

Local Development Framework for Bradford

Core Strategy

Waste Management: Preferred Approach Policies

January 2011



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1. INTRODUCTION

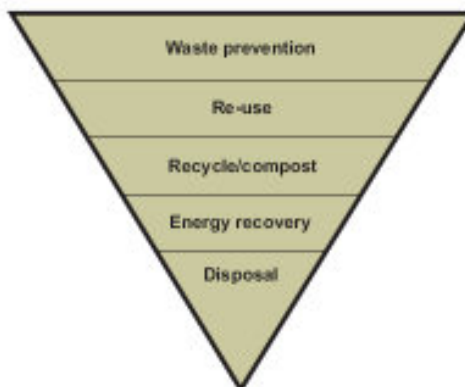
- 1.1 The Council's planning policies relating to waste management are presently incorporated within the Replacement Unitary Development Plan (2005). Following the introduction of the Planning and Compulsory Purchase Act (2004) and subsequent amendments by the Secretary of State in October 2008, Council's are required to replace their Unitary Development Plan with a Local Development Framework (LDF). The Local Development Framework will consist of several Development Plan Documents including the Core Strategy, which will set out the top level local policies ('core policies') that will guide development within the authority area.
- 1.2 The Council prepared an initial Issues and Option version of the Core Strategy for consultation in February 2007. This document included Topic Paper 8 *Waste*, focused on the strategic spatial issues and options for waste management across the District, but did not go into detail on the spatial dynamic of waste, including cross-boundary issues, that is required within the Core Strategy.
- 1.3 Following additional guidance on waste management policy being published by the Government and Planning Inspectorate, the Council produced a revised and updated Issues and Option document which was publicly consulted on in October 2008.
- 1.4 This paper sets out the preferred waste policy options which the Council propose to take forward within the Core Strategy and provides the strategic framework for the subsequent Waste Management Development Plan Document. These preferred options will be demonstrated to have been formed following consideration to consultation responses and evidence gathering. Your views are sought on the Preferred Options Policies and Approaches in order to shape policy and ensure that we make the right choices. These policies will form part of the Core Strategy but have been extracted so progress can be made on the Waste Management DPD.
- 1.5 This paper will be published for a 10 week period commencing 21st January 2011 and ending 1st April 2011. Comments should be put in writing and sent to:

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

Or alternatively by email to: ldf.consultation@bradford.gov.uk

2. POLICY CONTEXT

- 2.1 The policy direction for waste management is set out from the European, through to national, regional, and local level in various Directives, Planning Policy Statements, and spatial strategies.
- 2.2 The EC's Waste Framework Directive (2008) (Directive 2008/98/EC of the European Parliament and of the Council) states that the first objective of any waste policy should be to minimise the negative effects of the generation and management of waste on human health and the environment. It further states that waste policy should also aim at reducing the use of resources, and favour the practical application of the waste hierarchy.
- 2.3 Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) has been developed in the context of various European Directives and legislation which promote the need for increasing self-sufficiency including enabling waste to be disposed of in the nearest appropriate installation to promote environmental sustainability.
- 2.4 The importance of positive planning for the delivery of sustainable waste management is recognised and promoted within PPS10. The document sets out the Government's key overarching policies and principles which apply to waste management, applying the principles of sustainable development.
- 2.5 PPS10 reflects the Governments aspiration to remove the direct link between economic growth (and household growth) and waste generation, putting more emphasis on waste prevention and re-use. A waste hierarchy has been established which prioritises waste prevention, but emphasises the need to take all available opportunities for re-use, recycling / composting and energy recovery or those wastes which cannot be eliminated before final disposal is considered.

Figure 1 – The Waste Hierarchy

Source: DEFRA, Waste Strategy, 2007

- 2.6 Further to this strategic guidance, PPS10 requires that sites and/or areas that may be suitable for new or enhanced waste management facilities must be identified within Development Plan Documents (DPDs) to support the pattern of waste management facilities and waste apportionments set out in the now revoked Regional Spatial Strategy (RSS).
- 2.7 It sets out general principles for the allocation of sites or areas, with a focus on providing opportunities for the management of waste where it arises and the need to consider a broad range of locations including industrial sites, looking for opportunities to co-locate facilities together or with complementary activities. The Waste Management DPD sets out a full and comprehensive site suitability assessment criteria, with full qualitative and quantitative analysis within the Site Assessment and Baseline Evidence Reports.
- 2.8 The Regional Spatial Strategy for Yorkshire and Humber (RSS), adopted in May 2008, contains specific policies relating to waste management. Although now revoked as of July 2010, under guidance received from the DCLG, Local Authorities are to continue to press ahead with the development of their waste plans and to continue to use data and information prepared by partners to assist in this process. Therefore, in the absence of a more up-to-date strategic position on waste management, the RSS remains included here for context and reference. It recognises that whilst significant progress has been made in terms of Municipal Solid Waste (MSW) recycling rates, Yorkshire and Humber remains one of the worst performing regions in terms of recycling and recovery, a situation which it considers to be unacceptable.
- 2.9 In this context, RSS stresses the importance of adopting strategies across the region to avoid waste production, recover value from waste that is produced, and only dispose of the residual

proportion that has no value. The need to accelerate the rate of investment in new waste facilities and initiatives, specifically relating to MSW arisings, is particularly emphasised.

2.10 The overarching policy objectives for waste management in Bradford District are proposed as summarised below. These policy objectives have been developed in line with national guidance, and from consultation undertaken previously as part of the Issues and Options / Further Issues and Options stages of the Core Strategy and Waste Management DPD:

1. To be more self-sufficient in managing our 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;
2. 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;
3. To ensure that expanded and new waste developments support the planned growth and waste needs of the Bradford community; and
4. 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.

2.11 These objectives will be tested within the Waste Management Development Plan Document, and be used to shape the detailed policies to emerge from that document. They set the parameters for future policy and site specific allocations to be taken forward within the DPD.

3. EVIDENCE BASE

- 3.1 The evidence base presented reflects the most up to date and reliable information available at the time of writing. Further information relating to the specific details of this evidence base can be found within the Waste Management Preferred Approach Report and the supporting Baseline Evidence Report.

WASTE ARISING

CURRENT POSITION

- 3.2 The future scale of waste arisings and the waste management facilities that need to be planned and accommodated in Bradford District is critical. This section considers the need for new waste management facilities.
- 3.3 Analysis is based on the most recently available information from the Waste Data Interrogator (2008) together with other data obtained from the Environment Agency, the Council's own records and forecast waste arisings as presented within the former Regional Spatial Strategy for Yorkshire and Humber as one of the best data and evidence sources. For a full explanation of the methodology and sources used to calculate waste arisings and forecasts please refer to Appendix 3.
- 3.4 The majority of current waste arisings within Bradford District come from Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (CDEW) and Municipal Solid Waste (MSW) which combined equate to just under $\frac{3}{4}$ of the total arisings. Table 1 sets out the District's waste arisings.

Table 1: Summary Total Waste Arisings in Bradford (2008)

Type of Waste Arising	Arisings (Tonnes)	%
Agricultural Waste	137,216	7.7
Commercial and Industrial Waste	586,020	32.7
Construction Demolition and Excavation Waste	489,579	27.3
Hazardous Waste	18,991	1.1
Municipal Solid Waste - Bradford	261,097	14.6
Municipal Solid Waste - Calderdale	94,377	5.3
Waste Water	204,991	11.4
Total	1,792,271	100.0

Source: Waste Data Interrogator 2008, Environment Agency 2009, RTAB, Bradford MDC

PREFERRED WASTE ARISING FORECASTS

3.5 It is concluded that a hybrid of the two methods should be used to support planning policy relating to waste management. The hybrid approach draws on the most reliable and robust data available for each waste stream, blending local data relating to MSW and C&I waste, with regional data for other waste streams disaggregated to District level. The preferred forecast projections for each waste stream are as follows:

- **Preferred MSW Projections** - The preferred MSW projections have been taken from the Council's PFI Team's projected waste arisings, (see Table 2). This represents the most recent data on MSW arisings and is the basis on which PFI waste contracts are being procured. This data also incorporates Calderdale's MSW which is required as part of the PFI programme.
- **Preferred Commercial and Industrial Waste** - The preferred Commercial and Industrial Waste values are taken from the Regional Technical Advisory Board (RTAB) figures, as presented within Table 2. This source provides a more realistic account of future waste arisings for Commercial and Industrial Waste as it takes into consideration both Bradford's employment projections and the waste arisings from individual employment sectors unlike the RSS figures which utilises total employment figures.
- **Agricultural Waste** - The preferred value for Agricultural Waste has been taken from the disaggregated Regional RSS figures as outlined in Table 3. This source represents the most sound evidence base from the Agricultural Waste Survey. Agricultural waste arisings using this data source reflect in-situ reuse and recycling at unlicensed sites unlike the Waste Data Interrogator projections which show significant fluctuations in levels of arisings over time. While these projections remain robust and are the preferred evidence, legislation established in 2006 removed the requirement to identify Agricultural Waste facilities.
- **Construction, Demolition and Excavation Waste** - Only one robust source was identified to calculate the level of CDEW waste arisings within the District. The Waste Data Interrogator / Locally Based Forecasts and the Regional Spatial Strategy / Regional Data Based Waste Forecasts sections have therefore been used as the preferred forecast.

- **Hazardous Waste** - The preferred Hazardous Waste projections are taken from the former RSS projection of zero growth for this type of waste, as presented within Table 3. By continuing 2007 Yorkshire and Humber Waste Data Statistics Digest levels (that represent the most recent and in-depth study into this waste stream across the region) for the remainder of the plan period it allows the Council to maintain considerable capacity while aspiring to reduce or minimise growth in this waste stream in line with the former RSS.

- 3.6 By combining both forecasting methods the most reliable and locally evidenced waste forecast data is derived. These waste figures do not recognise improving technologies available to support further waste reductions over time. Therefore the base case and future projections have the potential to vary from the actual expected outcomes, but form a suitable basis upon which to plan.
- 3.7 As Table 4 illustrates the preferred forecasts calculate an overall reduction in waste arisings of 81,590 Tonnes across the district between 2008 and 2026. However not all waste streams are likely to reduce with CDEW and MSW in Calderdale likely to increase within this timeframe.

Table 2 – Preferred Forecasts for Waste Stream Projections to 2026

Waste Stream	2008	2010	2015	2021	2026
Agricultural Waste	105,067	93,305	69,318	48,564	35,641
Commercial and Industrial Waste	586,020	530,597	540,283	544,368	542,156
CDEW	489,579	492,810	503,570	520,380	531,135
Hazardous Waste	21,821	21,821	21,821	21,821	21,821
MSW - Bradford	261,097	250,404	237,324	248,410	248,410
MSW - Calderdale	94,377	92,498	92,489	97,207	97,207
Grand Total	1,557,961	1,481,436	1,464,805	1,480,749	1,476,371

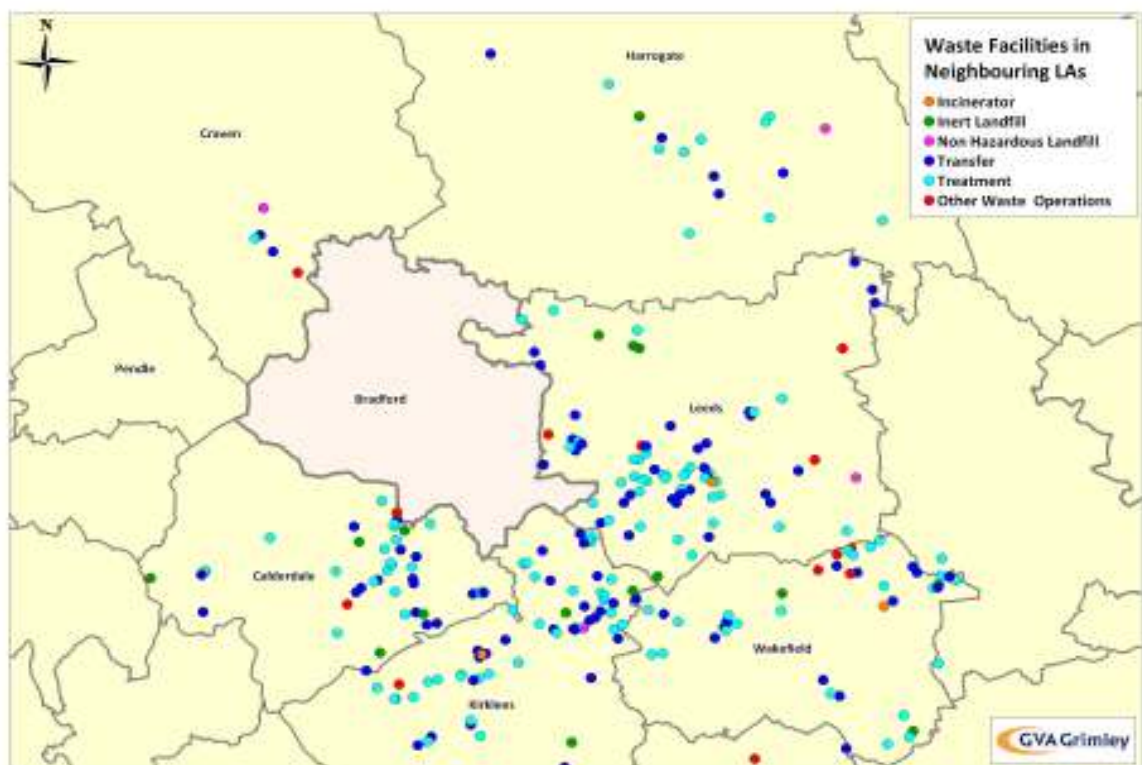
Source – Environment Agency, Former RSS for Yorkshire and Humber 2008, BMDC & GVA Grimley

- 3.8 While these levels should be planned for in terms of the provision of expanded and new facilities, the Waste Management DPD policies will also ensure that opportunities to reduce, re-use and recycle waste will be maximised and that some flexibility and contingency in the levels of future waste management facilities provision will be made on a, monitor and manage basis.
- Future monitoring of the evidence base underpinning the DPD policies will inform and adjust the levels of waste arisings to be planned for.

CROSS-BOUNDARY ISSUES

- 3.9 The Waste Management DPD must give consideration to cross-boundary issues when setting spatial policy and waste site allocations.
- 3.10 The timescales of production of the LDF Core Strategy and Waste Management DPD relative to the comparable activities across adjacent authorities and those where there are known cross-border flows of waste to and from Bradford do not allow for a comprehensive joint-area planning for waste management facilities. However, the Waste Management DPD must consider opportunities for joint working in the future as Bradford and Calderdale are already doing through a joint PFI initiative for Municipal Solid Waste management facilities.
- 3.11 It is imperative that the Waste Management DPD gives full consideration to the potential impact of sites considered for waste management uses which are in proximity to administrative boundaries. Figure 2 below sets out the locations and types of current waste management facilities in neighbouring authority areas. Further guidance relating to cross-boundary working between Local Authorities can be found within Section 2 of the Waste Management: Preferred Approach Report.

Figure 2: Waste Management Facilities in Neighbouring Local Authorities



4. POLICY

CORE POLICY

- 4.1 There is a need to consider how waste management policy within the LDF Core Strategy and the Waste Management DPD should deliver against these objectives. This includes the extent to which it is suitable to apply a waste management hierarchy within future policy.
- 4.2 Similarly, a number of policy options have been considered related specifically to the cross-boundary movement of waste from and into Bradford, and the most appropriate policy response in this context. For Bradford, and West Yorkshire and other Yorkshire and Humber sub-regions the movement of waste is a key issue. In response to this, a number of options for a potential policy approach to cross-boundary working have been identified.
- 4.3 The options developed during the Issues and Options stage have been appraised in the light of comments received through both previous rounds of consultation undertaken on the Waste Management Core Strategy Issues and Options papers, and consultation undertaken directly with adjacent authority and waste management areas. The preferred option is presented below.

WM1: Waste Management

The Council will work with its partners and neighbouring authorities to integrate strategies for waste management in Bradford and at the sub-regional and regional levels.

All forms of waste will be managed in accordance with the waste management hierarchy in the following order of priority:

- Waste prevention – avoiding the creation of waste in the first instance; then
- Re-use – making best use of existing and new facilities; then
- Recycling and composting – making best use of existing and new facilities; then
- Energy recovery – making use of technologies that recover energy from waste; then
- Disposal – including the use of landfill as a last alternative.

The Council will plan to ensure that sufficient capacity is located within the District to accommodate forecast waste arisings of all types during the plan period, reducing the reliance on other authority areas. In identifying waste management sites within the District the Council will give regard to cross-boundary issues, including waste movement and location of facilities in adjacent areas.

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- 4.4 The following paragraphs set out the appraisal of the core policy options relating to the waste management hierarchy considered through various questions set out in both of the Waste Management Core Strategy Issues and Options papers. The findings of the appraisal of each policy option considered are presented in the following paragraphs. This includes options considered relating to both the waste management hierarchy and cross-boundary policy issues.

Appraisal of Waste Management Hierarchy Policy options:

- 4.5 Option 1: Failing to set in place a waste management hierarchy would run counter to current European and national planning policy and guidance relating to waste management. Through consultation the need to take a hierarchical approach to waste management has been identified. Without a waste management hierarchy the LDF would fail to deliver against the Councils stated objectives for significant reductions in waste arisings or re-use, recycling or composting and a reduction in waste going to landfill. Such an approach would fail to support environmental and sustainability aspirations stated at the national, regional, and local levels, and would not encourage Bradford to deal with its own waste arisings within its boundary. No 'special' or local circumstances have been identified pertaining to Bradford that would make it exempt from alignment with this wider policy aspiration. Promotion of this option would not deliver any of the policy objectives identified previously within this report.
- 4.6 Option 2: Whilst setting in place an alternative hierarchy for waste management would deliver against some strategic (European, national and local) aspirations including the promotion of re-use, and recycling / composting such an approach is considered unacceptable given its continued reliance on landfill, and would not deliver energy recovery or waste prevention aspirations and policy objectives. As with Option 1 is it considered that such an approach would fail to support environmental and sustainability aspirations and policy objectives in this context. Promotion of this option would support both Policy Objective 1 and Policy Objective 2.
- 4.7 Option 3: Having not identified any special circumstances that would exempt Bradford from complying to the waste management hierarchy as established within European, national, and regional policy guidance there is no justification for deviating from this position with the policy. In this context Option 3 is the most appropriate policy to take forwards within the Core Strategy. Promotion of this option would support both Policy Objective 1 and Policy Objective 2.

Appraisal of Waste Management Cross-Boundary Policy options:

- 4.8 Option 1: The importance of promoting cross-boundary understanding of waste management issues and cross-boundary working where appropriate has been identified within consultation undertaken on the Issues & Options paper. By promoting an approach which fails to look beyond the Bradford District boundary the policy would fail to fully reflect waste management issues. This includes the failure of the core policy to address the existing reliance of Bradford on other locations for its waste management, and emerging policy, planning applications, and PFI processes in the sub-region. Promotion of this option would not deliver any of the policy objectives identified previously within this report.
- 4.9 Option 2: The importance of promoting cross-boundary understanding of waste management issues and cross-boundary working where appropriate has been identified within consultation undertaken on the Issues & Options paper. The consideration of the impact of managing waste arisings within Bradford locally is appropriate. However, by not considering the location of future facilities in relation to boundaries to adjacent authorities gives rise to the potential impact on this wider area including, for example, Areas of Outstanding Natural Beauty, or for locating two facilities in close proximity to each other divided by the District boundary. Promotion of this option would not deliver any of the policy objectives identified previously within this report.
- 4.10 Option 3: The importance of promoting cross-boundary understanding of waste management issues and cross-boundary working where appropriate has been identified within consultation undertaken on the Issues & Options paper. Option 3 is the most appropriate to be taken forwards within planning policy on the basis that it complies with strategic planning requirements, minimises impact on the wider area outside of Bradford District, and considers the strategic location of waste management facilities across the area in this wider sub-regional and beyond context. Promotion of this option would support both Policy Objective 3 and Policy Objective 4.
- 4.11 Implementation / delivery: this policy will be implemented through the allocation of sufficient and appropriate land to accommodate waste arisings of all types over the plan period. This will include the allocation of appropriate sites to move waste management within Bradford up the waste hierarchy.
- 4.12 Monitoring: waste arisings and recycling levels will be monitored annually throughout the plan period across all types of waste, waste accommodated within operational facilities, and total capacity within individual facilities and across the District.

IDENTIFYING WASTE MANAGEMENT SITES

- 4.13 European and national policy relating to forward planning for waste management requires LPA's to consider the most appropriate locations for facilities in the future. This should include the relationship of the site with the waste arisings, minimising the movement of waste, and also the consideration of the potential impact of waste management facilities on their surrounding environs.
- 4.14 The testing of various locations in this context links to both Objective 3 and 4 respectively identified through consultation on the Waste Management Core Strategy Issues and Options paper.
- 4.15 The Waste Management Core Strategy should set in place the principles of identifying appropriate locations for waste management facilities. The policy options considered link directly to the questions posed within the initial Topic Paper 8, and later second Waste Management Issues and Options paper relating both to whether a location criteria ('area of search' is required) and how to define the area of search.
- 4.16 The policy options have been appraised in the light of comments received through both previous rounds of consultation undertaken on the Waste Management Core Strategy Issues and Options papers, and consultation undertaken directly with adjacent authority and waste management areas. The preferred option is presented below.

WM2: Identifying Waste Management Sites

Sites for waste management facilities will need to be identified to deal with all forms of waste arisings within Bradford District. Sites will need to best meet environmental, economic and social needs.

In identifying and selecting sites for the management of waste, an Area of Search (Illustrated in Figures 2 and 3) is established as the framework for identifying sites for new and expanded waste management facilities. Within the Area of Search, the following order of priority will be adopted:

- The expansion and co-location of waste facilities on existing, operational sites; then
- Established and proposed employment and industrial sites where modern facilities can be appropriately developed; then
- Other previously developed land within the Area of Search, including mineral extraction and landfill sites; then
- Greenfield, previously undeveloped sites within the Area of Search; then
- Sites within the Green Belt.

In the event that no appropriate sites are identified within this area of search the Greenbelt as a restriction will be relaxed (as illustrated within the broader area of search in Figure 3).

All potential waste management sites will be subject to detailed assessment of their individual characteristics and the implications of any waste development on surrounding areas. The Waste Management DPD will establish the detailed site development criteria using a similar approach to site identification as applied within the development of strategic criteria to include consideration of:

- Policy alignment;
- Physical constraints to site development;
- Proximity to waste arisings;
- Adjacent uses;
- Potential visual intrusion; and
- Ground stability.

Figure 3 – Identified Area of Search (with Green Belt included as a constraint)

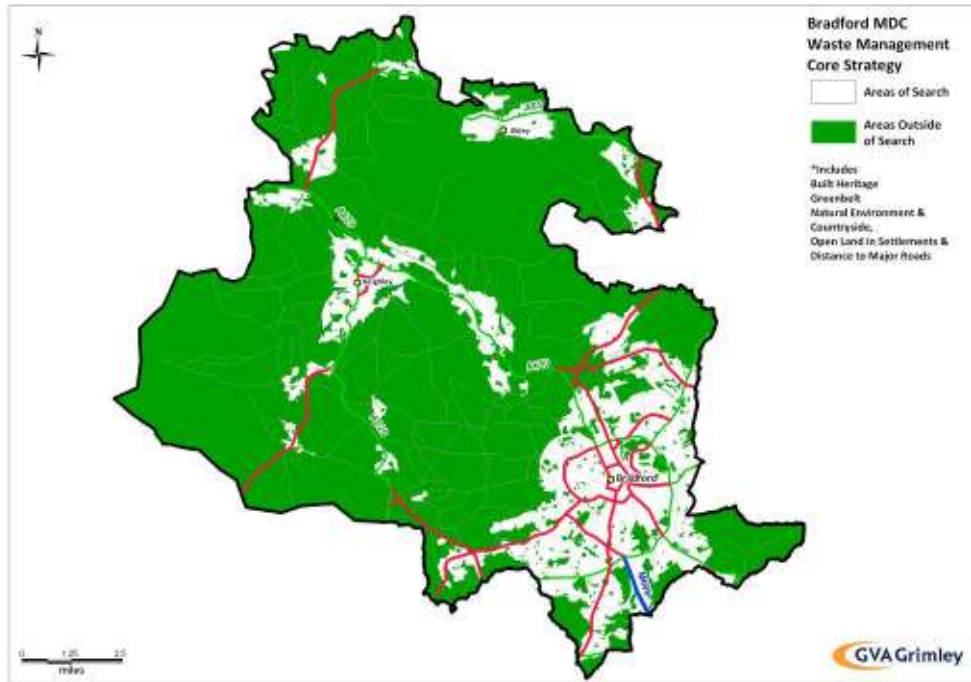
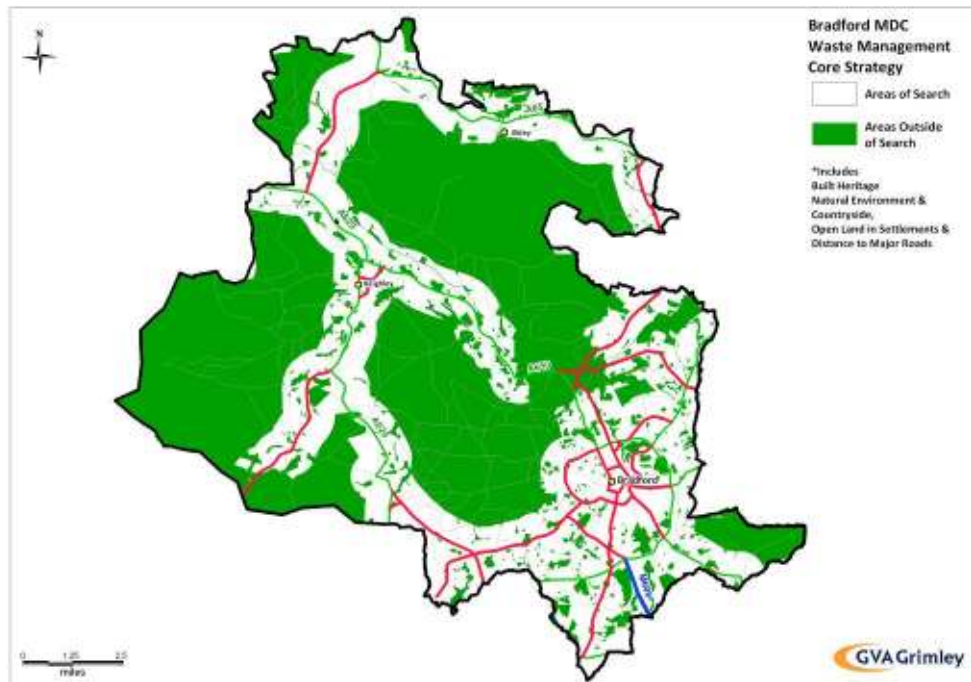


Figure 4 - Identified Area of Search (with Green Belt removed as a constraint)



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- 4.17 Figure 2 and Figure 3 illustrate the Area of Search – including the application of the Green Belt as a constraint (i.e. the Area of Search excluding areas within the Green Belt), and the removal of the Green Belt as a constraint (i.e. if insufficient sites are identified within the Area of Search excluding the Green Belt then sites within the Green Belt will be considered).
- 4.18 The Waste Management DPD Issues & Options and Preferred Approach reports have developed this scoping to consider specific sites for allocation for Municipal Solid Waste and Commercial & Industrial waste management uses, and explore further options for other types of waste. Further information on the site assessments can be found with the Site Assessment and Evidence Base Reports.

Appraisal of options:

- 4.19 The following paragraphs set out the appraisal of the core policy options relating to the identification of waste management sites considered through various questions set out in both of the Waste Management Core Strategy Issues and Options papers. The findings of the appraisal of each policy option considered are presented in the following paragraphs.
- 4.20 Option 1: From the evidence gathered, consultation responses received, and national and regional policy guidance, this option is considered to be inappropriate. Without a policy in place to direct waste management facilities spatially the Council would be reliant on the planning application process to consider potential impacts of proposals rather than a tested and accepted policy. Such an approach is considered to be reactive rather than proactive, and would not give enough certainty as to the ability of Bradford to manage its own waste arisings, including the spatial relationship of suitable locations with adjacent authority areas.
- 4.21 Option 2: Through the consultation undertaken an approach to identifying an area of search for waste management facilities is generally supported. However, it was noted the inclusion of environmentally sensitive areas could jeopardise the protection of local environmental assets. The same is true of identified historic environments across the District. It is however noted that if no other alternatives exist then it is appropriate in policy terms to allow development of waste management facilities and associated development on greenfield land and in the Green Belt.
- 4.22 Option 3: Such an approach is unacceptable as it promotes new development on greenfield land before the potential redevelopment or intensification of existing facilities where it is sustainable to do so. This would result in an unsustainable pattern of waste management across the District, and goes against policy aspirations to make the best use of previously developed land and sites including mineral workings and landfill sites.

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- 4.23 Option 4: As with Option 3 this policy approach is considered unacceptable based on consultant responses and established national and regional policy. Green Belt land should be seen as a last alternative in the event that no other, or insufficient, suitable sites or land within unconstrained locations can be identified, thereby protecting it in the first instance from being developed. By promoting Green Belt land above other types of land and sites including existing facilities, employment and industrial land, other PDL land, and greenfield sites, the policy would not result in a sustainable pattern of waste management across the District, and would not conform with national or regional policy guidance. We recognise that some waste sites are already located within the Green Belt. It is considered appropriate that such sites be considered for intensification or expansion where appropriate within the Waste Management DPD.
- 4.24 Implementation / delivery: This policy will be implemented by policies and allocations made within the Waste Management Development Plan Document which will consider and identify a list of suitable sites across the District to meet Municipal Solid Waste and Commercial & Industrial waste arisings. The Waste Management Development Plan Document will further explore other types of waste arisings.
- 4.25 Monitoring: The take up of sites identified for waste management facilities, and planning applications received and granted, alongside waste arisings and waste management methods applied, will be monitored annually throughout the plan period.

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