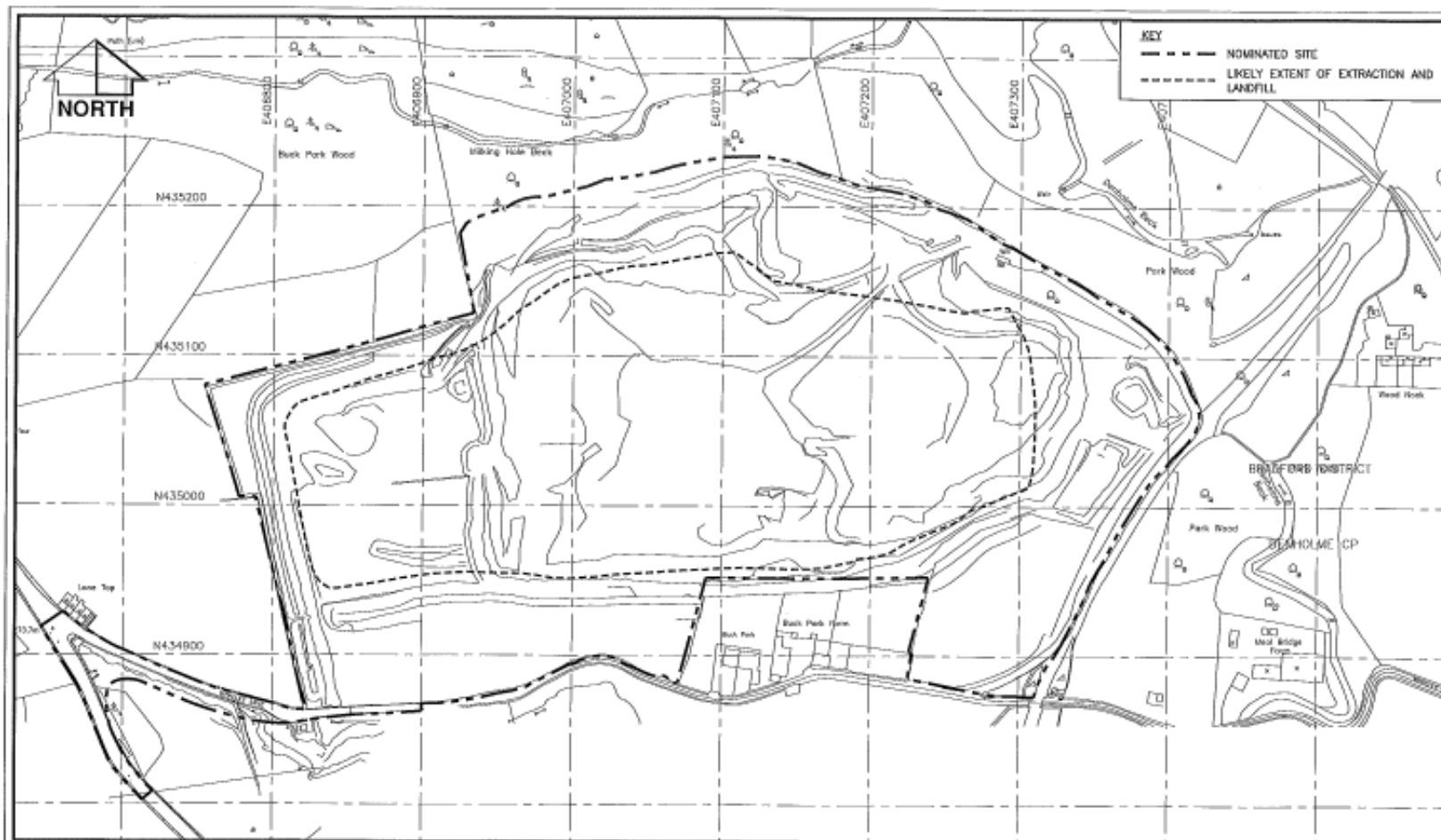
Given that the site is suitable, and the Council's views on the proximity principle and the need to plan for some residual waste landfill, PCE consider that this is the obvious site to provide the necessary capacity.

A plan is attached showing the site boundary and likely area of mineral extraction and landfilling.

Yours faithfully



STEVE GIBBS
Principal Consultant



<p>THE ARLEY CONSULTING COMPANY LIMITED</p> <p>Cheslean House 49-51 St Thomas's Road Chorley, Lancashire PR7 1JE</p>  <p>Tel: 01257 276300 Fax: 01257 268063 E-mail: trailben@arley.co.uk</p>	<p>CLIENT</p> <p>P. CASEY (BUCK PARK) LTD</p>	<p>JOB TITLE</p> <p>BUCK PARK QUARRY DENHOLME KEIGHLEY WEST YORKSHIRE</p>	<p>DRAWING TITLE</p> <p>NOMINATED SITE</p>	<p>DRAWN BY:</p> <p>L.G.</p> <p>DATE:</p> <p>12/01/2010</p> <p>SCALE:</p> <p>1:2500</p>	<p>APPROVED BY:</p> <p>S.G.</p> <p>DRAWING No.:</p> <p>05287/14</p>
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8. ENGLISH HERITAGE

Bradford Local Development Framework,
FREEPOST NEA 11445,
PO Box 1068
BRADFORD,
BD1 1BR

Our Ref: HD/P5114/04

Your Ref:

Date: 19 January 2010

Dear Sirs,

Bradford Local Development Framework: Waste Management DPD Issues and Options

Thank you for consulting English Heritage about the Waste Management DPD Issues and Options. We have the following comments to make in response to the questions posed in the document:-

Question 2

In view of the Government's objectives regarding sustainable waste management, one might have expected the Objectives to have included some reference to ensuring that new waste developments are provided for in a way that protects human health and the environment. Consequently, it is suggested that the third Objective is amended to read:-

"To ensure that expanded and new waste developments support the planned growth and waste needs of Bradford and are delivered in a manner which protects the District's environmental assets and safeguards human health".

Question 6

Given the proportion of waste that comes from construction and demolition, the LDF, as a whole, should seek, in the first instance, to encourage the reuse and refurbishment of existing buildings. Only where this is clearly shown not to be feasible or to be the most sustainable option, would buildings be allowed to be demolished and the site redeveloped. Where demolition is allowed, provision should be made to reuse the materials wherever possible.

Question 16

- In some cases, a site would be so wholly contrary to national policy guidance that it should not be taken forward – no matter what it scores against other criteria. For example, a site which resulted in the destruction of a Scheduled Monument would wholly conflict with the advice in PPG16 and, as a result, the site would be unlikely to gain consent – unless there were no other sites available.

As part of this first sift of the long list, the cases where sites are so in conflict with national policy guidance should be able to be ruled out no matter what they score.

- Given the Council's stated intention that the LDF, as a whole, should deliver sustainable development, the waste strategy should include a category which scores the potential of a site to use non-road distribution (i.e. rail, river or canal).
- It would be helpful to set out how it envisaged the likely effects upon the surrounding environment might be scored using the proposed matrix. One can envisage that sites may score well against one aspect (e.g. landscape) but poorly against another (e.g. biodiversity). In such a case, would the score for Surrounding Environment simply be averaged out? If so this could mask areas where there are particularly harmful effects. In some cases the impact upon one aspect of the environment might be so severe that the score would be 0 no matter how high it scored against other elements of the environment. It may well be necessary to a further sift of sites in order to address this issue.

Question 18

As set out in our response to Question 6, in order to reduce the amounts of construction and demolition waste, the LDF needs to start from the principle that the most sustainable strategy is to reuse/adapt the existing building stock. Clearly there will be cases where this is either impracticable or can be shown not to be the most sustainable option. In such cases, demolition of the building would be permitted. However, the Plan should seek to reuse the materials especially those, such as dressed stone and roofing slates, which are typically used within the District's settlements and can help reduce the need for extraction of building stone.

Only where such materials cannot be reused for building, should they be allowed to be crushed as aggregates or hardcore. This approach might be able to be pursued through though Conditions on Planning Approvals and the plan may need to make provision for the establishment of facilities to recycle such building materials.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

Ian Smith
Regional Planner
English Heritage, Yorkshire and the Humber Region
Telephone: 01904 601977 e-mail: ian.smith@english-heritage.org.uk

Bradford Local Development Framework,
PO Box 1068,
BRADFORD
BD1 5WZ

Our Ref: HD/P5111/03

Your Ref:

Date: 19 January 2010

Dear Sirs,

**Bradford District Local Development Framework - Waste Development Plan Document :
Sustainability Appraisal - Scoping Report Revision**

Thank you for consulting English Heritage on the above document.

Generally, in terms of the historic environment, we consider that the Report has identified the majority of plans and programmes and the key sustainability issues which are likely to be of relevance to the development of the Waste DPD. We believe that it has established an appropriate baseline together with a reasonable set of objectives against which to monitor the likely significant effects of the Plan. Therefore, we consider that it sets out the basis for an appropriate framework against which to assess the potential impact which the Policies and proposals of the Plan might have upon the historic environment of Bradford.

Our only comments on this document are as follows:-

Page	Section	Comments
9	Table NTS2 – Historic Environment	Appraisal Questions In terms of the historic environment, there is a requirement in national policy guidance to have regard to the impact of development not only upon the assets themselves, but also upon their setting. Given that the impact of most Strategic Waste Management Facilities is likely to be on the setting of the area's historic assets, the Appraisal Question should address this aspect. It is suggested the Question is amended to read:- <i>"Preserve and where relevant enhance sites of built and archaeological heritage and their settings"</i>

English Heritage strongly advises that the conservation section of the Council and the archaeological staff at WYAS are closely involved throughout the preparation of the SEA/SA of the Waste DPD. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment;

the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

Finally, we should like to stress that this opinion is based on the information provided by you with your letter dated 9th November, 2009. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the Plan) where we consider that, despite the SA/SEA, these would have an adverse effect upon the historic environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

Ian Smith
Regional Planner
English Heritage, Yorkshire and the Humber Region
Telephone: 01904 601977
e-mail: ian.smith@english-heritage.org.uk

9.0 THEATRES TRUST

Ben Marchant

From: Rose Freeman [rose.freeman@theatrestrust.org.uk]
Sent: 18 January 2010 12:35
To: LDF Consultation
Subject: Waste DPD

Our Ref.: RF/2691

Waste Management Issues and Options

Thank you for your letter of 9 November consulting The Theatres Trust on the issues and options for the Waste management Development Plan Document.

The Theatres Trust is the National Advisory Public Body for Theatres and a Statutory Consultee. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.' It was established by The Theatres Trust Act 1976 and The Theatres Trust (Scotland) Act 1978 'to promote the better protection of theatres'. This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused.

Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work we have no comment to make but look forward to being consulted on the Preferred Options stage of the Core Strategy and the City Centre AAP in due course.

Rose Freeman
 Planning Policy Officer
 The Theatres Trust
 22 Charing Cross Road
 London WC2H 0QL
 Tel: 020 7836 8591
 Fax: 020 7836 3302

planning@theatrestrust.org.uk

.....
 Learn more about theatres with our online resource ['Exploring Theatres'](#)

Check out your local theatre on The Theatres Trust [Theatres database'](#)

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10. STEETON-WITH-EASTBURN PARISH COUNCIL

Ben Marchant

From: Steeton-with-Eastburn Parish Council [steebumpc@btinternet.com]
Sent: 20 January 2010 12:11
To: LDF Consultation
Subject: Waste management consultation

The comments below were approved at the parish council meeting held 13 January 2010

"LDF for Bradford District

Waste Management Development Plan Document - consultation

The council would support all the laudable objectives of:

- reducing quantity of waste
- making the polluter pay
- reducing reliance upon export of waste

And also would encourage every attempt to find and enhance positive opportunities which might derive from this exercise:

- energy to be generated from waste (local multi fuel heat generation)
- work in collaboration with neighbouring local authorities
- creation of industrial opportunities from recycling processes (involves a recognition that waste management costs money)
- waste management sites should be managed to such a high standard that they would not be regarded as "eyesores"

The council further suggests that consideration should be given to using the district's canal network to provide the infrastructure for waste collection, transfer, recycling and transport. The district's canals inevitably follow the very lines of the principle towns, villages, etc where the bulk of the waste is generated. The canals also commonly have semi-industrial brownfield sites alongside them - and would readily accept industrial investment. It is well established that canal transport uses the least energy per tonne. kilometer of all transport systems (Canal boats uses one tenth of the energy of a lorry, and they keep off the road, and they are nominally silent). The transport of waste is the most ideal cargo for canals as time is not of the essence. The Region has five canals - Leeds Liverpool, Aire Calder, Rochdale, Huddersfield and Bradford (I) - and they all link up to the national network where the same argument can be sustained. The institution of waste industries adjacent to canals throughout this district will inject capital into sites needing regeneration, it will introduce colour and life into some of the otherwise dowdy environments, assist in the preservation of some of the district's industrial archaeology, introduce additional income to the canals for their maintenance.

This exciting, and utterly logical, opportunity clashes with a statement on p4, item 1.12 "waste management sites should be located within 1 km of the major or strategic road network"

Central to all of this is the need to ensure that a programme should be introduced which increases the financial burden to be imposed upon the polluter. The benefit of such a financial burden would not only be to reduce the amount of waste generated, but also to consolidate the financial viability of waste recycling by the local authority, by industries and the creation of recycled products."

Regards

Cheryl Brown

Mrs. C. Brown BA CILCA

Clerk

Steeton-with-Eastburn Parish Council

5 The Fold, Lothersdale, Keighley, BD20 8HD

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11. AIRE VALLEY ENVIRONMENTAL

Bradford Waste Management DPD
AVE response to Issue and Options Draft



Bradford Waste Management DPD
Aire Valley Environmental (AVE)
Response to Issues and Options Draft
January 2010

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1 INTRODUCTION

1.1 *Aire Valley Environmental*

This response to the consultation on the Bradford Waste Management DPD Issues and Options Draft is made by Aire Valley Environmental. Aire Valley Environmental (AVE) is a joint venture between Kelda Water Services Ltd and Covanta Energy Ltd. AVE welcomes the opportunity to provide feedback to this first stage of the Waste Management DPD production.

AVE is one of four current bidders via Private Finance Initiative (PFI) procurement, for the award of a contract to build and operate the residual waste management facility for the municipal waste of Bradford and Calderdale District Councils.

AVE proposes to develop a Residual Waste Management Centre (which combines a number of waste technologies) at Esholt Wastewater Treatment Works (WwTW), in the Aire Valley. It is proposed to locate the facility on the existing filter beds, which, following the recent upgrade of the WwTW to comply with the Fresh Water Fisheries Directive, are no longer required for the operation of the works.

These filter beds are situated in the southern part of the WwTW and are identified as 'Major Developed Site' in the Green Belt in the Bradford Replacement Unitary Development Plan (2006).

Further details of AVE's site are provided in section 5 of this representation.

2 PROPOSED APPROACH TO SITE SELECTION FOR WASTE RELATED USES

2.1 Introduction

AVE is pleased to see that the Waste DPD has sought to set out early the proposed method for selecting appropriate waste management sites. However, AVE has some reservations about the methodology proposed by the Waste DPD and described in more detail in the accompanying technical report, 'Waste Management DPD Issues & Options Report, Methodology Statement, GVA Grimley, November 2009.'

AVE's reservations are set out below and it considers that these are issues which CBMDC may wish to reflect on, in determining the site selection method.

2.2 Transparent Links to National and Regional Policy

The Regional Spatial Strategy (RSS) (2008) carries statutory weight as part of the adopted development plan. The Waste DPD needs to be in conformity with this plan. In addition, Planning Policy Guidance Notes (PPG) and Planning Policy Statements (PPS) are material considerations to planning applications and provide direction on topic specific requirements of producing development plan documents.

The opening chapters of the DPD acknowledge the importance of the RSS and PPG / PPS. However, it is considered that the site selection methodology would benefit from being more transparent and could show how the selected assessment criteria fulfil the objectives of national and regional waste policy.

The DPD site selection methodology appears to give more weight to site selection criteria derived from the Bradford Replacement Unitary Development Plan (RUDP) adopted in 2006. AVE would encourage CBMDC to take account of the fact that some of the RUDP policies have not been saved for ongoing use and that national and regional planning policy supersedes some RUDP policy approaches.

2.3 Joint Working with Neighbouring Authorities

AVE would encourage CBMDC to work with neighbouring authorities in progressing the Waste DPD. In particular, it is worthwhile CBMDC consulting with neighbouring authorities in relation to how they may be seeking to deal with their solid wastes now that there is a move away from landfill as an optimal solution.

In the case of neighbouring authorities who may wish to export solid waste into Bradford for processing, it is advisable that CBMDC take account of their future waste arisings in addition to its own, so that a sufficient number of sites to accommodate the required capacity can be identified in the Waste DPD.

2.4 Recognising Co-Locational Benefits

Policy ENV14 'Strategic locational criteria for waste management facilities' of the RSS give priority to considering the co-location benefits of waste uses along side other complementary uses. Specifically the policy states that:

'In all areas, identification of sites for facilities should also take account of the following priority order:

- 1: *Established and proposed industrial sites, which have potential for the location of waste management facilities and the co-location of complementary activities, such as 'resource recovery' or sustainable growth parks.'*

2. *Previously developed land, including mineral extraction and landfill sites during their period of operation for the location of waste treatment activities in sustainable locations*
3. *3. Redundant farm buildings and their curtilages.*

It is known that co-location of related businesses can facilitate new supply chain relationships and drive research and innovation. It is also a way of minimising carbon impacts and generating energy off grid. Waste technologies have close synergies with other uses e.g. chemical, synthesis, energy generation and waste water treatment works.

AVE would encourage the site selection method to be revised to recognise the benefits of co-location of waste facilities with complementary uses such as industrial, chemical, process and energy uses.

2.5 Complexity of Proposed Site Selection Scoring

The site selection methodology proposes to use three separate methods of scoring the suitability of potential waste sites. This appears to be much more complex than other site selection exercises that AVE has seen elsewhere in the UK.

AVE would encourage CBMDC to consider simplifying the scoring system and set out clearly how the scoring system will be applied to derive the short list of sites considered suitable for waste related uses.

3 LOCATING WASTE RELATED USES IN THE GREEN BELT

3.1 *Considering Sites Within the Green Belt*

The Waste DPD Issues and Options draft asks respondents to select one of two options in relation to whether sites in the Green Belt should be considered further in the site selection exercise. The two options are set out on page 34 of the DPD:

- Issue 3 Option 1: Test all sites on the initial long list within the area of search, excluding those in the Green Belt;
- Issue 3 Option 2: Test all sites on the initial long list, including new potential sites in the Green Belt.

AVE considers that option 2 is most appropriate and that all sites put forward by consultees and identified by CBMDC should be tested for suitability as potential waste sites. This would enable the advantages of Major Developed Sites in the Green Belt (and potentially even other Green Belt sites) to be considered and would be in line with legislative provisions, which require all reasonable alternatives to be considered.

3.2 *Major Developed Sites Within the Green Belt*

The Waste DPD does not include any reference to the three 'Major Developed Sites' (MDS) within the Green Belt, in the District of Bradford, all of which are water treatment or waste water treatment works. These are:

- Chellow Heights Water Treatment Works;
- Esholt Waste Water Treatment Works; and
- Marley Waste Water Treatment Works.

National planning policy (PPG 2) and indeed saved Bradford RUDP policy GB6A is supportive of the redevelopment of such sites and PPS10 is clear that Green Belt locations should not necessarily be ruled out for waste related uses.

In addition draft National Planning Policy Statement 1: Energy, states that infilling or re-development of major developed sites in the Green Belt may be suitable for energy infrastructure as it may help to secure jobs and prosperity without further prejudicing the Green Belt or offer the opportunity for environmental improvement. CLG and DECC propose that National Policy Statements are material considerations to the determination of all energy / infrastructure related development proposals.

There are synergies between waste water treatment and waste management operations and these uses can appropriately co-locate. In addition the Major Developed Sites benefit from substantive existing infrastructure which would be of benefit for co-located uses.

Since there are very few MDS sites in the Bradford Green Belt, there is an opportunity for CBMDC to be more flexible in its approach to MDC criteria to recognise the co-locational benefits of these MDS sites and waste related uses. This would enable the DPD to recognise the locational and other advantages those MDS sites present in order to further support national policy on waste and energy.

4 PROPOSED APPROACH TO WASTE TECHNOLOGY SELECTION

4.1 Introduction

Whilst AVE acknowledges that the DPD has sought to understand the location requirements of different waste technologies, AVE is concerned that it avoids being too prescriptive at this early stage in the DPD preparation process.

4.2 Reflecting Location and Technology Choices

In AVE's view, it is important to select the optimal locations for waste related uses and have a broad understanding of the land use characteristics of different waste management technologies. However, AVE would recommend against the DPD being overly prescriptive on this matter, as there is a risk that several technologies and locations may be ruled out prematurely as a result.

If the Waste DPD were too prescriptive about technology so early in the process, this might stifle innovation and reduce the flexibility of the DPD, meaning that it will require more frequent review to adapt to change. These issues are discussed in more detail below.

4.3 DPD's Assessment of the Suitability of Waste Technologies

The potentially over prescriptive nature of the draft DPD can be highlighted by referring to the table at Figure 14 'Waste Management Facilities: Site Location Impact Criteria' included within the draft Waste DPD.

This table seeks to outline the potential impacts of different waste technologies, but does not recognise that these waste technologies would not receive planning permission, comply with European or National Legislation, nor receive an Environmental Permit to operate if they were to cause the impacts listed in this table.

It is AVE's view that the DPD should be careful not to replicate the role of these other legislative processes, since they are arguably more enforceable and carry greater weight than the development plan process in ensuring that waste uses minimise their potential impact on the environment and population. Indeed, Paragraph 10 of PPS23 'Planning and Pollution Control' advises that:

'The planning system should focus on whether the development itself is an acceptable use of the land, and the impacts of those uses, rather than the control of processes or emissions themselves. Planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced. They should act to complement but not seek to duplicate it.'

AVE considers that the DPD should instead focus on selecting the optimal locations for waste related uses, steered by a broader understanding of the general land use requirements and characteristics of waste management uses.

In addition, some waste technologies complement each other and often more than one technology is proposed in a given location to maximise recycling, re-use and energy efficiencies. If the DPD is overly prescriptive on the locational characteristics of waste uses this could thwart the ability to process waste efficiently and achieve the best re-use and recycling performance towards policy targets.

4.4 Innovation and Flexibility Over the Lifetime of the DPD

The Waste DPD looks forward over the next 15 years. Innovation in waste technologies is occurring rapidly, driven by the need to reduce our carbon footprint and reliance on primary materials, and to explore options to re-use process 'by products' and find new ways to generate energy. If the Waste DPD follows an over prescriptive approach to waste technologies at this early stage, it could stifle Bradford's ability to encourage and benefit from such innovation.

Bradford Waste Management DPD
AVE response to Issue and Options Draft



As an alternative, AVE would encourage the DPD to facilitate the co-location of complementary uses and understand the benefit of allowing multiple waste technologies to be located together as part of a single process.

5 LONG LIST OF SITES FOR WASTE USES AND 'CALL FOR SITES'

5.1 Introduction

AVE submitted a response to the October 2008 'Call for Sites' linked to a response to the Core Strategy: Waste Management Further Issues and Options. This included a location plan and description of the site proposed within Esholt at that time for locating the Residual Waste Management Centre.

AVE is concerned that that response has not been accurately reflected in the 'Potential Sites Long List' provided at Appendix 2 of the Waste DPD Issues and Options document. It is not clear where and how the two very small parcels of land at Esholt (identified below) included within the Long List originated as they were not proposed by AVE.

- Reference 123: Esholt Sewage Treatment Works, Adjacent to Canal Esholt across from Ainsbury Avenue; and
- Reference 124: Esholt Sewage Treatment Works, Adjacent to Boggart House Esholt

Consequently AVE is providing further details of the specific site it would like to be considered for waste related uses as this DPD progresses.

5.2 AVE Site: Redundant Filter Beds Within Esholt WwTW

The proposed development site is located within the operational boundary of the Esholt Wastewater Treatment Works operated by Yorkshire Water Services within its role as a Sewerage Undertaker.

The site is located to the north east of Bradford and south of Guiseley and Yeadon, centred at National Grid Reference 4193, 4390. The area surrounding the WwTW comprises a mixture of forested and agricultural land, with increasing prevalence of denser urban areas at a distance of over 1km from the centre of the proposed Residual Waste Management Centre site.

The villages of Apperley Bridge and Thackley are located to the south and southwest of the WwTW respectively. Esholt WwTW is bounded by Esholt village (and Conservation Area) to the north, by Buck Woods to the west, by railway lines to the east (Wharfedale Line) and to the south (Airedale Line) and by farmland to the south. The A658, a busy commuter route between Leeds and Bradford, passes near to the south east corner of the site.

The WwTW is in operation 24 hours a day providing an essential public service function and incorporates an existing incinerator for the treatment of waste sludges arising from the Treatment Works. This has an Environmental Permit.



Photograph 1: Non-Operational Filter Beds at Esholt WwTW (development site location indicated in red).

Following the recent upgrade of the Esholt Wastewater Treatment works to achieve compliance with the Freshwater Fisheries Directive, the existing filter beds are now surplus to the operational requirements. The proposed development would be located on these redundant filter beds.

The filter beds are designated as a Major Developed Site in the Green Belt, and are previously developed land. There therefore would be no greenfield land take in the development of this proposal.

The filter media would be removed from the filter beds and the land remediated as necessary to facilitate the development. The proposed development would seek to utilise as much as possible of the existing filter bed construction to minimise demolition and removal of material.

The Residual Waste Management Centre would therefore be located on a previously developed site within the wider WwTW boundary. A gross site area of 13.3 hectares has been set aside for AVE, within which the proposed development will be accommodated. The proposed footprint to be taken up by buildings is much less, approximately 2.8 hectares and equating to approximately one fifth of the site.

5.3 Waste Technologies Proposed by AVE to be Located at Esholt WwTW

AVE proposes to construct a purpose built Residual Waste Management Centre to recycle materials and recover energy from Bradford and Calderdale's residual municipal waste. This is waste which is currently sent to landfill, predominantly to sites in Wakefield and North Yorkshire. The Residual Waste Management Centre will include a number of components and buildings which vary in height and scale. The components of the Centre include:

- A mechanical pre-treatment facility for extraction of recyclable materials;

- A biological treatment process for treatment of organic waste;
- A Combined Heat and Power (CHP) enabled energy recovery facility;
- An ash recycling facility; and
- Ancillary workshops and staff accommodation.

To supplement AVE's response set out in section 4.3, below are further details of the waste technologies proposed at Esholt, and how they would relate to one another to collectively form the Residual Waste Management Centre.

The **Mechanical Pre-Treatment (MPT) facility** is designed to recover materials for recycling from the Councils' residual waste streams. These residual waste streams are the municipal waste streams that the Council has left, following the prior separation of recyclable material by the householders collected through kerbside collection recycling, and the extraction of recyclable waste at the Household Waste Recycling Centres.

The majority of the Councils' residual waste would be delivered to the reception hall at this facility from refuse collection vehicles and bulk haulage vehicles.

The facility would comprise of a plant that extracts and sorts recyclable material from the residual waste stream. This would include electromagnetic separation of ferrous materials and eddy current separation of non-ferrous metals.

The materials recovered would be inspected for quality before baling, short term storage and transportation off site for reprocessing into new products. The remaining waste material would be transported from the MPT facility by conveyor to the CHP plant for use as fuel.

The **Biological Treatment facility** is designed to recycle Council organic waste including that arising from household kitchen waste and create a beneficial compost material. The biological treatment process includes a purpose designed composting plant, i.e. the composting process will be totally enclosed within a purpose-built building. Following the conversion of the organic waste into a compost product, the product would be screened as necessary and allowed to mature undercover and then stored until use.

The **Combined Heat and Power (CHP) enabled energy recovery facility** would receive fuel derived from the Councils' waste from the following sources:

- The output from the MPT facility arising from the Councils' waste
- Commercial and Industrial waste delivered directly to the CHP facility

The fuel will be received into the waste storage bunker of the CHP plant before being processed through a moving grate thermal treatment system. This would combust the waste, releasing the energy content into hot exhaust gases which is then recovered by a steam raising boiler. The resulting steam is passed to a steam turbine connected to a generator producing electricity. The resulting electricity would be used to power the adjacent Esholt waste water treatment works and other Kelda water and waste water treatment works in Yorkshire.

The exhaust steam from the process still has considerable energy content and this heat will be available to be used in either.

- District Heating System taking energy in the form of hot water via a network of pipes to users of heat energy in the Aire valley and Bradford, and/ or
- Sewage treatment processes at the Esholt Waste water Treatment Works.

Either option would provide a major contribution to the renewable energy agenda with environmental and commercial attractions for Bradford.

Adjacent to the CHP plant will be a **Bottom Ash Aggregate (BAA) facility**. This would treat the bottom ash from the combustion grates of the CHP process. Any ferrous and non-ferrous metals would be extracted by electromagnetic and eddy current separation respectively. The Ash would then be processed into the different grades of BAA. BAA is a proven product suitable for use within the civil and construction industry as a replacement for primary aggregate, ie. sand, gravel and crushed rock extracted through quarrying. BAA would be stored on site and then used in construction projects as they arise in Bradford and the surrounding region.

The facilities at the Centre would be supported by additional functions housed in **workshops and staff office accommodation**. In addition the Centre will include a **Visitor Centre** that would be made available for local schools and other interested groups to support education on waste, energy and the environment. This can be linked to the existing Education Centre at Esholt WwTW to demonstrate the synergies between waste water treatment and municipal waste treatment. The Centre would also include operational equipment such as weighbridges and water storage and would make provision for circulation of vehicles within the site on hard-surfaced roads.

5.4 The Suitability of Esholt for Waste Related Uses

As one of Yorkshire Water's largest operational waste water treatment works, Esholt is an existing waste management location. There are many process synergies that can be achieved through the location of additional waste related uses at this site and additional benefits to Bradford in terms of innovation and employment, which are unique to the Esholt site.

PPS10 supports the consideration of Green Belt sites for waste related uses and draft National Policy Statements are supportive of energy generating uses within Major Developed Sites in the Green Belt. In addition, the Esholt site is well screened from view and the site that AVE is proposing for consideration as an allocation in the Waste DPD, is previously developed land.

Set out below are some of the potential synergies which are unique to the co-location of waste management uses with Esholt Wastewater Treatment works:

- **Process Synergies:** Low grade heat, which is a by-product from the CHP component of the proposed Residual Waste Management Centre can be used to significantly enhance the sewage sludge management process at the site, and in doing so can yield an additional energy source in the form of biogas. Currently, sewage sludge is either incinerated (primary sludge) or treated by anaerobic digestion (secondary sludge). Working with Yorkshire Water, AVE is investigating the potential to hydrolyse all of the sewage sludge using surplus heat from the EFW, then treating the sludge by anaerobic digestion. Using heat from the EFW to heat the digesters, meaning that the biogas could be collected for use as fuel rather than being used on site to heat the digesters.
- **Energy and Carbon Savings:** Yorkshire Water is one of the largest electricity users in the region. Electricity could be generated directly from the proposed Residual Waste Management Centre, which would significantly reduce the amount of electricity the Esholt WwTW will need to extract from the national grid and allows the electricity generation on site to be used as efficiently as possible, eliminating the transmission losses that occur when transmitting electricity over long distance via the national grid.



- **Innovation and Economic development:** There are many synergies between the processes used to treat waste water and general household and commercial waste. Esholt WwTW has to date pioneered anaerobic digestion, phyto-conditioning and the use of wood coppice in the waste water treatment process and Yorkshire Water continues to explore the opportunities from algae, biofuels, and hydrogen in its operations. Locating a Residual Waste Management Centre at Esholt in conjunction with the WwTW would further enhance opportunities for innovation and allow successful opportunities to be piloted in more commercial waste arenas. There is an existing office development at Esholt (Home Farm) which could accommodate companies with an interest in waste related research and innovation, providing a real opportunity to achieve the co-location objective of RSS Policy ENV14. This will assist Bradford to become a leading authority in waste and energy related research.
- **District Heating Provision:** High grade heat from the proposed Residual Waste Management Centre could be used to heat civic buildings and residential properties in Bradford. AVE has identified a deliverable route for a hot water or steam pipe network from the Esholt site to the Canal Road regeneration area and make this achievable. This could support Bradford's wider aspiration to deliver an Urban Eco-Settlement at Canal Road.
- **Apperley Bride Park and Ride:** A planning application has been submitted recently for a new rail station and associated Park and Ride facilities located immediately south of Esholt. The delivery of this transport infrastructure would provide the opportunity for existing WwTW employees and potential Residual Waste Management Centre employees to travel by a mode other than the private car to the site.

5.5 Summary

AVE considers that Esholt is a suitable location for waste management uses. The site proposed for development is previously developed land and surplus to operational requirements. A waste management use is also appropriate adjacent to a waste water treatment works. There are also significant synergy benefits that can be achieved which are beneficial to Bradford. This site would be an optimal environment for innovation in energy generation and process technologies, which could add to the diversification of Bradford's economy. It would also make a significant contribution to the heat and energy provision of proposed new communities in regeneration / growth areas.



Appendix

12. GOVERNMENT OFFICE FOR YORKSHIRE AND THE HUMBER



GOVERNMENT OFFICE
FOR YORKSHIRE AND THE HUMBER

Andrew Marshall
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22 January 2010

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Dear Andrew

**BRADFORD MDC
WASTE MANAGEMENT DPD: ISSUES AND OPTIONS PAPER (NOV 2009)**

Thank you for consulting the Government Office on the above document. The Government Office at this stage has an advisory role rather than one of making formal representations. We appreciate that this DPD is at an exploratory stage and therefore do not consider it to be appropriate to comment in detail. The comments are intended to help the Council as it progresses to the next stage of plan preparation.

The comments are based on an assessment of the general scope and content of the document, taking account of current guidance, including the tests of soundness in PPS12, and are without prejudice to any formal GOYH representations at later stages of the process.

We also attach a note produced by the Planning Inspectorate in 2009 *Examining the Soundness of Minerals and Waste Policies in Core Strategies*, which is also relevant to Waste DPDs. You will find it helpful to look at the content of this DPD and also the emerging Core Strategy (CS) in the light of this advice and we do not propose repeating the points raised in our comments. The questions at the end should be particularly useful.

You may also find it helpful to look at sound waste DPDs produced by other authorities: these can be accessed via the PAS website, although PINS does not advise using these as exemplars. These include in this Region the sound CS and Waste DPD adopted by Wakefield Council, together with the Inspector's reports.

Linkages with CS

In future versions of the waste DPD it will be important to make clear what is the intended relationship/coverage with regard to waste between this DPD and the CS. You consulted in 2008 on the waste issues and options for the CS and we understood that it would be dealing with strategic waste policy, including management of municipal waste and areas of search for strategic facilities. However, you now appear to be covering the strategic level in this DPD. We have no objection to this approach and would in this respect refer you to paragraph 2.1 of the PINS note. This states that where it is clear that waste strategy/policies are being provided in a separate or subsequent DPD, there is no need to do other than confirm this position in a general CS and we



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FOR YORKSHIRE AND THE HUMBER

suggest you consider the advice in this paragraph when firming up on the split between the two documents. You will, however, need to expand paragraph 3.17 to include the emerging CS strategic policies so as to provide a hook for this DPD. By the time this DPD is submitted, the CS strategic policies should be in place.

Vision & Objectives

This document should contain its own locally distinctive, realistic and inclusive vision of what Bradford will be like from the waste point of view at the end of the plan period. This vision should be developed from the vision in the Sustainable Community Strategy, the emerging spatial vision in the CS and the specific issues identified through consultation and from other strategies and the evidence base.

Likewise the objectives will need to stem from the vision and also reflect analysis of the district's unique spatial issues thus being locally distinctive.

Developing options

The LDF system requires the generation and evaluation of options and alternatives. In subsequent versions of the DPD you will need to set out information regarding your assessment of options and alternatives and their selection and rejection. This will also need to incorporate the site selection process. You should be able to show that the document is genuinely front-loaded with evidence of community involvement in the development of issues and alternative options and encouragement of a meaningful response based on a genuine choice of options.

Selection of the preferred approach should be progressed in comparison with the alternatives and with commitment growing at each stage. The decision making process should be transparent. Clear reasons will need to be given for the selection of options, together with a précis of the alternatives that were also considered. Sustainability appraisal is an important element of option appraisal and should look at all options including discounted ones.

Monitoring & Flexibility

The DPD will need to have clear mechanisms for implementation and monitoring and will need to be sufficiently flexible to cope with changing circumstances.

I hope you will find these comments helpful as you progress to the next stage of document preparation. I am happy to discuss these and any other issues with you.

Yours sincerely,

Yasin Raja

13. YORKSHIRE FORWARD

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Your Ref: TDP/P&P/LDF0WDPD/I&O
Our Ref: YF/10/23

25th January 2010

Dear Andrew.

WASTE MANAGEMENT DEVELOPMENT PLAN DOCUMENT (DPD): ISSUES AND OPTIONS CONSULTATION (REGULATION 25)

Thank you for seeking Yorkshire Forward's comments on the above document. The Agency welcomes the opportunity to comment on local planning policy formulation within the Yorkshire and Humber region as part of our role as a statutory consultee.

The document recognises the need to address the content of the Regional Spatial Strategy, which in turn recognises the influence of Waste Strategy 2007 and its general reference to the Waste Hierarchy. The document supports RES Objective 5D (i) and 5D (iv), which seek to mitigate greenhouse gas emissions and analyse and respond to flood risk associated with climate change.

In line with the waste hierarchy, we would wish to see consideration of the 'reduce element' where this can be applied. Similarly, YF would expect that the former proximity principle be adhered to, and that the proposals would seek to treat waste as close to the point of arising as possible. When considering the aims and objectives of the DPD, we would support the prospect of promoting waste reduction and considering this alongside proximity issues. In addition, we consider that Bradford's waste strategy would be supported by the introduction of buy recycled policies and the promotion of a green procurement programme.

In terms of the best approach to hazardous waste, if the quantities generated are small, it may be more sustainable to export this waste to specialist facilities outside the district, rather than develop a new plant which is only viable if supported by imports of waste from outside the district.

Finally, I hope the above comments are helpful in shaping the DPD and look forward to future opportunities for involvement in the Local Development Framework preparation process. Please do not hesitate to contact me if you have any comments or queries regarding this response.

Yours sincerely,



John Pilgrim
Senior Planning Executive

14. BURLEY PARISH COUNCIL

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Rep No	Date Entered	Officer

PLANNING SERVICE
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 20 JAN 2010

Form for commenting on the Core Strategy Issues and Options Further Consultation
 (9th November 2009 – 25th January 2010)

The Council is consulting on the Waste Management DPD: Issues and Options. The document that re available for public comment is the Waste Management: Issues and Options Report.

You may photocopy this form or obtain further copies free of charge from the Council. The form is also available to download on the Council's website on www.bradford.gov.uk/ldf. It is recommended that representations be made on this form as this helps us to consider your comments properly. If you find it easier to answer the questions on separate sheets please ensure you are clear about the question you are answering. Please complete the form in black ink, clear writing or typing to aid processing. If you require any assistance completing this form

Your Details:

Title *Mrs* Surname *Griffiths* Forename *Jo*

Address *Queen's Hall, Main Street*
Burley in Wharfedale LS29 7QY

Organisation: *Burley Parish Council*

Tele No: Home *—* Work *01943 864728* Mobile *07991 772181*

Fax: *—* Email: *parishclerk@burley-in-wharfedale.org*

1

Waste Management DPD: Issues and Options Paper

Key Questions

Bradford Council is seeking your views on the Waste Management Issues and Options raised within the Development Plan Document. (see www.bradford.gov.uk/df)

Cross-Boundary Considerations

1. How should BMDC 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.

Objectives

- 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 2028;
- 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.

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?

No

Forecast Future Waste Arisings

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

All Categories of Waste MSW and C&I Waste Only

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

All forecasts see an increase in waste should we not be aiming to reduce targets?
Why is construction/demolition so high?
Should not more recycling on site be carried out?

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

Yes No

don't know

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 of minimising waste arisings that the Council should promote in the DPD?

Reduction in packaging and encourage this at the national legislative level.
Promote recycling eg cheap compost bins.

Regional and National Policy

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

Yes

No

Agricultural and Other Waste

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?

Yes

No

ISSUES AND OPTIONS

ISSUE 1: INTERNAL WASTE MANAGEMENT	
Option 1	Option 3
Focus on consolidating and increasing capacity at existing facilities across the District, and recognise that some waste will need to be managed outside Bradford.	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.
Option 2	Option 4
Provide additional sites and capacity to manage growing waste arisings within the District.	Work with adjacent authorities to identify appropriate sites / facilities to accommodate waste arisings as closely as possible to their source.
Option 5	Question 9
Minimise waste production / arisings across the District through appropriate planning policies, therefore minimising site allocations required.	Which Option or combination of options for Issue 1 are the most appropriate and why? <i>Option 4 + 5</i>
Question 10	Question 11
Assuming Option 2 and/or 3 are preferential, what type of facilities should be provided.	What other options should be considered?

ISSUE 2: LOCATION OF WASTE SITES	
Option 1	Option 2
Concentrate waste management facilities in a small number of strategic sites / locations.	Identify a large number of small sites dispersed across the District for waste management purposes.
Question 12	Question 13
Which option for Issue 2 is the most appropriate and why? <i>Option 2</i>	Should different approaches be applied to different waste streams? <i>Yes there may be economies of scale for some streams</i>
Question 14	
Are there any other options that should be considered for Issue 2?	

ISSUE 3: IDENTIFYING SITE FOR WASTE MANAGEMENT FACILITIES	
Option 1	Option 2
Test all sites on the initial long list within the area of search, excluding those in the Green Belt other than existing facilities.	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 Alternative options?	
<p>Option 1 Option 2 if for very good reasons the first is not possible. Sites should be near where waste is generated.</p>	

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES	
Option 1	Question 16
Test the long list of potential waste sites (appendix 1) against the Municipal Solid Waste and Commercial & Industrial waste facility location criteria as identified.	Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?
	<p>Unlikely to comment</p>

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE	
Option 1	Option 2
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.	Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.
Option 3	
Combination of Options 1 and 2.	
Question 17	
Which option do you consider the most appropriate and why?	
<p>Option 1</p>	
Question 18	
Are there any other option that should be considered?	
<p>—</p>	

ISSUE 6 MANAGEMENT OF 'OTHER' WASTE STREAMS	
Option 1	Option 2
Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period	Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.
Option 3	Option 4
Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.	Develop a policy approach combining either Option 1 or 2 with Option 3.
Question 19	Question 20
Which option do you consider the most appropriate for Issue 6 and why? <i>option 3</i>	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? <i>It is certainly desirable</i>
Question 21	
Should the DPD consider any other types of waste? <i>✓</i>	

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE	
Option 1	Option 2
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.	Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.
Option 3	Option 4
Provide a combination of both Options 1 and 2.	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	Question 23
Which option do you consider the most appropriate for Issue 7 and why? <i>option 1</i>	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?	
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Please note that representations cannot be treated as confidential and a schedule of all representations received will be published

● Please detach the completed comment form and return by Monday 25th January 2010 to:

Bradford Local Development Framework Group
FREEPOST NEA11445
PO BOX 1068
BRADFORD,
BD1 1BR
email: ldf.consultation@bradford.gov.uk
Fax 01274 433767

Hand Deliver to the any of the districts planning offices in the City Centre, Keighley, Shipley and Ilkley.



15.0 ENVIRONMENT AGENCY

City of Bradford Metropolitan District Council	Our ref:	RA/2006/100240/OT-01/IS1-L01
Development Services	Your ref:	November 2009
Jacobs Well	Date:	25 January 2010
Bradford		
West Yorkshire		
BD1 5RW		

Dear Sir/Madam

Waste Management DPD - Issues and Options

Thank you for consulting us on the Issues and Options for Bradford's Waste Management DPD. We have the following comments to make.

Waste Management

Cross-Boundary Considerations

We agree that Bradford should work closely with neighbouring local authorities in the areas listed. We would also like to see 'sharing information and experience of new waste technology' included in the list of actions.

There should be a joint approach to the management of specific waste streams in order to achieve the highest levels of resource recovery. For example, despite both waste wood and food wastes having recognised treatment technologies aimed at removing them from residual waste streams, a large percentage is still disposed of as residual waste.

Objectives – waste as a resource

The objectives for waste management make sense but we would like more emphasis on waste as a resource. We would add to the list of objectives: 'To consider and plan for the use of waste as a raw material/energy source for local industry both existing and new'.

Waste Capacity

The figures presented on the current situation are reasonable and we agree that most waste is transferred and treated or disposed of outside the district. We have recently issued a permit for waste treatment by autoclave in central Bradford with a permitted capacity of 320,000 tonnes per annum of municipal or commercial residual

Environment Agency
Phoenix House, Global Avenue, Leeds, LS11 8PG.
Customer services line: 08709 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
Cont/d..

waste. This facility is not yet operational but once it is it has the potential to make a significant contribution to the aim of managing waste with the district.

Waste Forecasting

The approach to forecasting is reasonable. As the document states, information on construction and agricultural waste is not so reliable and is also dependent on economic activity. We will keep you informed as new data becomes available.

Planning Approaches

The council could promote sustainable construction through a Supplementary Planning Document. This document could flag the need for Site Waste Management Plans and good building design so as to encourage and facilitate waste segregation.

Internal Waste Management

We support Bradford's commitment to take responsibility for its own waste by providing facilities within the district but would ask that development of waste capacity (both public and private) in other districts is kept in view so as to achieve the most sustainable solution.

Location of waste Sites

The chosen solution must be the one that extracts the most value from waste and is also flexible enough to accommodate advances in technology and changes in waste composition.

Locational Criteria for municipal solid waste and commercial industrial waste management facilities

Any waste management facility would be subject to a permit under the environmental permitting regulations. The objective of the permit is to prevent harm to the environment or human health. For incinerators emission limits are set to comply with those in the Waste Incineration Directive which are based on World Health Organisation Standards. A permit would not be issued in a particular location if air quality standards would be breached as a result of the installation.

Impacts can be considered in the context of the controls required by the permit:

- Emission limits for air (with an assessment against the Waste Incineration Directive), land and water.
- An odour management plan
- A noise assessment
- A consideration of energy efficiency
- A consideration of how to minimise waste produced and raw material used.
- An Environmental Management System
- An accident management plan
- Requirement to use 'Best Available Techniques' to ensure compliance.

The Health protection Agency have issued guidance on the potential health effects of modern waste incinerators : Below is the first paragraph of the summary of the report '*The Impact on Health of Emissions to Air from Municipal Waste Incinerators*' - Health Protection Agency - September 2009'

Cont/d..

'The Health Protection Agency has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health. While it is not possible to rule out adverse health effects from modern, well regulated municipal waste incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that modern and well managed municipal waste incinerators make only a very small contribution to local concentrations of air pollutants.'

We accept that permits cannot control the public's perception of how their quality of life is affected by a facility because the experience of odour or noise for example is personal. There may be no direct threat to health or environment but some people may still find the facility unacceptable. We would advise separating odour from air emissions as an impact, experience tells us that odour is the most common cause of complaint and has to date been more of a problem with technologies designed to handle large quantities of mixed biodegradable waste.

Proximity to markets/uses for heat or recycle should be considered when assessing sites for locating waste management sites. The closer the end user of any heat or recycle the more sustainable the transaction to the end user.

There is no specific criterion for flood risk. Please see the section at the end of this letter on the requirements of PPS25: Development and Flood Risk.

Management of Construction and Demolition Waste

We agree that the first priority is to reduce and reuse construction waste on site through the use of sustainable construction methods and site waste management plans. A building materials reuse infrastructure should be encouraged - some councils are considering building material 'shops' at civic amenity sites.

Reuse and recycling on site is the most sustainable option but sometimes this is not viable on smaller construction sites. Lots of unsorted builders waste is still landfilled and it is widely fly tipped. In order to increase recycling and reduce fly tipping we would advocate some offsite provision for small builders.

Management of 'other' waste streams

Hazardous waste

Planning provision for hazardous waste management is likely to benefit from regional consultation and consultation with neighbouring authorities. Sites for a proposed hazardous waste facility would be subject to rigorous environmental risk assessments before a permit could be granted. This should be borne in mind when proposing sites for hazardous wastes.

Agricultural waste

We agree that criteria based policies would be better for agricultural waste. We have little reliable data on agricultural waste but anecdotally our feeling is that some types of agricultural waste are being dealt with on farms and that there is increasing interest in anaerobic digestion and composting for dealing with slurries and

Cont/d..

vegetable waste, on a relatively small scale. Criteria based policies which recognise the impacts of these types of technologies would prove useful.

Other types of agricultural waste such as packaging, scrap metal and construction waste are more likely to be dealt with off farm as commercial industrial waste.

Management of Residual Waste

There is certainly still scope for reducing the amount of 'residual waste' which needs to be dealt with. Plans are in place to increase recycling of MSW. The position with Commercial Industrial and Construction waste however is less clear. The first step should be to ensure that all waste is treated as far up the hierarchy as possible, and that as much as possible is reused or recycled.

An emerging issue over the past 12 months has been the disposal or further treatment of the outputs from Mechanical Biological Treatment and Autoclave type facility commonly referred to as Compost Like Output or in some cases Refuse derived Fuel. These outputs remain waste and as such require waste permits for their onward treatment or disposal. They cannot be spread to land without authorisation or burned for energy except in a Waste Incineration Directive compliant incinerator.

There is a need to plan for productive outlets for these residual wastes, alongside the proposals for initial treatment.

Landfill is a last resort and any requirement for further capacity should be assessed on this basis.

Flood Risk

The issues and options document does not mention flood risk, which is an important consideration in locating waste management sites. Please see the following comments on flood risk.

Sequential Test and Exception Test

Any development proposed in either high risk flood zone 3 or medium risk flood zone 2 must pass the Sequential Test and where necessary the Exception Test, as outlined in Planning Policy Statement 25 (PPS25).

PPS25 advocates a sequential approach to siting developments with preference given to those sites in low risk flood zone 1 (defined as having a less than 1 in 1000 annual probability of river flooding in any year). Only where no reasonably available alternative sites are available in flood zone 1 should consideration be given to locating development in medium risk flood zone 2 (defined as having between a 1 in 100 and 1 in 1000 annual probability of river flooding in any year). Development should only be considered in high risk flood zone 3 (defined as having a 1 in 100 year or greater annual probability of river flooding in any year) where there are no reasonably available alternative sites in either flood zones 1 or 2. See Annex D of PPS25 for further information.

PPS25 classifies landfill and waste management facilities for hazardous waste as uses which are 'more vulnerable' to flood risk. All other waste treatment sites are

classified as being 'less vulnerable' to flood risk. When assessing potential waste management sites consideration must be given to the flood risk vulnerability classification PPS25 has assigned the proposed use. A 'more vulnerable' use proposed in high risk flood zone 3a which passes the Sequential Test, must then go on to pass the Exception Test (Table D.3, paragraph D9). Neither 'more' or 'less' vulnerable development (i.e. any type of waste site) is permissible in flood zone 3b – classed as 'functional floodplain'.

Site Specific Flood Risk Assessment

All development proposals in medium risk flood zone 2 and high risk flood zone 3 must be accompanied by an FRA which demonstrates that the development can remain safe in the event of a flood and will not increase flood risk to the site or elsewhere.

All development proposals over one hectare in flood zone 1 must also be accompanied by an FRA. In this case the FRA should demonstrate that surface waters will be managed to avoid increased flood risk to the site or elsewhere.

Flood risk assessments should be carried out to the appropriate degree of detail and assess the risks of all forms of flooding to and from development and must take climate change into account, as required by PPS25.

Those developments within flood zones 2 and 3 which pass the Sequential Test and where necessary the Exception Test, must adopt a sequential approach to site layout. The site layout must aim to keep those elements of the development most vulnerable to flooding in the lowest flood risk areas of the site. The development should also have appropriate mitigation measures to reduce the impact of flood events.

Should you require any additional information, or wish to discuss these matters further, please contact me on the number below.

Yours sincerely

Sally Armstrong
Planning Liaison Officer
Direct dial 0113 213 4923 Direct fax 0113 213 4609
Direct e-mail sally.armstrong@environment-agency.gov.uk

End

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16. COAL AUTHORITY



BRADFORD WASTE MANAGEMENT DPD ISSUES & OPTIONS FURTHER CONSULTATION

Consultation Deadline – 25 January 2010

The following contact details are the only ones you need for planning related matters, therefore please amend your database if necessary.

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

Person Making Comments

Mark Harrison
Planning Liaison Officer

BACKGROUND ON THE COAL AUTHORITY

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues and provide information on coal mining.

The Coal Authority set up a new Planning and Local Authority Liaison Department in 2008 to re-engage with the three planning systems across England, Scotland and Wales. The main areas of planning interest to The Coal Authority in terms of policy making relate to:

- the safeguarding of coal as a mineral in accordance with the advice contained in MPS1 and MPG3 in England; and
- ensuring that future development is undertaken safely and reduce the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in PPG14 and MPG3 in England.

COMMENTS ON THE BRADFORD WASTE MANAGEMENT DPD ISSUES & OPTIONS FURTHER CONSULTATION

Surface Coal Resources and Prior Extraction

Although it is acknowledged that the Bradford Waste Management DPD does not cover minerals specifically as this is contained within the Core Strategy and subsequent Land Allocations DPD you will be aware, the Bradford area contains coal resources which are capable of extraction by

surface mining operations. This information is available to Mineral Planning Authorities free of charge from The Coal Authority following signing a data sharing licence and was given to City of Bradford Metropolitan District Council on the 4 September 2008.

The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In instances where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers' website at www.coalpro.co.uk/members.shtml.

As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

The surface coal safeguarding issues that impact on the Waste Management DPD are as follows:

Representation No.1

Comment – The Coal Authority has only the following general comment to make regarding the presence of surface coal resources in relation to the Waste Management DPD at this early stage.

The Bradford MDC area contains significant areas of surface coal resource which, in accordance with the requirements of MPS1 to safeguard energy mineral resources, should be identified within some part of the Bradford LDF as Minerals Safeguarding Areas (MSA). Locating waste facilities in these MSAs should ideally be avoided in the first instance. However, the area of surface coal resource in Bradford is extensive, and it is acknowledged that development associated with waste management may have to be proposed within the surface coal MSA. In this instance, as required by MPS1, consideration will need to be given to the prior extraction of the surface coal resource in order to avoid the unnecessary sterilisation of the nation's asset.

Whilst researching the wider Bradford LDF in order to provide context to this Waste Management DPD Issues & Options consultation The Coal Authority was concerned to note that the Core Strategy Issues and Options consultations of February 2007 and November 2008, whilst noting in the Minerals Topic Paper at paragraph 2.11 that coal resources exist in the area, failed to acknowledge the requirement of MPS1 to safeguard those resources for the future through the LDF. The Coal Authority expects that this significant omission will be addressed through the Core Strategy Preferred Options report, when it is published for consultation later in the year. We would refer you to the BGS publication *A Guide to Mineral Safeguarding in England* (October 2007) for guidance on how to address mineral safeguarding through the various components of the LDF.

Reason – In order for the overarching approach in the Bradford LDF to fully accord with the requirements of MPS1 regarding safeguarding of mineral resources.

Coal Mining Legacy

As you will be aware, the Bradford area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area where coal exists near to the surface, including existing residential areas. The new Planning Department at The Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface

can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million properties of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas needs to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.

Within the Bradford area there are approximately 2,850 recorded mine entries and around 28 coal mining related hazards. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy is as a result of mineral workings it is important that new development delivered through the Local Development Framework, recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

The mining legacy issues that are relevant to the Waste Management DPD are as follows:

Representation No.2

Comment – The Bradford MDC area has a significant legacy of past coal mining activity, including more than 2,850 recorded mine entries, which needs to be fully considered when identifying potential sites for development associated with waste management. Whilst these coal mining legacy issues are spread throughout the authority area, there is a significant concentration towards the south east of the area, around the City of Bradford.

The Coal Authority is therefore pleased to note at paragraph 5.10 of the Waste Management DPD that ground stability has been used as an initial factor in identifying areas of search for the location of waste sites. The Coal Authority would recommend that ground conditions and land stability is used by the Council as a key criterion for assessing the appropriateness of sites for any form of development associated with waste management.

Reason – In order to address the requirements of PPG14: Development on Unstable Land.

CONCLUSION

The Coal Authority welcomes the opportunity to make these early comments, we are of course willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of its concerns.

Thank you for your attention.

MARK E. N. HARRISON BA(Hons), DipTP, MRTPI
Planning Liaison Officer
Planning and Local Authority Liaison

17. MINERALS PLANNING GROUP

FOR OFFICE USE ONLY		
Rep No.	Date Entered	Officer

Form for commenting on the Core Strategy Issues and Options Further Consultation

(9th November 2009 – 25th January 2010)

The Council is consulting on the Waste Management DPD: Issues and Options. The document that are available for public comment is the Waste Management: Issues and Options Report.

You may photocopy this form or obtain further copies free of charge from the Council. The form is also available to download on the Council's website on www.bradford.gov.uk/ldf. It is recommended that representations be made on this form as this helps us to consider your comments properly. If you find it easier to answer the questions on separate sheets please ensure you are clear about the question you are answering. Please complete the form in black ink, clear writing or typing to aid processing. If you require any assistance completing this form

Your Details:

Title...MR... Surname.....MILLMORE..... Forename...MARTIN.....

Address..., FOX BROW, BROW LANE, CLAYTON.....

...BRADFORD, WEST YORKSHIRE, BD14 6PT.....

Organisation: THE MINERAL PLANNING GROUP

Tele No: Home.....Work.....01274 884599/884699 ...Mobile.....

Fax: ...01274 884664.... Email:martin@mpg.yorks.com...

PLANNING SERVICE
RECEIVED
21 DEC 2009

1

Waste Management DPD: Issues and Options Paper

Key Questions

Bradford Council is seeking your views on the Waste Management Issues and Options raised within the Development Plan Document. (see www.bradford.gov.uk/idf)

Cross-Boundary Considerations

1. How should BMDC 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.

Objectives

- 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.

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?

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.....

Forecast Future Waste Allocations

<p>3. Do we need to allocate sites for all categories of waste or do we just need to allocate site for MSW and C&I waste? All Categories of Waste <input checked="" type="checkbox"/> MSW and C&I Waste Only <input type="checkbox"/></p> <p>ALLOCATIONS SHOULD BE MADE FOR ALL WASTE TYPES IN ORDER TO REALISTICALLY PLAN FOR THE FUTURE</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>	<p>5. Are the levels of waste to be planned for within the DPD realistic or should we be planning for different levels of waste? If so, what level of waste do you see as being more appropriate / realistic?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
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<p>4. Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste) categories of waste? Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<p>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 of minimising waste arisings that the Council should promote in the DPD?</p> <p>CO-MINGLING COLLECTIONS AND RECYCLING</p>
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Regional and Domestic Waste	Agricultural and Other Waste
<p>7. Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and re-use of waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>THERE NEEDS TO BE FLEXIBILITY IN BRADFORDS ATTITUDE TOWARD DEVELOPMENT OF RECYCLING FACILITIES WITHIN WORKED OUT QUARRIES ALBEIT THAT</p> <p>No <input type="checkbox"/></p>	<p>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? Yes <input type="checkbox"/> No <input type="checkbox"/></p>

THEY ARE OFTEN LOCATED IN THE GREEN BELT

ISSUES AND OPTIONS

ISSUE 1: INTERNAL WASTE MANAGEMENT	
Option 1	Option 3
Focus on consolidating and increasing capacity at existing facilities across the District, and recognise that some waste will need to be managed outside Bradford.	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.
Option 2	Option 4
Provide additional sites and capacity to manage growing waste arisings within the District.	Work with adjacent authorities to identify appropriate sites / facilities to accommodate waste arisings as closely as possible to their source.
Option 5	Question 9
Minimise waste production / arisings across the District through appropriate planning policies, therefore minimising site allocations required.	Which Option or combination of options for Issue 1 are the most appropriate and why?
Question 10	Question 11
Assuming Option 2 and/or 3 are preferential, what type of facilities should be provided.	What other options should be considered?

ISSUE 2: LOCATION OF WASTE SITES	
Option 1	Option 2
Concentrate waste management facilities in a small number of strategic sites / locations.	Identify a large number of small sites dispersed across the District for waste management purposes.
Question 12	Question 13
Which option for Issue 2 is the most appropriate and why?	Should different approaches be applied to different waste streams? YES - GREEN WASTE RECYCLING FOR INSTANCE SHOULD OCCUR AWAY FROM RESIDENTIAL/INDUSTRIAL AREAS - IT IS BEST PLACED IN THE COUNTRYSIDE WHICH IS LIKELY TO BE GREENBELT.
Question 14	
Are there any other options that should be considered for Issue 2? YES - BEST SOLUTION IS PROBABLY A COMBINATION OF 1 + 2.	

ISSUE 2 IDENTIFYING SITE FOR WASTE MANAGEMENT FACILITIES	
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.	Option 2 Test all sites on the initial long list, including new potential sites in the Green Belt.
Question 14 Which option is the most appropriate and Why? Are there Alternative options? MUST FOLLOW OPTION 2 OR OPPORTUNITIES TO UTILISE WORKED-OUT MINERAL SITES WILL BE LOST OR RESTRICTED. MINERAL SITES CAN ONLY HAVE BEEN APPROVED IF THEY HAVE NO UNACCEPTABLE IMPACTS AND THUS ARE OFTEN WELL-SUITED FOR THE ESTABLISHMENT OF WASTE MANAGEMENT FACILITIES	

ISSUE 3 LOCATION CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES	
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 15 Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?

ISSUE 4 MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE	
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.	Option 2 Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.
Option 3 Combination of Options 1 and 2.	
Question 17 Which option do you consider the most appropriate and why? OPTION 1 APPEARS TO BE SENSIBLE BUT ONLY REALLY APPLIES TO LARGE DEMOLITION PROJECTS. THE BULK OF C+D WASTE STILL COMES FROM A PLETHORA OF SMALL SITES WHERE ON-SITE RECYCLING IS IMPRACTICAL + UNACCEPTABLE	Question 18 Are there any other option that should be considered? C+D WASTE RECYCLING + DISPOSAL FACILITIES CAN BE LOCATED IN DISUSED (AND INDEED SOME ACTIVE) QUARRIES. POLICIES SHOULD NOT DISMISS THIS OPTION.

ISSUE 6 MANAGEMENT OF OTHER WASTE STREAMS	
Option 1	Option 2
Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period.	Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.
Option 3	Option 4
Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.	Develop a policy approach combining either Option 1 or 2 with Option 3.
Question 19	Question 20
Which option do you consider the most appropriate for Issue 6 and why? <p>THE OPTION 1 SCENARIO IS COULDED IN NEGATIVE COMMENTS. HAZARDOUS WASTE ARISING SHOULD WHEREVER PRACTICAL POSSIBLE BE DEALT WITH WITHIN THE DISTRICT AND NOT TRANSPORTED VAST DISTANCES.</p>	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? <p>NO - THERE MAY BE A NEED FOR NEW FACILITIES. NOT ALL FARMS ARE SUITABLE FOR DISPOSAL AT THE POINT OF ORIGIN.</p>
Question 21	
Should the DPD consider any other types of waste? <p>YES - GREEN WASTE</p>	

Which option do you consider the most appropriate for Issue 7 and Option 1	For Issue 7 Option 2, should additional capacity be identified in existing Option 2ies?
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.	Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.
Option 3	Option 4
Provide a combination of both Options 1 and 2.	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 24	
Question 25	
Are there other options that should be considered for Issue 7? Which option do you consider the most appropriate for Issue 7 and why? <p>OPTION 1 - ENCOURAGES FLY-TIPPING OPTION 2 - BEST OPTION OPTION 4 - UNSUSTAINABLE DUE TO EXCESSIVE TRANSPORT DISTANCES</p>	

Please note that representations cannot be treated as confidential and a schedule of all representations received will be published

Please detach the completed comment form and return by Monday 25th January 2010 to:

Bradford Local Development Framework Group
FREEPOST NEA11445
PO BOX 1058
BRADFORD,
BD1 1BR
email: ldf.consultation@bradford.gov.uk
Fax 01274 433767

Hand Deliver to the any of the districts planning offices in the City Centre, Keighley, Shipley and Ilkley.

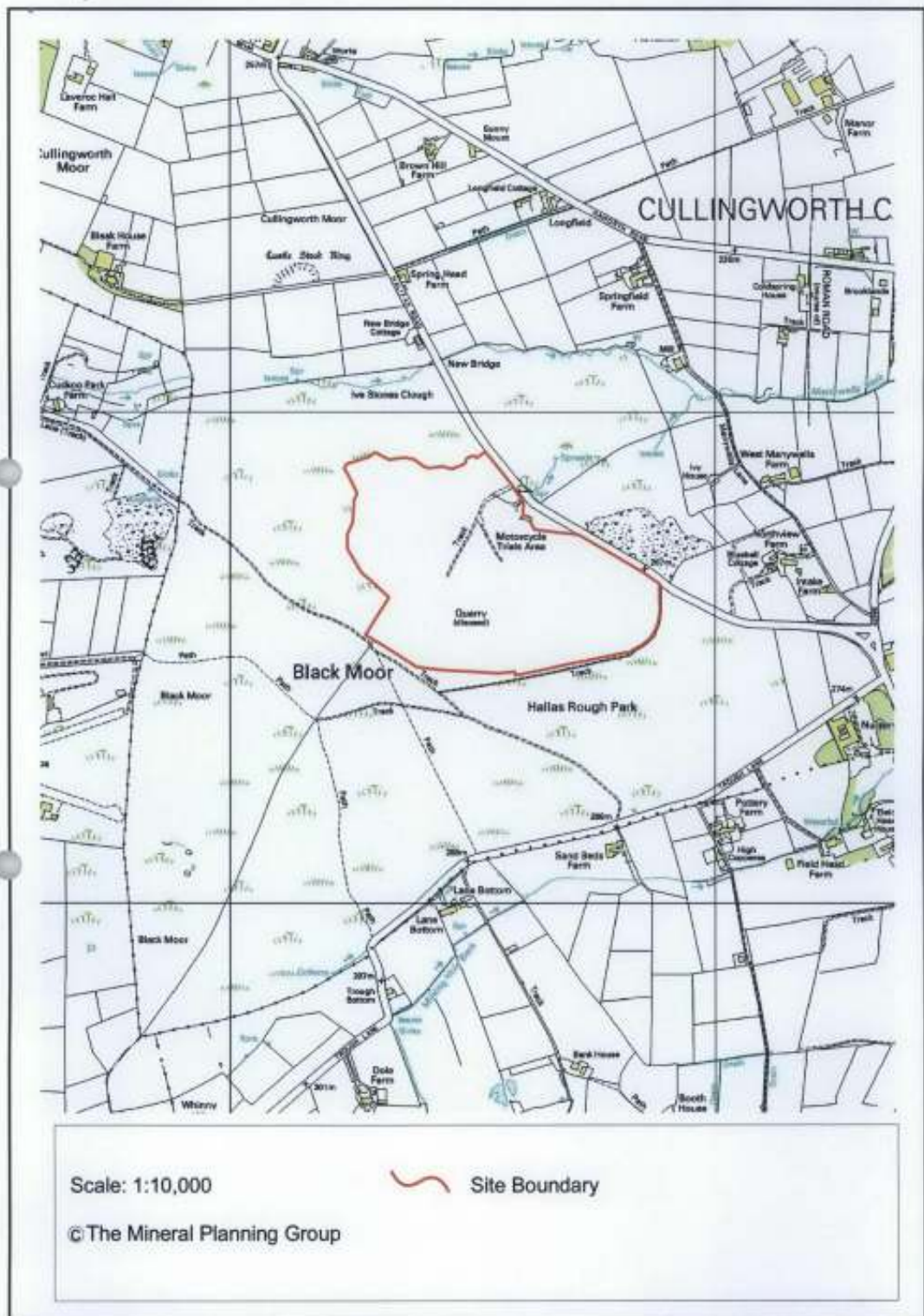
Fox Brow, Brow Lane, Clayton, West Yorks, BD14 6PT
 Tel: 01274 884599/884699 Mobile: 07702 194350
 Fax: 01274 884664 Email: mpgroup@mpg.yorks.com
 Website: <http://www.mpg.yorks.com>
 Branch office at: Lewes, East Sussex



The Mineral Planning Group
 GEOLOGICAL, MINING, PLANNING & ENVIRONMENTAL CONSULTANTS

Call for Sites

Name of Site	Hallas Rough Quarry
Location	Adjacent to the A629 Halifax Road 1km to the south west of the village of Cullingworth.
Size	21 hectares (see plan attached)
Current Use	Previously worked-out quarry that is currently utilised as an illegal/unauthorised motorbike scrambling area.
Type of Potential facility	The restoration of this site offers an infill opportunity to the Council as it is a large site that is impractical to restore at low-level.
Capacity of Potential Site	1.2 million cubic metre void space, which would hold 2.4 million tonnes of inert C&D material. There is also the potential for the recycling of a proportion of waste entering the site to produce secondary aggregate in accordance with Government recommendations/guidance.
Potential Waste Types	Construction and Demolition waste (inert material only).
Further Information	A Planning application and ES is currently being prepared for a restoration of the Hallas Rough site based on the above figures which is likely to be submitted early 2010.



18. Bradford Urban Wildlife Group



still not available.. Perhaps you could sort this out. There was also no copy in the Central Library (I had to access a hard copy in the Planning office anyway). It is not easy to read a free Document on the web - & downloading is expensive & time. I like a hard copy to make notes etc - as usual.

- so I would be grateful if in future you could send me a hard copy (of the next one) without a phone call.

Sincerely, & in haste
Susan (Stead)

FOR OFFICE USE ONLY		
Rep No	Date Entered	Officer

City of Bradford Metropolitan District Council

RECEIVED www.bradford.gov.uk

25 JAN 2010

Form for commenting on the Waste Management DPD Issues and Options Consultation

(9th November 2009 – 25th January 2010)

The Council is consulting on the Waste Management DPD Issues and Options. The document available for public comment is the Waste Management Issues and Options Report.

You may photocopy this form or obtain further copies free of charge from the Council. The form is also available to download on the Council's website on www.bradford.gov.uk/ldf. It is recommended that representations be made on this form as this helps us to consider your comments properly. If you find it easier to answer the questions on separate sheets please ensure you are clear about the question you are answering. Please complete the form in black ink, clear writing or typing to aid processing. If you require any assistance completing this form or would like a copy in large print, Braille etc, please contact the LDF Group on 01274 432499.

Data Protection Act 1998

Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purpose of preparing the Local Development Framework.

Your Details:

Title MRS Surname STEAD Forename SUSAN
 Address 178 WARREN LANE ELDWICK
BINGLEY B.P.16. 389
 Organisation: Bradford Urban Wildlife Group
 Tele No: Home (01274) 774912 Work Mobile 07789
660574
 Fax Email

Waste Management DPD: Issues and Options Paper

Key Questions

Bradford Council is seeking your views on the Waste Management Issues and Options raised within the Development Plan Document. (see www.bradford.gov.uk/df)

Cross-Boundary Considerations

1. How should BMDC 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.

Objectives

- 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.

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?

I believe the Bradford District is coping better than some authorities once the collection and the recycle more domestic waste has been addressed particularly in the Bradford District (the latter being the first to provide a paper Bin). The problem is Supermarkets who aim to provide people with a reusable shopping bag, but do not enforce this as a necessity.

Forecast Future Waste Arisings

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

All Categories of Waste MSW and C&I Waste Only

Domestic waste should be cut even further than at present by the removal of plastic containers from many items in Supermarkets. It is use their food waste in the right way thus reducing the necessity of more all-land sites.

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

These are realistic. As a society we are producing more waste than necessary.

The Education of the public, Industry and

<p>Education of the public and Industry is the way forward.</p>	<p>The Jointing Communities should be an essential plan forward. There is nothing in the Document concerning the education of the public.</p>
<p>4. Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste) categories of waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>We are a "throwaway" Society and this should be a way of thinking which should change. Unfortunately our Economy is built upon it.</p>	<p>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 of minimising waste arisings that the Council should promote in the DPD? As mentioned above to try and educate and encourage people - Companies etc to cut down their waste. Individually - or Industry</p>
<p>Regional and National Policy</p> <p>7. Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and re-use of waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>Agricultural and Other Waste</p> <p>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? Yes <input type="checkbox"/> No <input type="checkbox"/></p>

ISSUES AND OPTIONS

ISSUE 1: INTERNAL WASTE MANAGEMENT	
Option 1 ✓	Option 3
Focus on consolidating and increasing capacity at existing facilities across the District and recognise that some waste will need to be managed outside Bradford.	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.
Option 2	Option 4
Provide additional sites and capacity to manage growing waste arisings within the District.	Work with adjacent authorities to identify appropriate sites / facilities to accommodate waste arisings as closely as possible to their source.
Option 5 ✓	Question 9
Minimise waste production / arisings across the District through appropriate planning policies, therefore minimising site allocations required.	Which Option or combination of options for Issue 1 are the most appropriate and why? Option 1 and Option 5 because there is not enough room in the District for additional sites and having to accommodate waste closely to their source could damage the environment.
Question 10	Question 11
Assuming Option 2 and/or 3 are preferred, what type of facilities should be provided?	What other options should be considered? Simply increase capacity at existing sites and expect to send some waste to be managed outside Bradford.

ISSUE 2: LOCATION OF WASTE SITES	
Option 1 ✓	Option 2
Concentrate waste management facilities in a small number of strategic sites / locations.	Identify a large number of small sites dispersed across the District for waste management purposes.
Question 12	Question 13
Which option for Issue 2 is the most appropriate and why? Concentration of a small number of sites is more environmentally acceptable. We do not have the room for a large number.	Should different approaches be applied to different waste streams? I think there has to be in certain cases.
Question 14	
Are there any other options that should be considered for Issue 2?	

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES	
Option 1	Option 2
Test all sites on the initial long list within the area of search, excluding those in the Green Belt other than existing facilities. ✓	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 Alternative options? Option 1 We do not agree with new potential sites in the Green Belt. Development cannot take place within the Green Belt, so why should waste facilities be allowed? Many wildlife sites & sites of Ecological importance	as situated in the Green Belt.

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILITIES	
Option 1	Question 16
Test the long list of potential waste sites (appendix 1) against the Municipal Solid Waste and Commercial & Industrial waste facility location criteria as identified. Appendix 1 - S/E1.6. John Street Road; This is not advisable to place on this list. Too near. Bungla South Bog str I. Not suitable for waste facilities.	Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required? Sites should not be allocated in sensitive ecological areas. L17 needs to be checked out with sensitivity in mind.

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE	
Option 1 ✓	Option 2
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.	Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.
Option 3	
Combination of Options 1 and 2.	
Question 17	
Which option do you consider the most appropriate and why? Recycling & re-use ideally should be done on site if possible.	Question 18
	Are there any other options that should be considered?

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS	
Option 1	Option 2 ✓
Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period	Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.
Option 3	Option 4
Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.	Develop a policy approach combining either Option 1 or 2 with Option 3.
Question 19	Question 20
Which option do you consider the most appropriate for Issue 6 and why? <i>option 2. How much hazardous waste are we producing now!! produce in future? Can it not be cut down -</i>	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? <i>yes - it is appropriate.</i>
Question 21	
Should the DPD consider any other types of waste? <i>I think the DPD has listed most of the waste streams affected.</i>	

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE	
Option 1 ✓	Option 2
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.	Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.
Option 3	Option 4
Provide a combination of both Options 1 and 2.	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	Question 23
Which option do you consider the most appropriate for Issue 7 and why? <i>option 1. The other options advise that we cannot cut down our waste and it will increase over the years. Since the Council's intention is to send less</i>	For Issue 7 Option 2, should additional capacity be identified in existing or new sites? <i>waste to landfill sites option 2 + 4 combined this aspiration</i>

Question 24	
Are there other options that should be considered for Issue 7?	
<p>The way forward is surely</p> <ol style="list-style-type: none"> 1. Waste prevention - educate public etc 2. Re-use 3. Recycle - compact 4. Although we do not have the room for more landfill sites - those that are in use should be restored to a natural landscape for encouraging Biodiversity. 5. Tyre alternative technologies & Biological Treatment. 	

Please note that representations cannot be treated as confidential and a schedule of all representations received will be published

Please detach the completed comment form and return by Monday 25th January 2010 to:

Bradford Local Development Framework Group
 FREEPOST NHA11446
 PO BOX 1008
 BRADFORD,
 BD1 1BR
 email: ldf.consultation@bradford.gov.uk
 Fax 01274 433787

Hand Deliver to the any of the districts planning offices in the City Centre, Keighley, Shipley and Ilkley.

19. Waste Disposal Authority (WDA)

City of Bradford Metropolitan District Council

www.bradford.gov.uk

DEPARTMENT OF ENVIRONMENT AND NEIGHBOURHOODS

Waste Management Issues and Options Comments from WDA January 2010

Strategic Objectives and Policy Options

There are no national quoted diversion targets for C&I, C&D wastes, this may not remain the case, in the interim the increase in landfill costs via the landfill tax escalator and requirement on construction sites for site waste management plan will see the commercial/regulatory drivers to divert more C&I and C&D wastes from landfill. In identifying the large quantities of C&I and C&D waste, clearly capacity to treat rather than landfill needs to be recognised and catered for in sites allocations, although it is accepted that much C&D waste will be treated and dealt with in the development site and will not require a specific site allocation.

Re hazardous wastes the sentiments expressed in 2.17 seem reasonable.
No comment re agricultural waste.

GVA Methodology Statement November 2009

List of technologies does not include autoclave (given that Bradford already granted planning permission for same – it seems an error to exclude), such technology could be on its own or a sub set of MBT. Does the search for sites not include landfill?

No mention of power and heat benefits from the various thermal processes in main text, though in point form in Fig 1.

The site sizes quoted in fig 1 are indicative or for guidance only, and should be viewed as such, in reality site size will be very much project specific.

2.7 Green belt – This paragraph needs further consideration, as clearly some current identified waste activities e.g. windrow composting and landfill, are activities better suited to green belt locations.

Given what is said in 2.7, what criteria will be used in determining the sufficiency of sites? (fig 11 and 12 are too small to fully understand). The issue surely is not one of just numbers, but appropriateness of location, accepting the need for constraints, eg within 1 km of major road networks. Consider if this issue is well enough explained.

2.1.2 the paragraph text is not completed.

Site survey form in Appendix A does not specifically note any sensitive receptors within say 250m e.g. school, food processing etc. The road assessment should be a bit more specific. All waste facilities will generate traffic including HGV; road assessments should

take account of estimated highway widths and carrying capacity, and other constraints such as weak bridges with weight limits, or low bridges which may restrict HGV access.

Comment on fig 2.0 Locational Criteria

All waste activities can create some air pollution – a dirty MRF must create PM10 particulates for example, and is this air pollution any worse than MBT? If it is then there is a need to explain it, as the table seems too simplistic. EPW will create some dioxins, how do you weight this compared to PM10?

How is sustainability measured and criteria is it that allows a clean MRF to be close to waste arisings and MBT not? What is the base data which dictates where the ticks are allocated (WRATE?).

WM DPD – Issues and Options Nov 09

Question 1

Joint working with neighbouring councils is a 2 way process and we need to understand their views on working with us. As waste has impacts beyond the development site (traffic and emissions) consideration of neighbouring LPA's will be needed in determining waste applications, we should be open to working with neighbouring LPA's on as many levels as possible to assist in determining applications, however possible sites and policies within Bradford district are a matter for Bradford.

Comment - Chapter 2 the waste forecasting needs to be revisited (MSW over estimates) some of the values in the table dated 2005! In 2.7 given that there is still plenty of landfill (including active waste) in the sub region, Bradford is likely to continue to export residual waste arising from waste treatment activities, and thus should not be criticised for such export of residual wastes into the sub region.

Question 2

No Comment.

Question 3

No

Question 4

Yes

Question 5

Concern over levels of waste predictions, this forecasting needs to be remodelled using more up to date values. It may be helpful to understand how other LPA's are forecasting waste growth.

Question 6

Over the full spectrum of planning development, waste prevention, re use, recycling needs to be considered as part of proposed development.

Chapter 4

Comment - MSW values and % recycled can be updated via data held by waste management (4.9, 4.10).

Question 7

No

Question 8

Yes

Question 9

Issue 1

Accepting that Bradford has to become more self sufficient in waste provision, and also plan for the future, it must first aspire to option 5, after this option 1 and 2 will be needed. Option 3 may be of interest only if there are sound environmental, economic and employment benefits in dealing with waste imports.

Question 10

We should not try to limit technology choice but seek to embrace all of those technologies previously described.

Question 11

Waste minimalisation policies

Question 12

Issue 2

Site sizes/ capacity can vary from 0.5h to 10.0h easily, so providing for only a small number of strategic (large) sites seems inappropriate, can compromise to some extent on proximity principles and desires to concentrate traffic and potential polluting activities, thus selecting option 2 but including also larger strategic sites seems more realistic approach to cater for the differing waste streams.

Question 13

Probably yes, as MSW treatment will require larger capacity facilities strategically sited.

Question 14

To combine both options.

Question 15

Issue 3

Would opt for option 2, to include very limited green belt to within say 1km of primary road network for limited waste management options (note comment in methodology statement 2.7), yet fully accepting the need for all other constraints also.

Question 16

Comment on the location criteria etc already made above.

Question 17

Preference is for option 3 as this seems the most flexible and complete position.

Question 18

No comment

Question 19

Issue 6

Option 2 – the small values of hazardous wastes and the many varying types of specialised treatments required makes new site identification as suggested in option 1 inappropriate.

Question 20
Yes

Question 21
No

Question 22

Option 1 would seem the most appropriate in having policies to reduce waste/residual wastes, but recognising that most waste treatment technologies will only divert between 80-95% of input away from landfill, leaving some of the residual still biologically active, but having no other practical economic means of disposal other than landfill. (See comment in Question 1 on sub regional landfill capacity and need to export residue to landfill). There should be consideration for an Option 1 + 4 in combination for Question 22.

Question 23

As Bradford doesn't have much landfill capacity (zero for active wastes?) any additional capacity will probably be new capacity if it is to be provided within the district (see response in Question 22).

Question 24

Option 1 + 4 combined.

Ian Bairstow
Strategic Director,
Environment & Neighbourhoods

Contact: Richard Longcake
Phone: (01274) 432855
E-mail: richard.longcake@bradford.gov.uk

20.0 Environment and Waste Management Improvement Committee

Environment and Waste Management Improvement Committee

Submission to the LDF Waste Management – Issues and Options consultation

Adopted by the Committee – 23 February 2010

General comments:

- Strengthen strategy for other than MSW
- Ensure Bradford MDC does take responsibility for all waste

Q1

- All actions listed should be explored with neighbouring authorities
- Need to learn lessons from the aborted interim waste contract
- Is there a contradiction between paragraphs 3.22 and 3.23?
- Council should consider commissioning a comprehensive academic-led review of its waste management strategies that assesses performance in relation to best practice worldwide, seeking to identify opportunities to incorporate lessons learnt

Q2

- No, even if a cheaper solution could well be to purchase LATS

(re: waste arisings, do we just dismiss agricultural waste in our forecasts?)

Q3

- Only 50% of Bradford MDC's waste is MSW and CI waste. We cannot dismiss the balance

Q4

- No – see answer to Q.3

Q5

- Flexibility needs to be incorporated within DPD to accommodate change in levels of waste i.e. effect of more recycling, more regeneration

Q6

- Yes. Dialogue with industry bodies (building / construction and highways / other councils)

Q7

- No – firm commitment to national and regional policy

Q8

- Most definitely

Q10

- Depends on the outcome of the PFI contract – however, Council may want to consider options that are linked to but not necessarily part of the eventual contract such as CHP

Q11

- Energy from waste facilities not dismissed, subject to stringent environmental protection and with guarantees that recycling will be maximised rather than made subordinate to some extent to an Energy from Waste contract

Q12

- Option 1
 - more environmentally friendly
 - least public resistance
 - existing facilities

Additional comment: environmental benefits depend to some extent on transportation issues (few sites mean more transport?) and the nature of the facility (very localised CHP plants may not be feasible, but other waste sorting centres might be)

Q13

- Yes, depending on Q.12

Q14

- Perhaps – for chemical / hazardous waste

Q15

- Option 1 – no green belt unless part of existing facility

Q16

- Yes (with some qualification, energy from waste not necessarily the first resort for waste management)

Q17

- Option 1

Q18

- Option 3

Q19

- Option 3 – need a policy for all types of waste (could be a combination of 1 and 3?)

Q20

- No – policy must be in situ – policy not left to be abused. Council needs to be proactive in this area

Q21

- Without a doubt – we need to control all waste generated

Q22

- Option 1. We must limit the easy option of falling back on landfill. Landfill is no longer a policy option that we can tolerate if alternatives can be found to deal with our waste

Q23

- Only in existing sites

Q24

- No

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