

Local Development Framework for Bradford

Waste Management DPD

Preferred Approach – Revised Chapter 5

Summary of Representations



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LOCAL DEVELOPMENT FRAMEWORK FOR BRADFORD

Waste Management DPD

Preferred Approach Revised Chapter 5 Consultation

(Regulation 25 & 26)

SUMMARY REPRESENTATIONS

March 2012

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APPENDIX

SCANNED COPIES OF REPRESENTATIONS AS SUBMITTED

WASTE MANAGEMENT PREFERRED APPROACH 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: Preferred Approach Revised Chapter 5 in accordance with Regulation 25 and 26. 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 Preferred Approach Revised Chapter 5 consultation and the availability of the supporting documents. Subsequently, approximately 60 CD 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.
- 1.3 Respondents in some case used 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 the Appendix of this report. A copy of the comment form can be found in Section 4.0
- 1.4 The Schedule of Representations (Section 7.0) sets out in tabular form the representations from the organisations and individuals who replied, applied to the policy section to which they commented upon.

2.0 ENVIRONMENT AND WASTE MANAGEMENT OVERVIEW AND SCRUTINY COMMITTEE & REGENERATION AND ECONOMY OVERVIEW AND SCRUTINY COMMITTEE

2.1 Prior to the meeting of the Council Executive Committee on 16th October 2011, the Waste Management DPD: Preferred Approach Revised Chapter 5 was presented to the Environment and Waste Management Committee & the Regeneration and Economy Overview and Scrutiny Committee for comment.

2.2 The Waste Management DPD: Preferred Approach Revised Chapter 5 report was presented to the Regeneration and Economy Overview and Scrutiny Committee & Environment and Waste Management Committee on 1st and 7th September 2011 respectively. The committees recommended support for the document.

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) 434296

Fax: (01274) 433767

Minicom: (01274) 392613

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

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

My Ref: TDP/P&P/LDF/WDPD/PA

Your Ref:

7th October 2011

Dear Sir / Madam,

The Local Development Framework for Bradford District Waste Management Development Plan Document (DPD): Preferred Approach Consultation (Regulation 25) – Revised Chapter 5

I write to inform you that the Council is currently carrying out an informal consultation on a revised Chapter 5 of Waste Management DPD: Preferred Approach for a period of ten weeks commencing on Monday 10th October 2011 to Monday 19th December 2011.

In January 2011, the Council published the Waste Management DPD: Preferred Approach for public consultation, for a period of 10 weeks. The Council received over 300 formal representations on the document, while the comments related to a range of matters in the consultation document, a significant number of comments were received to the proposed shortlisted sites. The Council has taken account of the comments on the site assessment methodology and proposed a number of changes. It has then re assessed all the sites again including the new sites put to the Council as part of the preferred approach consultation. This has resulted in an amended short list of sites which retains some sites a previously proposed but also some different sites. The comments received during the public consultation have been documented within the Summary of Representations.

Due to the significant change it is important that the revised sites are subject to public consultation before the Council moves to the next stage of the statutory process. This would ensure a robust engagement process is undertaken prior to the submission to examination.

The shortlist of potential waste management sites now proposed are the following:

- Site 1 – Princeroyd Way, Ingleby Road, Bradford
- Site 11- Ripley Road, Bowling
- Site 31 – Hollingwood Lane, Paradise Green
- Site 35 – Staithgate Lane, Odsal
- Site 48 – Staithgate Lane, Odsal
- Site 78 – Aire Valley Road, Worth Village, Keighley
- Site 92 – Bowling Back Lane HWS
- Site 104 – Merrydale Road, Euroway
- Site 121 – Steel Stock and Scrapholders, Birkshall Lane

At this stage in the process the Council is seeking your views on a revised Chapter 5 of the Waste Management DPD only. However, the Council will accept and consider comments received on the entirety of the Waste Management DPD: Preferred Approach report and supporting documents. The detailed site assessment report has also been updated and has been published as a background document as part of the consultation.

The following documents and other supporting documents can be downloaded from the Council's website via the Local Development Framework pages found at www.bradford.gov.uk/ldf :

- Waste Management DPD: Preferred Approach – Revised Chapter 5
- Site Assessment Report
- Summary of Representations (Preferred Approach Consultation January – April 2011)
- Engagement Plan
- Comment Form

Hard reference copies are also available in the Council's Planning Offices at: 3rd Floor Jacob's Well, Bradford, and the Town Halls at Ilkley, Keighley and Shipley. Or in the Main Libraries at: Shipley, Bingley, Keighley and Bradford Central Library. CD's are available upon request from the LDF Group.

The following 'Drop-in' events have also been organised for members of the public, community groups, the waste industry and all interests:

- Monday 31st October – St Wilfred's Church St Wilfred's Road, BD7 2LU
- Wednesday 1st November – Richard Dunn Centre, Odsal BD6 1EZ
- Monday 7th November – New Hey Road Methodist Church, New Hey Road, BD4 7HY
- Tuesday 8th November – Bradford Central Library, BD1 1NN
- Wednesday 9th November – Marley Stadium, Keighley, BD21 4DB
- Thursday 10th November – Tetley Street Church, Legrams Lane, BD7 2AA

All 'Drop-in' events take place between the hours of 4pm – 7pm. Prior booking is not required

The Council welcomes your views and comments and will consider these when producing the next stage of the document, the Submission Draft. 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

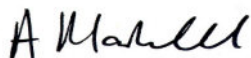
Please mark comments as 'Waste Management DPD: Preferred Approach – Revised Chapter 5'.

Comments should be received by Monday 19th December 2011

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

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A Marshall'.

Andrew Marshall (Strategy Manager)

4.0 COMMENT FORM

Waste Management DPD: Preferred Approach

Bradford Council is seeking your views on the Preferred Approach to planning of Waste Management within the District for the next 15 – 20 years, as set out within the **Waste Management DPD: Preferred Approach – Revised Chapter 5**. This document is available on the Council's website and at Bradford Central, Keighley, Shipley, Bingley Libraries; and Keighley, Shipley and Ilkley Town Halls.

Name _____

Address _____

Preferred Policy W5: Location of Waste Management Facilities and Sites

1. Do you agree with the preferred locational strategy for potential future waste management facilities and sites within the Bradford District?

Yes No

Comment:

Preferred Policy W6: Assessing MSW (Municipal Solid Waste) and C&I (Commercial and Industrial) Waste Sites

2. Do you agree with the preferred approach to assessing site potential future waste management sites for the treatment MSW and C&I waste?

Yes No

Comment:

Shortlist of Potential Waste Management Sites

Site 1 – Prince Road Way, Ingleby Road, Listerhills (2.1 ha)

Comments:

Site 11 – Ripley Road, Bowling (2.35 ha)

Site 31 – Hollingwood Lane, Paradise Green (2.3 ha)



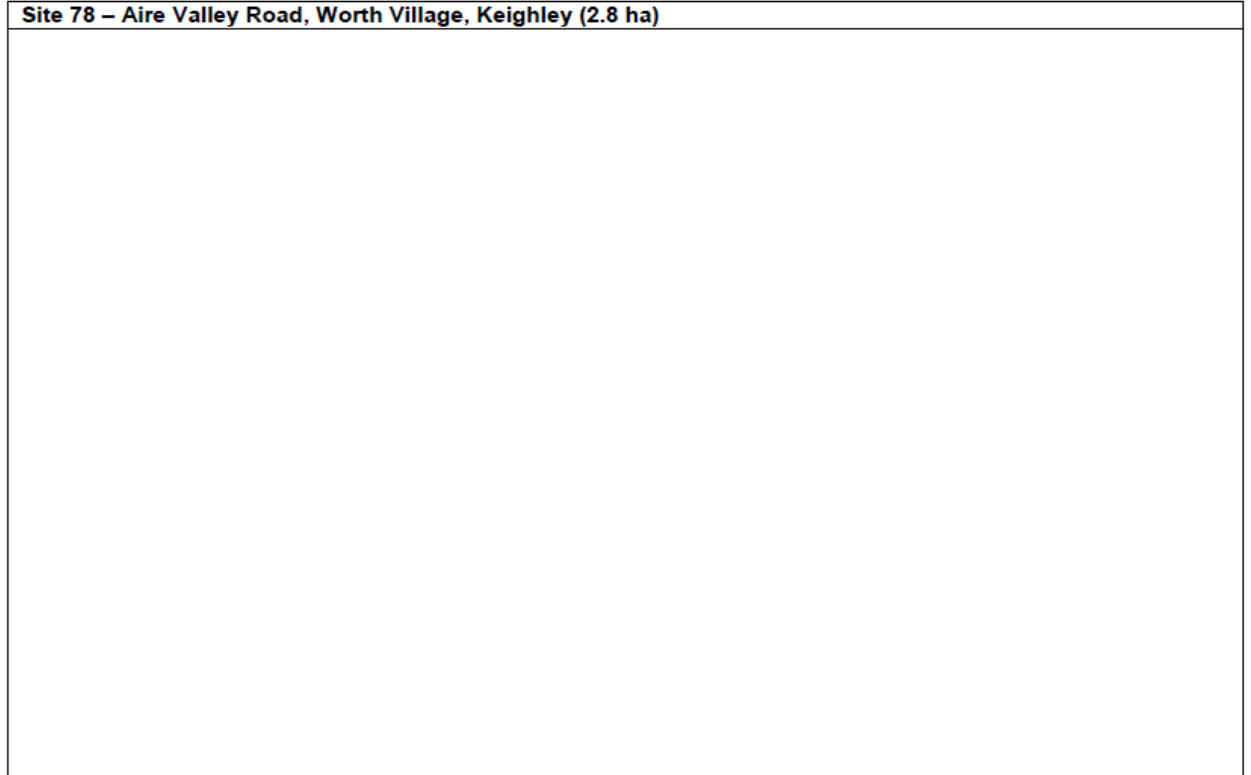
Site 35 – Staithgate Lane (North), Odsal (6.6 ha)



Site 48 – Staithgate Lane (South), Odsal (2.87)



Site 78 – Aire Valley Road, Worth Village, Keighley (2.8 ha)



| |
|--|
| Site 92 – Bowling Back Lane HWS, Bowling Back Lane (4.2 ha) |
| |

| |
|--|
| Site 104 – Merrydale Road, Euroway (2.0 ha) |
| |

Site 121 – Steel Stock and Scrapholders Site, Birkshall Lane (4.1 ha)

Additional Site

3. Are there any sites that you feel should be put forward that have not been considered or assessed during the site assessment process?

Yes

No

Comment:

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

Please complete the form, save and email back to the LDF Group at the email address below. Alternatively, print the form and complete by hand, posting back to the address below. Please return all comment forms by Friday 23rd December 2011

Bradford Local Development Framework Group

FREEPOST NEA11445

PO BOX 1068

BRADFORD,

BD1 1BR

email: ldf.consultation@bradford.gov.uk

Fax 01274 433767

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

Hand Deliver to the any of the districts planning offices in the City Centre (3rd Floor Jacobs Well), Keighley (Town Hall) and Ilkley (Town Hall).

The following 'Drop-in' events have also been organised for members of the public and community groups:

Monday 31st October – St Wilfred's Church St Wilfred's Road, BD7 2LU

Tuesday 8th November – Pop-Up Shop, Centenary Square, Bradford, BD1 1SD

Wednesday 1st November – Richard Dunn Centre, Odsal BD6 1EZ

Monday 7th November – New Hey Road Methodist Church, New Hey Road, BD4 7HY

Wednesday 9th November – Marley Stadium, Keighley, BD21 4DB

Thursday 10th November – Tetley Street Church, Legrams Lane, BD7 2AA

All 'Drop-in' events take place between the hours of 4pm – 7pm. Prior booking is not required

5.0 SCHEDULE OF DROP-IN EVENTS

- 7.1 As part of the public consultation for the Waste Management DPD: Preferred Approach Revised Chapter 5, a number of 'Drop-in Events' were held in areas that would be directly affected by the proposed short listed of potential waste management facility sites. These drop-in events were held as follows:

| DROP IN EVENT DETAILS | |
|------------------------------|--|
| GREAT HORTON | St Wilfrid's Church – 31 st October 2011 4pm – 7pm |
| ODSAL | Richard Dunn Centre – 1 st November 2011 4pm – 7pm |
| BOWLING | New Hey Road Methodist Church – 7 th November 2011, 4pm – 7pm |
| CITY CENTRE | Pop Up Shop, Centenary Square - 8 th November 2011, 4pm – 7pm |
| KEIGHLEY | Marley Stadium – 9 th November 2011, 4pm – 7pm |
| LIDGET GREEN | Tetley Street Church, Legrams Lane – 10 th November 2011, 4pm – 7pm |

6.0 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

| Rep No. | Customer Ref No. | Consultee | Group/Organisation | Agent |
|---------|------------------|----------------------------|--|--------------|
| 1. | | Steve Staines | Friends, Families and Traveller and Traveller Law Reform Project | |
| 2. | | Nicholas Hewlett | | |
| 3. | | Ian Smith | English Heritage | |
| 4. | | John Hollister (on Behalf) | Earth-Tech Skanska | Scott Wilson |
| 5. | | Cheryl Brown | Steeton-Parish Council | |
| 6. | | Cllr John Godward | Great Horton Ward Councillor | |
| 7. | | Mohammed Bashir | | |
| 8. | | Zulakha Bi | | |
| 9. | | Ajaib Hussain | | |
| 10. | | Graham Fisher | | |
| 11. | | Mr & Mrs Mistry | | |
| 12. | | Mr N Mistry | | |
| 13. | | Mr G Mistry | | |
| 14. | | Mrs & Mrs L Matthews | | |
| 15. | | S Mortimer | | |
| 16. | | C Smithson | | |
| 17. | | Michelle Swallar | | |
| 18. | | Lesley Matthews | | |
| 19. | | Tony Dylak | Royds Community Association | |
| 20. | | Dennis Flaherty | | |
| 21. | | Mr TA Otty | | |
| 22. | | Ms G Hancock | | |
| 23. | | Mr S Jackson | | |
| 24. | | Ms E White | | |

| | | | | |
|-----|--|------------------------------|---|----------------------------------|
| 25. | | Audrey Hunt | | |
| 26. | | Sandra Warburton | | |
| 27. | | Rev. Susan & David Griffiths | | |
| 28. | | Councillor Joanne Dodds | Great Horton Ward Councillor | |
| 29. | | James Podesta (on Behalf) | Chesapeake Ltd (Land Owner of Site 31) | CB Richard Ellis |
| 30. | | Toni Rios | Highways Agency | |
| 31. | | Alistair Flatman (on Behalf) | Ogden Properties Ltd | ID Planning |
| 32. | | Steve Gibbs (on Behalf) | P Casey (Enviro) Ltd | The Arley Consulting Company Ltd |
| 33. | | James Cheeseman | BMW (UK) Trustees Ltd | |
| 34. | | Beverley Lambert | Environment Agency | |
| 35. | | MJ Rowat | | |
| 36. | | Mohammed Saleem | | |
| 37. | | Ian Sanderson | West Yorkshire Archaeology Advisory Service | |
| 38. | | Alex Roberts | Wakefield Council | |
| 39. | | Rev. James Callaghan | | |
| 40. | | Mr Athony Walsh | | |
| 41. | | John Samuel | | |
| 42. | | Mr & Mrs Piras | | |
| 43. | | G.B. Whilde | | |
| 44. | | Mrs W Whilde | | |
| 45. | | Mr & Mrs R Poole | | |
| 46. | | MJ Dickenson | | |
| 47. | | Brenda Bolland | | |
| 48. | | Mr Andrew Haigh | | |
| 49. | | Mrs Maria Haigh | | |

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|-----|--|----------------------------------|--|--|
| 50. | | Jo, Victoria, Clare & Tim Mulley | | |
| 51. | | Joseph & Norah Nunn | | |
| 52. | | Gwen Seery | | |
| 53. | | Madeleine Davison | | |
| 54. | | Mrs J Lawrenson | | |
| 55. | | Miss K Lawrenson | | |
| 56. | | Mrs C. Fawbert | | |
| 57. | | Miss S. Fawbert | | |
| 58. | | Tad & Margaret Jandzio | | |
| 59. | | Tom and Mai Pickles | | |
| 60. | | Anita & Benjamin Jowett | | |
| 61. | | Mrs D Hird | | |
| 62. | | M Hodgson | | |
| 63. | | M.P. Northrop | | |
| 64. | | Katia & Adam Digby | | |
| 65. | | Mr Vishal Kajar | | |
| 66. | | Mrs Snehal Kajar | | |
| 67. | | H. Bradley | | |
| 68. | | Peter Shackleton | | |
| 69. | | Tracey Vento | | |
| 70. | | Geoffrey & Anita Barber | | |
| 71. | | Nick & Anne Spaelir | | |
| 72. | | Mrs S.M. Monaghan | | |
| 73. | | Philip Steel | | |
| 74. | | Allison Chippendale | | |
| 75. | | Helen Wray | | |
| 76. | | Danny Kitcheman | | |
| 77. | | Andrea Lyle | | |
| 78. | | Mrs R. Mistry | | |

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|------|--|------------------------|--|--|
| 79. | | Mr & Mrs J&P Hall | | |
| 80. | | Miss Mary C. Monaghan | | |
| 81. | | Lorie Amba | | |
| 82. | | Teresa Barusevicus | | |
| 83. | | Doreen & Alf Crabtree | | |
| 84. | | Paul Baldwin | | |
| 85. | | Kath Callumbien | | |
| 86. | | David & Susan Robinson | | |
| 87. | | Teresa Warszylewicz | | |
| 88. | | Helen & Harry Matthews | | |
| 89. | | Sharon Jeffrey | | |
| 90. | | Alison Kimber | | |
| 91. | | Elaine Davis | | |
| 92. | | A. Deans | | |
| 93. | | Margaret Swinbank | | |
| 94. | | Zoe & Simon Ridewood | | |
| 95. | | Mr & Mrs Grayson | | |
| 96. | | Kathleen Patefield | | |
| 97. | | Delisa Pickles | | |
| 98. | | Julie McDonald | | |
| 99. | | T. Richards | | |
| 100. | | Susan McConnell | | |
| 101. | | Nadia Ali | | |
| 102. | | Mr & Mrs Hart | | |
| 103. | | Irene Fagen | | |
| 104. | | Susan Goodwin | | |
| 105. | | Victoria Foster | | |
| 106. | | Babu lakose | | |
| 107. | | Tracey Bottomley | | |
| 108. | | Clare Gardner | | |

| | | | | |
|------|--|--------------------------------------|--|--|
| 109. | | Antonio & Razil Frani | | |
| 110. | | Mrs Pat Parke | | |
| 111. | | Lisa Dowling | | |
| 112. | | Nancy Latouche | | |
| 113. | | Christine Hannah | | |
| 114. | | Bridget & Noel Howley | | |
| 115. | | Susan Bannon | | |
| 116. | | Gerry Pearson | | |
| 117. | | Mrs Sheila Kelly | | |
| 118. | | William John Lever | | |
| 119. | | Margaret Dylak | | |
| 120. | | Terence A. Louram | | |
| 121. | | D. Louram | | |
| 122. | | Anne, David, Joanne & William Lauram | | |
| 123. | | Helen & Gary Rolue | | |
| 124. | | Mr & Mrs Verity | | |
| 125. | | Stephen, Kathleen & Thomas Dalton | | |
| 126. | | Agnes Hawley | | |
| 127. | | Mrs. Elizabeth Mary Buffham | | |
| 128. | | David Jason Kennedy | | |
| 129. | | Nora Kilcoyne | | |
| 130. | | Patricia Bentley | | |
| 131. | | Sharon Nelder | | |
| 132. | | Robin Reid | | |
| 133. | | Miss Iryna Bojczuk | | |
| 134. | | Ashiq Hussain | | |
| 135. | | M. Magkeen | | |

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|------|--|---------------------|--|--|
| 136. | | Huss Nain | | |
| 137. | | Wakkas Ashraf | | |
| 138. | | M. Afrazal | | |
| 139. | | M. Mushtaq | | |
| 140. | | Rajab | | |
| 141. | | Q. Hussain | | |
| 142. | | M. Rafique | | |
| 143. | | M. Hanif | | |
| 144. | | Adeel Ashraf | | |
| 145. | | M. Suleman | | |
| 146. | | Mr Mohd Saddiq | | |
| 147. | | Mohammed Najib | | |
| 148. | | Khadir Hussain | | |
| 149. | | M. Azam | | |
| 150. | | M.N. Patel | | |
| 151. | | Kasim Gulfam | | |
| 152. | | Subtain Mahmood | | |
| 153. | | Kamran Hussain | | |
| 154. | | Amar Rafiq | | |
| 155. | | Nasar Mahmood | | |
| 156. | | Gulzreen | | |
| 157. | | Abdul Sahmad Mughal | | |
| 158. | | Mohammed Yaquub | | |
| 159. | | Asam Ifrahim | | |
| 160. | | Mr Suhail Baig | | |
| 161. | | Zia Hussain | | |
| 162. | | Mazhar Zabal | | |
| 163. | | Nafis Akhtar | | |
| 164. | | Mohammed Rahim | | |
| 165. | | Shakir Abzal | | |

| | | | | |
|------|--|----------------------|-----------------|--|
| 166. | | M. Bilal | | |
| 167. | | P. Patel | | |
| 168. | | Raja Fazal Rehman | | |
| 169. | | Shahid Sadiq | | |
| 170. | | A. Rehman | | |
| 171. | | A. Mahood | | |
| 172. | | Liaqat Khan | | |
| 173. | | Negat Akhtar | | |
| 174. | | Ali Asghar | | |
| 175. | | Mohammed Hameed | | |
| 176. | | Mohammed Yasin | | |
| 177. | | Mohammed Ayaas Yasin | | |
| 178. | | Mohammed Awees | | |
| 179. | | Mohammed Azeem | | |
| 180. | | H. Fishwick | | |
| 181. | | Mrs Nadia Begum | | |
| 182. | | Mohd Aftikhar Khan | | |
| 183. | | Mr Sardar Ali | | |
| 184. | | Mohammed Munir | | |
| 185. | | Mohammed Shakeel | | |
| 186. | | Asif Shafiq | | |
| 187. | | T. Hussain | | |
| 188. | | Chris H Smith | Natural England | |
| 189. | | GJ Llewellyn | | |
| 190. | | Helen Ledger | Sport England | |
| 191. | | Fazal Karim | Resident | |
| 192. | | Iftikar Ali | Resident | |
| 193. | | Z Karim | Resident | |
| 194. | | Mohammed Al Khan | Resident | |
| 195. | | Mr & Mrs Mihammed | Resident | |

| | | | | |
|------|--|---------------------|----------|--|
| 196. | | Yasmin Aktar | Resident | |
| 197. | | Mohammed Rafique | Resident | |
| 198. | | Sham Mohammed Akbar | Resident | |
| 199. | | Mohammed Rahim | Resident | |
| 200. | | | | |

7.0 SCHEDULE OF REPRESENTATIONS

| GENERAL COMMENTS | | |
|------------------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Tony Dylak Royds Community Association | Ideally you will consider sites which are not mixed industrial and residential. They need to be away from where people live, learn or enjoy their leisure and community lives. |
| | Revs. Susan and David Griffiths Residents | We would just ask you to ensure that the proposed waste site is not near any housing; and if possible we suggest that the site should be on / near existing industrial units and brownfield land. |
| | Chris H Smith Natural England | <p>Natural England broadly supports the general aim of the Waste Management DPD in promoting more sustainable methods of waste management, up the 'waste hierarchy', in accordance with European and National Policy. Natural England welcomes recognition in Chapter 7 that there is an over-reliance on road based transport to carry waste. As well as potentially becoming a "major source of local disturbance", road based transport modes generate carbon emissions, contributing to climate change. The DPD's provision that "a key consideration must be to reduce the reliance on road transport where practical" is thus welcomed.</p> <p>Natural England supports the provision at Paragraph 7.19 on Page 84 that to maximise the potential environmental and public benefit from waste landfill site restoration, proposals must provide for an enhancement to wildlife habitats as well as other sites of scientific and geological interest.</p> <p>With regard to Chapter 8, Natural England broadly supports Bradford's Waste Objectives as set out on Pages 87 and 88.</p> |

| GENERAL COMMENTS | | |
|------------------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | <p>Arley Consulting Company Limited (TACCL)</p> <p>on behalf of P Casey (Enviro) Ltd (PCE)</p> | <p>TACCL has previously commented on behalf of PCE on the Issues and Options and the previous Preferred Approach Consultations.</p> <p>In our responses, we commented on the terminology used in relation to some of the options. Our comments do not appear to have been addressed in the revised Chapter 5, and we consider that this continued failing makes it impossible to understand the intent and means of application of the proposed policies.</p> <p>Our assumption is that landfill is intended to be covered by the policies proposed for landfills or for waste disposal sites, and not by those for waste management facilities/sites. In other words, landfills are covered by Preferred Policies W4 and W10, and not by W5-9.</p> <p>If we are correct, the revision of Chapter 5 does not affect our proposals, and we have no further comments.</p> <p>Lest we are wrong, we repeat here our previous comments on Policies W5 and W6:</p> <p>W5. <i>We assume is not intended to apply to landfill. Landfills could accept a range of wastes, both those for which sites are to be identified and those for which a criteria based policy approach is proposed. Should the policy be intended to apply to landfill – for example to CDEW (which it could logically be considered to deal with) - it is unclear how it could work.</i></p> <p>W6. <i>Similarly, in relating to “facilities” (para 5.3 et seq) and relating only to MSW and C&I waste sites, we assume that Policy W6 does not apply to landfill.</i></p> <p><i>Policy W6 does not appear to be a Policy, but an account of the methodology of an assessment exercise. The policy appears to be either that all sites should be assessed against all the criteria, or that the shortlisted sites are identified.</i></p> <p>The remainder of our comments in our letter of 31 March 2011 remain valid.</p> |

| GENERAL COMMENTS | | |
|------------------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>We welcome the removal from consideration of those sites we previously identified as lying within flood zones 2 and/or 3. This is a positive application of the sequential test advocated by PPS25</p> <p><u>Surface Water Run-off</u></p> <p>Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.</p> <p>The variety of SuDS techniques available means that virtually any development should be able to include a scheme based around these principles.</p> <p><u>Amenity Impact</u></p> <p>A well run and well designed waste facility is suitable for most industrial areas. However, our experience of some waste handling and treatment facilities, particularly those dealing with biodegradable waste, tells us that factors which effect amenity are key and can have an effect on nearby residents. More emphasis should therefore be given to the potential for noise, odour and flies to have an impact on sensitive receptors. Environmental permits do contain rigorous conditions to control all emissions but because impacts which effect amenity are variable and subjective it would be unwise to assume that permit compliance would equate to a scenario of no effect on anyone. This may be a particular issue at Site 1 Princeroyd Way, which is located in very close proximity to residential properties.</p> |

| GENERAL COMMENTS | | |
|------------------|---|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | | <p><u>Groundwater and Contaminated Land</u></p> <p>A number of groundwater abstractions are present in the vicinity of some of the proposed sites. The potential risks to these abstractions should be taken into account when deciding upon the activities to be undertaken on these sites. There should be no degradation to the quality or quantity of water obtained from these abstractions as a result of the planned developments.</p> <p>This comment applies mainly to Site 121 although is applicable to all sites. A search for de-regulated and private supplies should be conducted for all sites contained within the LDF to ensure the security of any such abstractions.</p> <p>Although we recognise that none of the sites proposed are landfill sites, I would refer you to my previous letter and the comments made in relation to landfill location which should be taken into account within the appropriate chapters of the Waste Management DPD.</p> |
| | Ian Sanderson West Yorkshire Archaeological Advisory Service | <p>We have checked the shortlist of potential waste sites against the WY Historic Environment Record held by WYAAS & would make the following comment:</p> <p>The uses of Sites 1, 11, 35, 48, 78, 92, 104 or 121 would have no apparent significant archaeological implications.</p> |
| | Alex Roberts Wakefield MDC | <p>Wakefield welcomes Bradford's commitment to reduce the amount of waste directed to landfill sites and the amount of waste exported to facilities in Wakefield. Recognition should be given to Wakefield's adopted Local Development Framework Waste Development Plan Document in particular the approach to the landfill site at Welbeck, Normanton – paragraph 3.11 which is safeguarded for landfill use during the plan period to 2026.</p> |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Ian Smith English Heritage | Sound - National policy guidance in PPS5 identifies Registered Battlefields and World Heritage Sites as falling within the group of heritage assets "of the highest significance" where loss or substantial harm should be "wholly exceptional". We welcome the amendments to this aspect of the Policy to include reference to these designations. |
| | John Hollister URS Scott Wilson on Behalf of Earth- Tech Skanska | Whilst in general agreement with the preferred locational strategy, we wish to see proximity to other waste management facilities deleted from the potential site selection criteria - since this is i) unnecessary if all such facilities are to be within the broad areas of search identified in the WCS, ii) unduly prescriptive and iii) is based on the false premise that most of the facilities will transport materials from one to another. |
| | Mohammed Bashir Resident | Disagreed with Preferred Approach |
| | Zulakha Bi Resident | Disagreed with Preferred Approach Too close to a residential area and school very close by. |
| | Ajaib Hussain Resident | Agreed and Disagreed with Preferred Approach. Yes and no. Any site away from residential properties i.e. M606 I would give a positive to this (yes). Any site's which are next to or bang in the middle of residential areas I would disagree with. |
| | Graham Fisher Resident | Agreed with Preferred Approach |
| | S Mortimer Resident | Disagreed with Preferred Approach More heavy traffic in an area of high usage. Adjacent bungalows already suffer noise pollution and excessive interior vibration in bedrooms. Also concern about just what is going into the air. Traffic going onto the M606 roundabout is going to be a real problem in the near future. |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | C Smithson Resident | Enough is enough. You can not get a gallon into a pint pot. As it is the amount of heavy vehicles now coming up and down Staithgate Lane is far too much and by putting a waste management facility down there is will be impossible ti get onto the roundabout at the M606 roundabout. As it is now, there are more heavy vehicles using that minor road 34 hours a day than it was built to cope with to say nothing of the vibration which can be felt in nearby houses. If this site is approved then a slip road should be built onto the M606 northbound at Euroway and Staithgate Lane should have weight limit of no more than 7.5 tonnes. |
| | Lesley Matthews Resident | Disagreed with Preferred Approach We are already disturbed by the industrial units behind our property. You should not be considering removing the recreational facilities to provide waste management. |
| | Tony Dylak Royds Community Association | Agreed with Preferred Approach Waste has to be managed and it is helpful to launch a consultation on your preferred sites. However, comments made must be listened to, and not dismissed as NIMBY responses. Some types of waste disposal are intrusive to the local environment, and are not best placed in a residential area. Some of your preferred sites are categorised as industrial, which can make them look suitable. However, an area with housing cannot be determined as industrial. They should at least be re categorised as 'mixed use', being partly industrial and partly residential. The narrow assessment criteria explained at the consultation event would then look somewhat different for some sites. |
| | Denis Flaherty Resident | Disagreed with Preferred Approach |
| | Mr T.A. Otty Resident | Disagreed with Preferred Approach We have nicely got over the Odsal tip closing. We had rubbish blowing about, nasty fish smells etc. Then smells from Marks Chemicals and Low Moor Chemicals. Not to mention Astonish and Expect wagons running up Staithgate. No vacancies at M&S for local people. |
| | Ms E White | Disagreed with Preferred Approach It will be directly behind my house. |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Audrey Hunt Resident | Disagreed with Preferred Approach Not in residential areas. We went past the bowling site it looks terrible. We definitely do not want any down Staithgate lane at all. |
| | Sandra Warburton Resident | The criteria does not take into consideration any highways issues regarding access and egress from these sites. An officer at the consultation at Richard Dunns said this could be all sorted out at the planning stage. This is clearly too late. Most of these sites have been pin pointed on a map without any thought of the communities or their geographical location. |
| | James Podesta CBRE – on behalf of Chesapeake Ltd | Disagreed with Preferred Approach |
| | Toni Rios Highways Agency | Any site assessment and selection process should include an appraisal of the sites transport impact which should include an assessment of the Strategic Road Network. |
| | ID Planning on behalf of Ogden Properties | Agree with Preferred Approach |
| | James Cheeseman Jones Lang LaSalle on behalf of BMW UK Trustees Ltd | Agree with Preferred Approach |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | M. J. Rowat Resident | Disagree with Preferred Approach The revised Chapter 5 of the Preferred solution shows all proposed waste management sites concentrated in a rather small area of the metropolitan district. I strongly object to such a concentration of the facilities for the processing of waste much of which is comprised of objectionable material. Such plants should be located far away from residential areas and as far apart as possible. The locational strategy is plain wrong. |
| | Mohammed Saleem Resident | Disagree with Preferred Approach I do not agree with waste management sites in the inner city areas which are highly populated. |
| | Rev James Callaghan Resident | Disagree with Preferred Approach Clearly, waste disposal needs a management strategy and it is only right that public consultation on the matter should take place. The consultation seems not to have been widely advertised, nor advertised in minority languages. Some of the criteria used to classify potential sites is, at best, extremely limiting and in some instances clearly wrong. For example, to describe the site at Princeroyd Way off Ingelby Road as "Industrial" takes no account of the fact that there is a substantial residential area to the south of the site, including two sheltered/warden assisted schemes for elderly residents. In short, not sufficient account seems to have been taken where people actually live. |
| | Ashiq Hussain Resident | Disagreed with Preferred Approach |
| | Adeel Ashraf Resident | Disagreed with Preferred Approach |
| | M Maskeen Resident | Disagreed with Preferred Approach |
| | Huss Nain Resident | Disagreed with Preferred Approach |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Wakkas Ashraf Resident | Disagreed with Preferred Approach |
| | M. Afzal Resident | Disagreed with Preferred Approach |
| | Rajab Resident | Disagreed with Preferred Approach |
| | M. Mushtaq Resident | Disagreed with Preferred Approach |
| | Q. Hussain Resident | Disagreed with Preferred Approach |
| | M. Rafique Resident | Disagreed with Preferred Approach |
| | M. Hanif Resident | Disagreed with Preferred Approach |
| | Mr Saddif Resident | Disagreed with Preferred Approach |
| | Mohammed Najib Resident | Disagreed with Preferred Approach |
| | M. Suleman Resident | Disagreed with Preferred Approach |
| | T. Hussain Resident | Disagreed with Preferred Approach |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Khadir Hussain Resident | Disagreed with Preferred Approach |
| | M Azam Resident | Disagreed with Preferred Approach |
| | M.N. Patel Resident | Disagreed with Preferred Approach As it's residential and family & kids area. |
| | Kasim Gulfam Resident | Disagreed with Preferred Approach |
| | Asif Shafiq Resident | Disagreed with Preferred Approach |
| | Subtain Mahmood Resident | Disagreed with Preferred Approach |
| | Kamran Hussain Resident | Disagreed with Preferred Approach |
| | Amar Rafiq Resident | Disagreed with Preferred Approach |
| | Nasar Mahmood Resident | Disagreed with Preferred Approach |
| | Gulzreen Resident | Disagreed with Preferred Approach Foul smell / vermin. Not ideal for area we live in. |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Abdul Sahmad Mughal Resident | Disagreed with Preferred Approach Location is unsuitable because, the area we live in is a residential area. This will only attract vermin / foul smells / unnecessary heavy traffic such as heavy goods vehicles. Leeds Road is an example of this where the foul smell is intolerable. |
| | Mohammed Yaquub Resident | Disagreed with Preferred Approach |
| | Asam Ifrahim Resident | Disagreed with Preferred Approach |
| | Mr Suhail Baig Resident | Disagreed with Preferred Approach |
| | Zia Hussain Resident | Disagreed with Preferred Approach |
| | Mazhan Zabal Resident | Disagreed with Preferred Approach |
| | Nafis Akhtar Resident | Disagreed with Preferred Approach |
| | Mohammed Rahim Resident | Disagreed with Preferred Approach |
| | Shakir Abzal Resident | Disagreed with Preferred Approach The house are too close to this waste facility. We don't pay our taxes to have waste facilities 2 minutes away from our house. And also the noise, pollution, etc would impact on the many elders of this community. And also its near a primary school. |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | M. Bilal Resident | Disagreed with Preferred Approach |
| | P. Patel Resident | Disagreed with Preferred Approach |
| | Raja Fazal Rehman Resident | Disagreed with Preferred Approach |
| | Shahid Saqiq Resident | Disagreed with Preferred Approach |
| | A. Rehman Resident | Disagreed with Preferred Approach |
| | A. Mahmood Resident | Disagreed with Preferred Approach |
| | Liaqat Khan Resident | Disagreed with Preferred Approach |
| | Negat Akhtar Resident | Disagreed with Preferred Approach Sorry to say I don't agree, Princeville is already a bad area for rubbish, we are already raided with mice / rats in the area. People will be dumping all sorts. |
| | Ali Asghar Resident | Disagreed with Preferred Approach |
| | Mohammed Hameed Resident | Disagreed with Preferred Approach |
| | Mohammed Yasin Resident | Disagreed with Preferred Approach No, I don't agree with the locational strategy. |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mohammed Ayaas Yasin Resident | Disagreed with Preferred Approach. I strongly disagree with the new waste sites being developed. |
| | Mohammed Awees Resident | Disagreed with Preferred Approach I wish to object to proposal of the waste site on princes road way, Ingleby Road. |
| | Mohammed Azeem Resident | Disagreed with Preferred Approach |
| | H. Fishwick Resident | Disagreed with Preferred Approach |
| | Mrs Nadia Begum Resident | Disagreed with Preferred Approach Because I wouldn't prefer more rubbish around which would occur smell and unhealthy for everyone. |
| | Mohd Aftikhar Khan Resident | Disagreed with Preferred Approach |
| | Mr Sardar Ali Resident | Disagreed with Preferred Approach |
| | Mohammed Munir Resident | Disagreed with Preferred Approach |
| | Mohammed Shakeel Resident | Disagreed with Preferred Approach |
| | Steve Gibbs The Arley Consulting Company Ltd on behalf of P Caey (Enviro) Ltd (PCE) | We assume is not intended to apply to landfill. Landfills could accept a range of wastes, both those for which sites are to be identified and those for which a criteria based policy approach is proposed. Should the policy be intended to apply to landfill – for example to CDEW (which it could logically be considered to deal with) – it is unclear how it could work. |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Chris H Smith Natural England | <p>Based on the findings of the Sustainability Appraisal, Natural England broadly supports combining Options 1 and 2 as they perform equally well. Notwithstanding this, Natural England notes that a hybrid approach has not been tested through the Sustainability Appraisal process. Evidence on the sustainability performance of this option would be welcomed. Further, Natural England welcomes the provision in Preferred Policy W5: Location of Waste Management Facilities and Sites that the criteria based policy approach to site allocation will take account of Bradford's future waste needs, site suitability, sustainability and delivery criteria, as well as the Districts spatial vision and strategic planning objectives contained in the Core Strategy.</p> <p>Site Identification List</p> <p>In the Consultation Findings on Page 10, the Council states that Option 2 will be taken forward in compiling the Site Identification list. Natural England's opinion is that priority be given to previously developed sites as they may result in fewer adverse effects on the landscape and wildlife habitats, although the potential for protected species to be present must be assessed.</p> |
| | GJ Llewellyn Resident | <p>Agreed with Preferred Approach</p> <p>It seems sensible to have a mixed strategy as processing technologies (both current and future) may operate more efficiently and in a more environmentally friendly way of operated with the correct through put – whether high or low (20 years could see significant changes in processing technologies).</p> |
| | Fazal Karim Resident | <p>Disagreed with Preferred Approach</p> <p>Too close to residential property. Children's school; and play area near by. The area requires more housing and jobs. This is not efficient usage of land with residential area.</p> |
| | Iftikar Ali Resident | <p>Disagreed with Preferred Approach</p> <p>My children play in the nearby area. Residential Area.</p> |

| W5 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Z Karim Resident | Disagreed with Preferred Approach This area should be better used to create jobs and employment, not for waste management. This area is not well developed and requires investment for jobs and housing. |
| | Mohammed Al Khan Resident | Disagreed with Preferred Approach |
| | Mr & Mrs Mohammed Resident | Disagreed with Preferred Approach Not happy at all. All of our neighbourhoods have talked regarding this. We all disagree, die to health reason, pollution etc. |
| | Yasmin Aktar Resident | Disagreed with Preferred Approach I have a disabled daughter and you are making waste sites which I will have a problem with. We will not bear the waste site's smell. |
| | Mohammed Rafique Resident | Disagreed with Preferred Approach People living in this area are not happy that you are making waste sites. Please do not make this. |
| | Sham Mohammed Akbar Resident | Disagreed with Preferred Approach I believe there are plans to have such a facility opposite my house (Princeville Road / Brown Royd). This is a residential area. If such a facility here, it would cause us a lot of problems. |
| | Mohammed Rahim Resident | Disagreed with Preferred Approach No need to bring a hazardous and detrimental waste facility to this vicinity. |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Ian Smith English Heritage | <p>Sound - We welcome the inclusion of heritage designations within the list of sensitive sites where there is recognition that buffering may not be sufficient to mitigate potential negative effects.</p> <p>Unsound - We welcome the inclusion of a Criterion covering the historic environment. However, national policy guidance in PPS5 makes it clear that, in determining development proposals affecting a heritage asset, the impact of that development upon its setting is a material consideration. For a number of assets, their “setting” may include land at some distance from the asset itself (i.e. it can go beyond land which is “adjacent” or “in close proximity” to the asset).</p> |
| | John Hollister URS Scott Wilson on Behalf of Earth - Tech Skanska | Agreed with Preferred Approach |
| | Cheryl Brown Steeton-with-Eastburn Parish Council | <p>We suggest that consideration should be given to using the District’s <u>canal network</u> 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 <u>canal transport uses the least energy per tonne.kilometre of all transport systems</u> (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 a 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 (!) – 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, etc</p> |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mohammed Bashir Resident | Disagreed with Preferred Approach |
| | Zulakha Bi Resident | Disagreed with Preferred Approach School very close by you should look at non-residential area within ½ mile radius. |
| | Ajaib Hussain Resident | Agreed with Preferred Approach I agree business waste should be addressed and dealt with but there is nothing in it for residential. |
| | Graham Fisher Resident | Agreed with Preferred Approach |
| | S Mortimer Resident | Disagreed with Preferred Approach |
| | C Smithson Resident | Disagreed with Preferred Approach |
| | Lesley Matthews Resident | Agreed with Preferred Approach There is enough land available that is not residential. |
| | Tony Dylak Royds Community Association | Disagreed with Preferred Approach Your assessment criteria is too narrow. As stated, some sites zoned as industrial contain significant housing. Local cultural amenities, it was explained, can only be counted if they are listed, but this cuts out churches and places of worship, community centres and buildings, and public open space. Schools seem only to be counted if they are next door to the proposed site, which again is too narrow. It is to be hoped that the consultation is real, and that genuine concerns will be reported and will impact on final decisions. Public health and well being, which is now a statutory duty for the Council, should really form a part of your assessment, but this is not currently the case. |
| | Dennis Flaherty Resident | Disagreed with Preferred Approach |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mr T.A. Otty Resident | Agreed with Preferred Approach Conditions and lovely view spoiled, also having to pay a top Council Tax. |
| | Audrey White Resident | Disagreed with Preferred Approach Whatever it is it should not interfere with residential properties. |
| | James Podesta CBRE – on behalf of Chesapeake Ltd | Disagreed with Preferred Approach |
| | ID Planning on behalf of Ogden Properties | Disagree with preferred approach to assessing potential future waste management sites – ‘Environmental designation and heritage’. The text suggests sites should not ‘be or contain’ such features. The text should be expanded to take account of Environmental designations and heritage assets ‘adjacent to/in close proximity to ‘ proposed sites so as to avoid harm to these sensitive areas. |
| | James Cheeseman For an on behalf of Jones Lang LaSalle For and on behalf of BMW UK Trustees Ltd | Agreed with Preferred Approach |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | James Podesta CBRE – on behalf of Chesapeake Ltd | <p>Alignment with Strategic Objective</p> <p>Policy EC2 of the Core Strategy FED states that it will support business and job creation in the district by planning for a supply of developable employment land over the LDF plan period. The site is currently allocated as an employment site in the RUDP and forms part of a larger site, including our client's existing operating industrial unit, which currently provides substantial employment. These premises may need to expand in the future and hence, the land should be maintained for general employment purposes in order that our client can do this without needing to relocate elsewhere. By retaining the site for such use, jobs can be retained and created for the surrounding area rather than being lost.</p> <p>Site Proximity to Sensitive Uses</p> <p>Firstly, different uses will have different sensitivity to a waste management facility, which should be expressed within classes of sensitivity i.e. for example, community facilities used periodically are likely to be less sensitive than a hospital, which is used continuously. Furthermore, any residential property will be sensitive to waste management facility if located close by, regardless of its density, with noise, air quality and odour likely to cause detriment to residential amenity. Lower densities reduce the volume of residential property affected low, and hence the relative sensitivity, but this does not mean that the use cannot be considered sensitive.</p> |

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| Rep ID | Name / Organisation | Summary of Representation |
| | Continued. | <p>The assessment does not consider distance of the assessed site to the sensitive use, instead only considering uses of 'immediate adjacency'. Again, this fails to appreciate the nuance of sensitivity. It would be more appropriate to assess this criterion using a matrix of high to low sensitivity against distance from site. (See full rep for Figure 1 – Matrix for Assessing Sensitivity). Our client's site is located close to medium density housing to the north on Benn Crescent and Benn Avenue and west along Hollingwood Lane and industrial use to the south and east. Furthermore, an extent planning permission for high density residential development comprising of 140 houses exists for a site west of Hollingwood Lane, within close proximity of the site. Given the matrix suggested (see full rep) our client's site would be rated red opposed to its current green rating.</p> <p>Site Accessibility to Transport Networks</p> <p>We argue that more weight should be given to sites that in the first instance benefit from good access by rail freight and waterways or with the potential to provide access at low cost (i.e. rated green). Sites with good access from the Strategic Road Network (i.e. within 1km), a direct existing road access or the potential to provide access at low cost or within the potential to provide access by rail freight or waterways at higher cost should then be considered (i.e. rated amber). Finally, the site's poor access from the Strategic Road Network (more than 1km) and to rail freight and waterways or where the site has no direct road access and the provision is considered to have a significant cost to make the development unviable should be considered last (i.e. rated red).</p> <p>Physical Development Constraints</p> <p>Our client's site currently includes a small structure located centrally and a number of floodlights. However, contrary to the standards, the site is rated green for this criterion. Applying the standards correctly would suggest that the site should be rated amber at best.</p> <p>Extant Planning Consents</p> <p>The standards against which this criterion is assessed makes it clear that sites with no extant planning permission should be rated as amber, Our clients site has no planning permission and therefore should be rated as amber as opposed to the green given as part of the October 2011 assessment.</p> |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Continued. | <p>Current Use</p> <p>Under this criterion, a vacant or unused site is granted the same rating (green) as a site which benefits from an existing waste management facility. There appears to be no restriction on the type of site that can be rated green as long as it's vacant. We consider that this gives excessive weight to vacant sites. We therefore suggest that the standards for this criterion are amended. Sites with existing waste management facilities with the potential to expand should be prioritised alongside sites in B Class employment which are vacant and easily capable of alteration (i.e. rated green). Vacant or unused sites should then be considered (i.e. rated amber). Finally, sites in existing use or under construction for a Conflicting activity should be considered last (i.e. rated red). Our client's site is a sports pitch and as such would result in an amber rating.</p> <p>Site Ownership</p> <p>The site assessment places sites in single private ownership, even when the owner is unwilling to sell to the Council, as possessing the same relative ease of delivery as sites owned and controlled by the Council. Clearly, this is not the case as sites where existing owners are unwilling to allow development for waste management facilities to occur pose a significant barrier to development.</p> <p>Development Cost Value for Money</p> <p>It is unclear how this has been assessed and again we refer to our earlier comment questioning whether investigations have taken place regarding the existence of utilities networks across the site.</p> <p>It is our opinion that the overall assessment methodology, which gives equal weight to each criterion, is unfairly weighted towards the suitability under planning policy and as a result does not give sufficient consideration of issues of availability and viability. [See figure 3 in full representation for suggested weighting].</p> |

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| Rep ID | Name / Organisation | Summary of Representation |
| | Toni Rios Highways Agency | <p>Although the 'long list site assessment criteria' refers to site accessibility to transport networks it does not test any constraints of an unacceptable transport impact. It should not be assumed that the impact on the Strategic Road Network will be acceptable and mitigation may be required.</p> <p>The use of the term Strategic Road Network should also be clarified. The Strategic Road Network is the network of Motorways and Trunk roads managed by the Highways Agency. There are parts of the document which seem to refer to the Strategic Road Network in a wider sense incorporating the Local Road Network. This distinction needs to be clarified especially as it is used in the assessment and site selection criteria.</p> |
| | M. J Rowat | <p>Disagree with Preferred Approach</p> <p>All criteria have been given the same weight. Due to the nature of the proposed use proximity to residential, amenity and school areas should be given much greater weight than any- an automatic red, or outright rejection as to suitability of the proposed site.</p> |
| | Mohammed Saleem Resident | <p>Agree with Preferred Approach</p> |
| | Rev James Callaghan Resident | <p>Disagree with Preferred Approach</p> <p>At the 'DROP IN' sessions for the public, it was explained that cultural amenities in any given area being proposed for waste management sites, will only take account of listed buildings. This is too narrow a classification of cultural amenities and fails to distinguish between listed buildings which are empty and those frequented by members of the public (see further overleaf).</p> <p>Similarly, schools and nurseries seem only to be considered if they are quite literally next door to the proposed site. Smoke and fumes travel!</p> <p>Issues of Public Health seem largely ignored. What consideration has been given to the environmental impact, particularly of gasification and pyrolysis? Public health and wellbeing are a statutory duty upon every local authority.</p> |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Ashiq Hussain Resident | Disagreed with Preferred Approach |
| | Adeel Ashraf Resident | Disagreed with Preferred Approach |
| | M. Maskeen Resident | Disagreed with Preferred Approach |
| | Huss Nain Resident | Disagreed with Preferred Approach |
| | Wakkas Ashraf Resident | Disagreed with Preferred Approach |
| | M. Afzal Resident | Disagreed with Preferred Approach |
| | Rajab Resident | Disagreed with Preferred Approach |
| | M. Mushtaq Resident | Disagreed with Preferred Approach |
| | Q. Hussain Resident | Disagreed with Preferred Approach |
| | M. Rafique Resident | Disagreed with Preferred Approach |

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| Rep ID | Name / Organisation | Summary of Representation |
| | M. Hanif Resident | Disagreed with Preferred Approach |
| | Mr M. Saddif Resident | Disagreed with Preferred Approach |
| | Mohammed Najib Resident | Disagreed with Preferred Approach |
| | M. Suloman Resident | Disagreed with Preferred Approach |
| | T. Hussain Resident | Disagreed with Preferred Approach |
| | Khadir Hussain Resident | Disagreed with Preferred Approach |
| | M. Azam Resident | Disagreed with Preferred Approach |
| | M.N. Patel Resident | Disagreed with Preferred Approach I disagree on this location. |
| | Kasim Gulfam Resident | Disagreed with Preferred Approach |
| | Asif Shafiq Resident | Disagreed with Preferred Approach |
| | Subtain Mahmood Resident | Disagreed with Preferred Approach |

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| Rep ID | Name / Organisation | Summary of Representation |
| | Kamran Hussain Resident | Disagreed with Preferred Approach |
| | Amir Rafiq Resident | Disagreed with Preferred Approach |
| | Nasar Mahmood Resident | Disagreed with Preferred Approach It will be disgusting to live here. |
| | Gulzreen Resident | Disagreed with Preferred Approach |
| | Abdul Shmad Mughal Resident | Disagreed with Preferred Approach |
| | Asam Ifrahim Resident | Disagreed with Preferred Approach |
| | Mr Suhail Baig Resident | Disagreed with Preferred Approach |
| | Zia Hussain Resident | Disagreed with Preferred Approach |
| | Mazhar Zabal Resident | Disagreed with Preferred Approach |
| | Nafis Akhtar Resident | Disagreed with Preferred Approach |
| | Mohammed Rahim Resident | Disagreed with Preferred Approach |

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| Rep ID | Name / Organisation | Summary of Representation |
| | Shakir Abzal Resident | Disagreed with Preferred Approach |
| | M. Bilal Resident | Disagreed with Preferred Approach |
| | P. Patel Resident | Disagreed with Preferred Approach |
| | Raja Fazal Rehman Resident | Disagreed with Preferred Approach |
| | Shahid Sadiq Resident | Disagreed with Preferred Approach |
| | A. Rehman Resident | Disagreed with Preferred Approach |
| | A. Mahmood Resident | Disagreed with Preferred Approach |
| | Liaqat Khan Resident | Disagreed with Preferred Approach |
| | Negat Akhtar Resident | Disagreed with Preferred Approach |
| | Ali Asghar Resident | Disagreed with Preferred Approach |
| | Mohammed Hameed Resident | Disagreed with Preferred Approach |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mohammed Yasin Resident | Disagreed with Preferred Approach Absolutely not – will cause many problems, such as environmental pollution and residents will suffer especially vulnerable people such as the elderly and children. |
| | Mohammed Ayaas Yasin Resident | Disagreed with Preferred Approach Environmental pollution will cause further and wider health problems to the community as a whole. |
| | Mohammed Awees Resident | Disagreed with Preferred Approach Air pollution (smell to nearby residents). Rat Infestation. |
| | Mohammed Azeem Resident | Disagreed with Preferred Approach |
| | H Fishwick Resident | Disagreed with Preferred Approach |
| | Mrs Nadia Begum Resident | Disagreed with Preferred Approach It would be very unhealthy and more mice regarding dirt. |
| | Mohd Aftikhar Khan Resident | Disagreed with Preferred Approach |
| | Mr Sardar Ali Resident | Disagreed with Preferred Approach |
| | Mohammed Munir Resident | Disagreed with Preferred Approach |
| | Mohammed Shakeel Resident | Disagreed with Preferred Approach |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Steve Gibbs The Arley Consulting Company Ltd on behalf of P Caey (Enviro) Ltd (PCE) | Similarly, in relating to “facilities” (para 5.3 et seq) and relating only to MSW and C&I waste sites, we assume that Policy W6 does not apply to landfill. Policy W6 does not appear to be a Policy, but an account of the methodology of an assessment exercise. The policy appears to be either that all sites should be assessed against all the criteria, or that the shortlisted sites are identified. |
| | Chris H Smith Natural England | With regard to Paragraph 1 on Page 14, Natural England recommends that additional environmental assets set out in comments relating to the Revised Site Assessment Report be addressed. The site assessment criteria, sustainability criteria and deliverability criteria list would benefit from greater clarity. Also, the document would benefit from clarification on how the criteria set out on Pages 15 and 16 relate to the themes listed on Page 14. The provision on ‘Visual/Landscape’ Impact requiring sites to be tested against potential visual or amenity impact and whether management or mitigation would achieve impact avoidance is supported by Natural England. |
| | GJ Llewellyn Resident | Disagreed with Preferred Approach As a result of discussion at the RDSC consultative event: <ul style="list-style-type: none"> ▪ I think that suitability criterion 5 is too restrictive as it would prevent use for schools, residential / shopping developments etc. ▪ On the other ‘side of the coin’, an additional criterion should be “proximity of site to source of waste”. (I believe that information on recycling / amount of waste from specific areas of Bradford is not available). ▪ All sites previously considered, and those to be considered in future, should be objectively assessed against the agreed criteria and should not be excluded due to petitions etc (the removal of the Silsden & Girington Sites is very questionable on a number of grounds). |
| | Fazal Karim Resident | Disagree with Preferred Approach Residential and employment land should be put to better usage. |
| | Iftikar Ali Resident | Disagree with Preferred Approach Residential areas should be protected. |

| W6 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Z Karim Resident | Disagreed with Preferred Approach Not nearby to commercial viable land |
| | Mohammed Al Khan Resident | Disagreed with Preferred Approach |
| | Mr & Mrs Mohammed Resident | Disagreed with Preferred Approach No, this has put a lot of pressure on all the neighbourhood. We strongly all disagree with this to go on. |
| | Yasmin Aktar Resident | Traffic will increase. This site is good for greenbelt. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Nicholas Hewlett | <p>Oh dear. What on earth does the Council think will happen about the traffic? Everyone uses Ingleby Road because it's the ring road. Last week I wrote to the Highways Department at Flockton House because gridlock occurred – again. Cemetery Road is used by wagons and sat nav junkies to avoid Ingleby Road. No-one can turn left from Great Horton Road to Horton Grange Road because there is little space to do so. These roads are frequently full of stationary traffic. The Council has continued to encourage people to live in Bradford 7 but the infrastructure has not been developed. The full horror of the traffic light maze between Great Horton Road/Cross Lane and Great Horton Road/Moore Avenue/Hollybank Road is only apparent when you drive up it, past Tesco's, with its efforts at world domination, multiple bus stops and wild driving. No waste wagons would want to go up there. Has any Council officer spent much time driving between Tesco and Morrison's at Girlington recently? Or from Lidget Green to Four Lane Ends? Hyperbole apart, the traffic volumes are often high from about midday until 7 p.m. so how on earth the Council expect waste wagons to get through is questionable. Now for the grand finale, the last nail in the coffin, of residential life in Bradford 7 – a waste management site at Paradise Green. Someone has land to sell and the Council want to buy it, perhaps. So it says on the plan – private land. It's right behind Field Packaging. They already have wagons in and out. I have been working in that area for the past few years. When it snowed all the cars slid back down Hollingwood Lane because although it's an ambulance route, and a bus route, and a heavily-used rat run, and a school route (Hollingwood Primary School), it is still narrow. The wagons could not get along Clayton Road, either, because the traffic in the morning into Bradford frequently extends from Lidget Green all the way back to Clayton; people do u-turns at the junction of Hollingwood Lane and Clayton Road owing to the queues coming from Clayton. Hollingwood Lane cuts off a lot of traffic-light action along Becksie Road and Cross Lane. As Bradford 7 is mostly residential and not industrial, I would suggest that waste management is not a compatible activity with family life. Or move everyone out of the way of the waste. I suggest also that you set up a camera at Lidget Green traffic lights and watch the volume of traffic, and keep an eye on Cemetery Road, and form an image of what result large wagons full of smelly waste would have. Bowling Back Lane is one thing, but residential and still quite leafy Bradford 7 is another.</p> |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mohammed Bashir Resident | I oppose this site because of the following issues: 1. Traffic Increase 2. Pollution 3. Residential Area 4. Too close to at least 3 schools 5. Too close to Food Factory (Sea Brookes) |
| | Zulakha Bi Resident | Not keen to have it there. It will cause disruption for traffic, smell and noise. |
| | Ajaib Hussain Resident | I strongly disagree with this site because it is bang on and next to a residential area and where I live. This site is totally a no from me. There are 3 schools very close to this site, including residential homes. I feel having this site here would de-value our house prices and degrade this area. I would rather see this site having new homes or a park built on it. There is a very big shortage of homes. Also this area people are living in 3 bedroom homes when a 5 bedroom home is needed due to the size of the families. |
| | Michelle Swallar Resident | I have concerns regarding the adverse impact on the flood plant opposite. I would suggest that other sites are far more suitable for example the Euroway and Odsal sites, which already have better road networks. Residential areas such as Site's 31 and 1 and by far the wrong places for these types of plants. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Tony Dylak Royds Community Association | <p>This site could be considered for clean and dirty material reclamation only. It cannot be a site for gasification, pyrolysis or biological treatment. These are some of the reasons why:</p> <ol style="list-style-type: none"> 1. The immediate area has a very poor air quality. It is adjacent to the ring road, and there are considerable noxious chemicals in the air from heavy traffic, particularly heavy goods vehicles. This is mixed with the fatty discharge into the air from Seabrooks Crisps, which is adjacent to this proposed site. Clean air filters used in local homes are unable to cope with the chemical mix in the air, and have to be replaced quarterly rather than annually as advised by the manufacturer. Poor quality air is known to have an impact on cardiovascular disease and to affect heart health. Further noxious discharges into the air are simply not advisable in an area with proven poor air quality. 2. The ring road (Ingleby Road) is already at capacity at certain times of the day, especially early morning and late afternoon into the evening. The road is particularly congested on Saturday and Sunday afternoons. This is because, apart from being the ring road, there is Morrisons Supermarket, Lidl's Supermarket, a large Electrical Store, an Asian supermarket, Wickes DIY Store, Dominos Pizza, a Subway, a video Blockbuster store, plus as other places of employment and places of worship. Whilst a Section 106 could be imposed to improve such things as the junction into Ingleby Road, the proposed site will merely pump more traffic onto an already congested road. It is difficult to imagine how the capacity of the road could be increased. 3. There are already two schools within the discharge area of the proposed site. More worryingly, a new school is about to be built on the Grattan Warehouses site, opposite the entrance to the proposed site. Children, staff and parents cannot be subjected to more noxious fumes and discharges than are already in place, and the proximity of three schools must be taken into account in your narrow assessment criteria. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | | <p>4. This area is deficient in open green space, so the quality of the environment is extremely poor. This also impacts on public health and well being. It would be far better to develop the proposed site as an urban park which local schools, residents and employees could use. Possibly the site could be developed as an urban recycling and waste management project, helping users and visitors to better understand how to manage waste more effectively and to value the environment. Some tree planting would help to soak up some carbon discharges, and in turn contribute to an improved air quality. I realise this isn't what you want to hear, but in an already congested area without any local plan or neighbourhood plan, and with no-one really to speak in its defence within the Council, this is the only way perhaps to introduce a more sustainable approach to waste management for this poor area.</p> <p>Clean and dirty material recalamation of course could be considered. The impact of increased road traffic is the key issue, but this could be offset if the site created real local employment and opprtunites for local school projects on waste mangement and recycling. Ideally though, this site would be taken off the shortlist. If the open space project could be considered, even better.</p> |
| | <p>James Cheeseman</p> <p>For an on behalf of Jones Lang LaSalle For and on behalf of BMW UK Trustees Ltd</p> | <p>My client BMW (UK) Trustees Ltd are landlords of the neighbouring Wickes Unit</p> <p>I have received the various documents and I am happy with the consultation procedure thus far but would like to be kept informed of any further development.</p> <p>I am concerned about the potential adverse impact of such a waste management facility on the value of my client's property however I also note that the use of such vacant land could improve the area significantly.</p> |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>This site lies mainly in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site.</p> <p>A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. In addition flood zone 3 encroaches on the site at the boundary which runs along Bradford Beck. As such, any development proposals should take a sequential approach to site layout and avoid any development in flood zone 3.</p> <p>We do not hold modelling information for this watercourse and so any applicant may wish to contact Bradford Drainage Department for further information.</p> <p><u>Biodiversity</u></p> <p>The proposed site is in close proximity to an existing watercourse. PPS9 requires that planning decisions should prevent harm to biodiversity interests and should seek to enhance biodiversity where possible. Article 10 of the Habitats Directive and paragraph 12 of PPS9 stress the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way.</p> <p>Wherever possible, development should be set back from the watercourse to provide a wildlife buffer zone. The buffer zone, which should be at least 8 metres wide, should be free from all built development. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and be appropriately retained and managed throughout the lifetime of the development.</p> |
| | Mohammed Saleem | This site is near a residential area and close to a primary school. In my opinion the waste site would pollute the local area causing health problems. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Rev James Cameron Resident Co signatories Julie McDonald Iryna Bojczuk Robin Reid Sharon Nelder Patricia Bentley Nora Kilcoyne David Jason Kennedy Mrs Elizabeth M. Buffham Anges Hawley Stephen, Kathleen & Thomas Dalton Mr & Mrs Verity Helen & Gary Rolue Anne, David, Joanne & William Lauram D Louram Terrence A. Louram Margaret Dylak William J. Lever Mrs Sheila Kelly Garry Pearson & Beatrice Pearson Susan Bannon Bridget & Noel Howley Christine Hannah Nancy Latouche Lisa Dowling | <p>Objection to the site- with co-signatories</p> <p>We would object to waste management as you have described, at this site on the following grounds:-</p> <ol style="list-style-type: none"> 1. This area suffers very poor air quality. This is largely due to the immense volume of traffic on Ingleby Road whereby petro-chemical emissions are mixed with the discharge of fat-laden steam into the air from Seabrook's Crisp Factory which is located only a matter of metres from your proposed site. This is precisely the circumstance which exacerbates respiratory and cardio-vascular disease. Other issues apart, the amount of residential property immediately to the south of the proposed site means that there is a Public Health issue in discharging further pollutants into the atmosphere. 2. Ingleby Road is already stretched to capacity in terms of traffic flow and can often be at a complete standstill first thing in the morning, late afternoon into early evening and especially on Saturday and Sunday afternoons. The area has a number of large retail outlets attracting many thousands of shoppers each week as well, of course as the staff who work there, Additionally, in excess of 1,000 people each week use the churches and mosques in the area. 3. Two primary schools are already in the immediate vicinity of the proposed site and we are given to understand locally that there is a proposal by the council to build a third primary school on the site of the former Grattan Warehouse. Children and their teachers simply cannot be subjected to even more atmospheric pollution than already exists and the proximity of three schools has to be factored into your assessment. 4. In conclusion, gasification and pyrolysis should not be considered for this proposed site and while clean and dirty material reclamations could be considered, there would have to be proper analysis of the impact of heavy goods vehicles delivering waste to the site with the consequent increase in pollutants. We will be in dialogue with the other churches in the area so that all are alert to where these proposals might go. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mrs Pat Parke Antonio Frani & Razil Frani Clare Gardner Tracey Bottonley Babu Lukose Victoria Foster Susan Goodwin Irene Fagan Mr & Mrs Hart Nadia Ali Susan McConnell T Richards Julie McDonald Delisa Pickles Kathleen Patefield Mr & Mrs Grayson Zoe and Simon Ridewood Margaret Swinbank A Deans Elaine Davis Alison Kimber Sharon Jeffrey Helen & Harry Matthews Teresa Warszylewicz David & Susan Robinson Kath Callumbien Paul Baldwin Doren & Alf Crabtree Teresa Barusevicues Lorie Amba | |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Miss Mary C. Monaghan Mr & Mrs J & P. Hall Mrs R. Mistry Andrea Lyle Danny Kitcheman Helen Wray Allison Chippendale Philip Steel Mrs S. M. Monaghan Nick & Anne Spaelir Geoffrey Barber & Anita Barber Tracy Vento Peter Shackleton H. Bradley Mrs Snehal Kajar Mr Vishal Kajar Katie & adam Digby M. P. Northrop H. Hodgson Mrs D. Hird Anita & Benjamin Jowett Tom and Mai Pickles Tad & Margaret Jandzio Mrs C. & S Fawbert Miss K. Lawrenson Mrs J. Lawrenson Madeleine Davison Gwen Serry Joseph & Nora Nunn | |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Jo, Victoria, Clare & Tim Mulley Mr Andrew Haigh & Mrs Maria Haigh M. J. Dickinson Brenda Bolland Mr & Mrs R. Poole Mrs W. Whilde G.B. Nilde Mr & Mrs Piras John Samuel Mr Anthony Walsh | |
| | Ashiq Hussain Resident | 1. The waste chemicals that are in the air not good for the children and elders. 2. There is a lot more traffic on Ingleby Road, Legrams Lane and Thornton Road due to domestic waste. 3. We would prefer a park for the children in our area. |
| | Amar Rafiq Resident | 1. It's a residential area 2. Attract vermin 3. Create bad smells 4. Heavy vehicles are not good with kids around. |
| | Nasar Mohammed Resident | This is a residential area, there is a kids school close by and this would cause problems. It would be appalling to live in the area with the smell. |
| | Gulzreen Resident | Foul smell / vermin. Not ideal / residential area. |
| | Abdul Sahmad Mughal Resident | Foul smell / vermin. Unwanted traffic. Eyesore. |
| | Mohammed Yaqub Resident | Next to mosque not suitable. Because of the location in a residential area. Plenty of kids around and large vehicles will be around. Will attract mice and rats. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Negat Akhtar Resident | Although a lot of jobs will be available, but a lot of health issues will raise as well. You should have waste management on a site where public is far from pollution etc. |
| | Ali Asghar Resident | This site is close to a primary school that is why it is not suitable and it will cause pollution in the area. There is already smell in the area because we already had a sewer running at the site. This will also cause a traffic hazard. |
| | Mohammed Hameed Resident | It is already smelling because there is already sewers running there and if this site opens it will get worse. There will also be a lot of traffic and commotion. We would rather have a play area for the children in the community. |
| | Mohammed Yasin Resident | I do not agree with this at all as residents will suffer – also will cause health problems in particular to vulnerable residents and public members. Increase of illnesses and contamination will make further issues as a whole. Risk to other warehouses / companies in operation nearby, will also cause further issues. |
| | Mohammed Ayaas Yasin Resident | In this area there has been no such developments made in the past and this will cause major disruption to the local community and will also affect the local shopping complexes nearby. |
| | Mohammed Awees Resident | I do not agree for the (wrws) on this site. Due to H&S Regulation to health and pollution. Air Pollution (smell) Rat infestation. Illness and diseases. Vulnerable to OAP walkers Pollution to Seabrooks Crisp Factory |
| | Mohammed Azeem Resident | We do not need this waste place here because it is already smelling and there is too much traffic here and we will need a place for old people and kids. |
| | H Fishwick Resident | No waste on this land, too near houses. |

| SITE 1 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Mrs Nadia Begum Resident | I am not happy for this area to be a waste site because there is a lot of pollution already with too much traffic. There is a high population of people which would make our children and everyone ill. You should make a site in an area where there are no residents in the area. Already there is a lot of rubbish around. |
| | Mohd Aftikhar Khan Resident | I do not wish this area to be used for waste disposal. As it is a residential area around this site and it will be a potential health hazard. |
| | Mr Sardar Ali Resident | I do not wish this area to be used for waste disposal. As it is a residential area around this site and it will be a potential health hazard. |
| | Mohammed Munir Resident | I do not wish this area to be used for waste disposal. As it is a residential area around this site and it will be a potential health hazard. |
| | Mohammed Shakeel Resident | I am against the site because it will bring a lot of smell around the area and it will be a hazard for the whole area. |
| | Chris H Smith Natural England | Revised Chapter 5 ought to provide full details of Site 1's relationship to sensitive uses. At present the descriptive paragraph in Revised Chapter 5 fails to mention a school in close proximity, as per the Revised Site Assessment Report. |
| | Sham Mohammed Akbar Resident | I live locally and the last thing I want is for a waste management site to be so close. It will make our lives a misery and cause all sorts of problems. We won't be able to open our windows in the summer as the smells will be unbearable. Please don't put it here. It should be kept away from all residential areas. |
| | Mohammed Rahim Resident | We do not support anything of this sort in this local area. No other area would allow this infringement of their rights. |

| SITE 11 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Ajaib Hussain Resident | No. Residential areas exist. |

| SITE 11 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Toni Rios Highways Agency | The Highways Agency would like to understand more about the potential trip generation for this site. It should not be assumed that the impact on the Strategic Road Network is acceptable. A transport assessment will be required to demonstrate the impact on the Strategic Road Network. |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site.</p> <p>A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha.</p> <p>Our records indicate that a watercourse runs along the western boundary of the site. We would object to any proposals involving building over the watercourse and recommend that an easement of a minimum of 3m is maintained. This is to ensure a provision for access is maintained.</p> <p><u>Biodiversity</u></p> <p>The proposed site is in close proximity to an existing watercourse. PPS9 requires that planning decisions should prevent harm to biodiversity interests and should seek to enhance biodiversity where possible. Article 10 of the Habitats Directive and paragraph 12 of PPS9 stress the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way.</p> <p>Wherever possible, development should be set back from the watercourse to provide a wildlife buffer zone. The buffer zone, which should be at least 8 metres wide, should be free from all built development. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and be appropriately retained and managed throughout the lifetime of the development.</p> |
| | Chris H Smith Natural England | Due to the Ripley Road site achieving "green" scoring across all 14 criteria, Natural England has no comments at this time. |

| SITE 31 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Councillor John Godward Great Horton Ward Councillor | My principal objection is that the proposed site is too near dwellings on three sides and residents in the area will be prevented from their enjoyment of their amenity. Secondly, the proposed Waste Management site will attract more traffic through Lidget Green via Legrams Lane, Cemetery Road, Beckside Road, Clayton Road and Hollingwood Lane and this too will be detrimental to the residents of the area. The proposal may affect the proposed housing estate due to be built on the Chesapeak site when this factory is closed. |
| | Ajaib Hussain Resident | No. Residential areas too close by. |
| | Mr & Mrs Matthews | We live very close to the factory on Brackenbeck industrial estate, which s 24 hours a day now you expect us to have 24 hour waste management site. Fields social club has been there over 30 years, why is it designated as industrial land not recreational land. Why have the Council decided residential areas with poor road access is almost green, count. |
| | Michelle Swallar Resident | I have major concerns regarding the loss of the recreational spaces and also feel that the residential area will be adversely affected in terms of site access, development, etc. |
| | Ms G Hancock Mr S Jackson Residents | 1. Roads are already busy & dangerous and not adequate to support further H.G.V. traffic. Also only 1 small access road to the potential site. 2. Existing football field & clubhouse buildings (understand is in trust) will be lost. 3. Near to schools, park & substantial housing. Don't class area as industrial at present and is to become a more built up residential area. 4. Already plans in force for housing on site on "Fields Packaging" site on Clayton Road – How will the potential waste site have effect on this and vice versa – more traffic, larger residential area & more children – all will need to be considered. Will any new residential get the opportunity to have a say in any potential waste site development. 5. Concerns regarding – risk of explosions, leakage, smell, vermin, health. |

| SITE 31 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Ms E White | As it will be directly behind my house it will affect my house price. Also wagons going in 24 hours a day the noise and smell will affect me and my family and what about all the rubbish. The land has been used for a social club and football pitch for as long as I can remember I came here in 1984. The club has spent a lot of money on the football team and club. I do hope you will think again about planning permission. It will make my life hell. |
| | Councillor Joanne Dodds Great Horton Ward Councillor | <p>I would like to submit my comments on the proposed site 31 Hollingwood lane, Paradise Green. I have visited the site with officers, talked to local residents and businesses and attended the consultation. I have not found one person who believes that this is a suitable site, far from it the community are totally against it.</p> <p>I would like to register my objection to this proposal because I do not believe that this is a suitable site for a waste treatment centre and these are my reasons:</p> <ol style="list-style-type: none"> 1) Although it is designated as employment land the use of land is recreation and has been for many years, we are looking at re-designation of this land. 2) Accessibility - Access into the site is poor, large lorries that are currently coming onto the site and making a right turn from Hollingwood Lane are having to drive over the pavement on the corner and are breaking all the pavement up. We are currently looking into this with highways because of the pedestrian island there is little room for manoeuvre with large vehicles. 3) Road Networks - What you need for this kind of site is a good transport networks, this area is a bottleneck and the roads surrounding this site can not cope with this kind of traffic. At the moment they are gridlocked and with all the future developments that are happening in Lidget Green its going to get worse. The reason why Fields, Chesapeake, (owners of the site) moved some of their operation was because of the poor transport links from this site. These roads around Lidget Green were not built to take this amount of traffic and they are really struggling. |

| SITE 31 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | | <p>4) Residential Area - Although the site is adjacent to businesses the area is generally residential. Next to the site is Benn Avenue, Crescent and Spencer Road. Across the road at the Chesapeake offices this has been given planning permission for houses, sorry I can't remember how many but I think it was around 150. Permission is granted and so once they start building all these houses just across the road it is also going to increase the pressure on the roads. The value of these houses are going to be reduced if this waste site is given the go ahead and also the properties surrounding are going to find their houses devalued, no one is going to want to buy a house next door to a waste treatment site.</p> <p>5) I have had a discussion with the Managers of Chesapeake who are against this proposal and were quite astounded when their land was advertised as a possible site for a waste management site. This has caused some embarrassment to the owners because the community believe that they were aware and they were not!!!!</p> <p>In future I would like to suggest that the Council talk to the owners of the land before advertising in the media and the public its intention with land which they don't own.</p> |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u> This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site. A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. 'Greenfield' surface water run off rates would be expected.</p> |
| | Chris H Smith Natural England | <p>As the shortlisted Hollingwood Lane site is currently used for private recreational purposes, Natural England has some reservations. Although not allocated as formal open space, the site provides an important leisure resource and contributes to the open space supply, in accordance with objectives set out in PPG17. For this reason, Natural England recommends that this site is not brought forward to the next stage.</p> |

| SITE 31 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | M. J Rowat | <p>I object to the proposed waste management site.</p> <p>My reasons are-</p> <ol style="list-style-type: none"> 1. Loss of amenity to members of Field Packaging Social Club who have used the land with the permission of Chesapeake and formerly of Field Packaging Company for many years for sports and social activities of both employees and members of the public. 2. Loss of value to residential housing within radius of at least one kilometre. This loss of value can be attribute to association of addresses with objectionable trades including waste management facility, exposure to emissions from the site itself and increasing volumes of heavyweight road traffic on Hollingwood Lane, Spencer Road and Clayton Road. 3. Unacceptable increases in heavy weight traffic commensurate with the annual plant processing capacity. Your representatives at the meeting indicated capacity to be in the range of 80-140,000 tones per annum. This represents 2000-3500 tone lorry loads, 4000-7000 20 tone lorry loads, or 8000 – 14000 ton lorry loads to be processed. This does not allow for any traffic removing processed material from the plant depending on the nature of the facility. Over say 260 days per annum there might be more than 50 lorries each day, every day delivering more or less objectionable material to the site. As well as smell, spillage, noise, vibration and fumes such increased traffic will have adverse effects upon existing traffic congestion at the Clayton Road/Hollingwood Lane intersection and along Clayton Road. 4. The land to the South West and South East of the proposed site is mainly residential, together with the amenity of Brackenhill Park to the South. The topology is steeply ascending in those directions, rising to a level above the likely chimney height of waste management facilities which might use the proposed site. The chances are high that there will be emissions of objectionable odours, particulate matter and/or noxious plumes which prevailing winds will cause to drift into these areas which include many homes, and several primary schools. 5. I note that the Revised Chapter 5 of the Preferred Solution shows all proposed waste management sites concentrated in one rather smal |

| SITE 31 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | | <p>6. Concentrated in one rather small area of the Bradford Metropolitan District. I strongly object to such a concentration of facilities for the processing of waste, much of which will be of material formerly covered by objectionable trades legislation and of which concentration this proposed site forms part. These plants should be dispersed as far as possible and be far away from residential areas.</p> <p>7. Discussions with your representatives at the Open meeting which I attended revealed that the Bradford Council would have no supervisory or controlling role in the operations of any waste management facility which might be built on the proposed site. The operators would be free to import such waste materials as might be processed on the site from any part of country, at least up to the maximum capacity of the plant, and to operate the plant in a way they deemed fit. Inspection and control would be the purview of national and therefore disinterested agencies.</p> <p>There is a further, rather complex objection to this particular site. The public is being asked to comment on its suitability of the site <i>as proposed</i>. This is the land comprising 2.3 hectares adjacent to Chesapeake's (field Packaging Company) current factory sites which spread both sides of Hollingwood Lane. In recent times Field Packaging canvassed local opinion, with the help of the Council, as to possible uses of their entire site (including the area which is now proposed for waste management) in the event that field packaging moved their operation elsewhere. It was determined that in such an event the preferred use would be for housing. Given the enormous premiums being paid by waste management companies for suitable sites I see it as a real possibility that were the proposed site to be approved, and if Field Packaging were to be minded to move operations elsewhere in the foreseeable future then this would afford the possibility of an expansion of waste management operations by a factor of 2 or 3 times that currently proposed. Given an existing waste management plant who else would wish to be next door?</p> |

| SITE 31 | | |
|---------|---|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Ian Sanderson West Yorkshire Archaeological Advisory Service | <p>For site 31, the south eastern corner of the site is believed to have been part of the site occupied by a water-powered, possibly medieval cornmill (our ref PRN 4248 which is a class iii archaeological site in current Bradford UDP terms) & we would recommend that this area of the site would require an archaeological evaluation in the first instance, should it be further developed. This would take the form of a detailed desk-based assessment, followed possibly by trial trenching or possibly a watching brief, depending upon the results of the desk-based assessment & the nature of the proposed development.</p> <p>We would note however that Preferred Policy W6 in the revised chapter 5 states that class iii archaeological sites should not be used as waste disposal sites.</p> |
| | Helen Ledger Sport England | <p>The explanatory text accompanying the site 31 of the revised approach details notes that the site does not include any 'cultural' constraints that would require mitigation; however we would argue this fails to recognise the sporting value of the site. The text also states that the site is 'cleared' and does not include any abnormally high development costs. This again fails to recognise the cost of replacing the playing field and ancillary sports facilities that may be triggered by Sport England's playing field policy and the government's national planning policy guidance note PPG17 – planning for open space, sport and recreation.</p> <p>Sport England therefore would object to the allocation of this site unless an allocations policy was drafted that could comply with PPG17 in particular paragraphs 10, 11, 13 and 15 and to comply with our playing fields policy.</p> <p>Sport England knows that one key omission of Bradford's LDF evidence base is an up to date Playing Pitch Strategy. If such a document was available this would fulfil the requirement for a 'robust assessment of need' referenced in paragraphs 10 and 15 of PPG17. The council does have a study adopted and published in 2006 with data collated in 2005, meaning the data now at least seven years old. The council has since carrying out this study made no efforts to monitor and review this strategy or research.</p> |

| SITE 31 | | |
|---------|---------------------|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | | <p>Sport England considers that in order for a strategy to be robust it needs to be up to date, to have been collected and analysed within the last three years, or regularly monitored within the three year period. This is because the demand for, and supply of, playing pitches changes regularly, often season to season and sometimes within a playing season. For instance Bradford had substantial changes to its pitch stock and sports facilities due to the Building Schools for the Future program and we would argue this and the time since the data was collected make the 2006 study out of date. This would mean that at this time we cannot test whether this site is needed in the future to support sport and therefore we cannot be assured that a waste site allocation could comply with our policy exception E1 to our playing fields policy and PPG17, paragraphs 10.</p> <p>A solution in policy needs to be developed to comply with our policy exception E4, unless evidence is updated to satisfy the approach in exception E1, to our satisfaction. Sport England would propose an allocations policy that references the current or last known use of the site for sport.</p> <p>If it helps resolve our objection Sport England would find the following policy allocation wording acceptable to resolve our concerns.</p> <p>For example:</p> |
| | | <p><i>Land at Hollingwood Lane is allocated as a waste site. Implementation of this allocation will only be acceptable if the developer replaces the playing field lost in a like for like or better quantity, quality and management arrangements in a suitable location <u>or</u> satisfactorily demonstrates by robust up to date assessment that there is an excess of facility provision within the catchment and there is no existing or likely future need for replacement provision.</i></p> |
| | | |

| SITE 31 | | |
|---------|---------------------|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | | <p>Sport England would seek to resist a proposed waste allocation on this playing field site unless such a policy approach was adopted in the final version of the plan. Should the council wish not to include the wording we propose above or amend the wording proposed we would maintain an objection at examination unless further consultation was had with ourselves.</p> <p><u>General comments</u></p> <p>In line with paragraph 33 of PPG17, planning obligations should be used as a means to remedy local deficiencies in the quantity or quality of open space, sports and recreational provision. Local authorities will be justified in seeking planning obligations where the quantity or quality of provision is inadequate or under threat, or where new development increases local needs.</p> <p>Sport England would strongly encourage the council to develop their own standards for developer contributions to recreation and sport; a completed playing pitch strategy would neatly underpin these. All housing tenures will potentially create deficits in sports provision.</p> |

| SITE 35 | | |
|---------|--|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | Ajaib Hussain Resident | Yes as it is in an industrial area. |
| | Graham Fisher Resident | This site (35) and Site 48 have historically been used for livestock grazing / biomass production and should be classified Grade 3 and retained for agricultural use. Note should also be taken of the public footpath (Bradford South Footpath 61) from the railway bridge to Staithgate Lane which bisects Site 35. The increase in traffic volume on Staithgate Lane would be a further burden on local residents. |
| | Mr & Mrs Khandubah Mistry Mr N Mistry Mr G Mistry Residents | I have grave concerns for the proposed site (site 31 – Hollingwood Lane, Paradise Green) for use as waste management as it is situated in a heavily residential area and believe this to be a potential health hazard. |
| | Dennis Flaherty Resident | Too near Toad Hall Beck. Too much industry built on Green Belt Land and why are 2 sites proposed in the same area. Would prefer you to find somewhere else. |
| | Mr T.A. Otty Resident | Still building new offices etc when offices are for sale all over? |
| | Audrey White Resident | We have not got A-Road system. The M606, Staithgate Lane and the rest of the roads are constantly grid locked. M/S plant is causing havoc on the highways round here. Need upgrading now without any additional traffic. Residents on Newhall Road Drive are also too close to development. |

| SITE 35 | | |
|---------|------------------------------|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | Sandra Warburton Resident | <p>The road infrastructure around the two sites on Staithgate lane and Merrydale cannot sustain the volume of traffic which will be generated by the proposed waste sites. According to a representative at the consultation in the Richard Dunn sports hall there would be “over hundred vehicular movements daily, ranging in size from the ordinary refuse wagons to 40ft long wagons”, this would be totally unacceptable.</p> <p>Access and egress from the sites would put more traffic onto the two busiest roundabouts in the Metropolitan District i.e. Chain Bar and Staygate either ends of the M606 motorway, this area is already congested at present let alone in 15-20 years. These sites would be in private ownership, private operators need to make profits, these operators would want to take the shortest routes to cut down on fuel expenditure, this would mean their only route North would be to travel ip Staithgate lane, which has a very narrow stretch with a blind bend, passing houses and office units. Waste could not be brought into these sites by rail from the nearby railway line as there is not enough straight rail space for goods wagons, these sites are adjacent to the tunnel entrance at the one end and the new passenger station at Low Moor due to be opened December 2013.</p> <p>This area has been undermined by coal and iron ore operations in the past, no proper records have been kept as to where these mine shafts and galleries are. Shortly after the M606 motorway opened part of the carriageway collapsed, this area will become even more unstable if yet more heavy wagons used it on a daily basis, the nearby houses and industrial units would suffer from subsidence from heavy goods vehicles constantly rumbling past.</p> <p>Staithgate Lane is used for on street parking by fans attending Odsal Stadium thus cutting down the road width, large vehicles would not be able to negotiate the road safely. Your representative said “We could put yellow lines down to prevent parking”, this would yet again cause upset to the residents of Staithgate estate by no street parking.</p> <p>Pollution from excessive vehicular movements, noise, light and odours would also be cause for concern by the local residents. Seepage from contaminates from the land sites into the water courses of Dean Beck, Toad Hole Beck and newly made wildlife trails used by the local schools and residents is also totally unacceptable. The nearby Hotel (Campanile) would also be affected; guests wouldn't want to stay surrounded by waste sites. Bradford wants to encourage</p> |

| SITE 35 | | |
|---------|------------------------------|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | | <p>people to work and spend their leisure time in the city, and as this area is one of the “Gateways to Bradford” it would definitely put visitors off.</p> <p>The Staithgate sites are Green field sites not owned by the Council next to clean industrial units and not already contaminated by waste, why not use some of the Council’s wholly or partially owned sites which are already in use i.e. Bowling Back Lane, Ripleyville, which have been used for years for waste and reclamation, modernise their facilities and sell or lease to private users thereby releasing some of the Brown field assets back into Bradford Council instead of taking yet more green space. Ripleyville site would be easily accessible by rail as there is land there previously used a railway goods yard.</p> <p>A possible site for consideration could be opposite the Dealburn Road waste recycling centre which was the site of the Wilson Road landfill site, this area is within an industrial estate.</p> |
| | Toni Rios Highways Agency | <p>The Highways Agency would like to understand more about the potential trip generation for this site. It should not be assumed that the impact on the Strategic Road Network is acceptable. A transport assessment will be required to demonstrate the impact on the Strategic Road Network.</p> <p>These comments apply to both sites at Staithgate Lane, Odsal [Site 35 & 48]</p> |
| | GJ Llewellyn Resident | <p>The attractiveness of this site seems, mainly, to be its proximity to the motorway network – which would enable processed waste to be ‘exported’ from Bradford (a practice which, I believe, will incur penalties). To get waste materials to this site (these sites) will place even greater stress on Staithgate Lane and the Staygate roundabout [already we have seen much increased traffic due to the Euroway / Staithgate Business because the M606 gets ‘clogged’]. This impacts on residents on the ‘Rooley’ estate as the traffic increase causes problems in accessing / leaving the estate. Also, there is a hotel in close proximity.</p> |

SITE 35

| Rep ID | Name / Organisation | Summary of Representation |
|---------------|--|--|
| | <p>I D Planning</p> <p>On behalf of Ogden properties</p> | <p>We consider the site is unsuitable for use as a waste management facility for the following reasons:</p> <p>After visiting the site we are of the firm opinion the topography of the site is not suitable for this type of development. The gradient of the site is steeply sloping rather than “gently sloping” as outlined in the DPD. If the site was developed the topography would result in a highly prominent development resulting in potential harm to the character and appearance of nearby employment developments.</p> <p>The proposed development would have a large and severe negative impact upon the local road network. The proposed development would increase traffic, in particular larger waste vehicles and congestion on the local network creating dangerous driving conditions for other road users.</p> <p>Creating access to the proposed site is also an major problem that needs to be overcome before anyone can make an informed decision on the appropriateness or otherwise of the allocation. The east site boundary, which borders onto Staithgate Lane, rises sharply to meet the road. This levels issue will create a major difficulty when attempting to create an access route onto the site. No highways evidence has been put forward to support the acceptability of the site access from this point.</p> <p>The development of a waste facility on this site would have a significant detrimental effect upon the continued successful development of Park 26, due to the future marketability of the scheme and the ability to attract inward investors onto prime employment land. Park 26 is a successful industrial development to the south of site 35 on Transperence way which is part developed. Park 26 is a traditional employment development in keeping with similar employment used in the area and will provide employment and attract businesses to the area.</p> <p>The proposed site is adjacent to a designated are of Urban Greenspace (UDP ref BS OSG1.4) and in close proximity to 3 Bradford Wildlife areas (BWA), all of which are designated SEGIs:</p> <p>BWA 133 (UDP ref BS/NE9.12) located to the north west of the site and is known as Odsal wood SEGI</p> <p>BWA 134 (UDP ref BS/NE9.14) is located to the south west of the site and is known as Railway Terrace/Raw Nook SEGI</p> <p>BWA 137 (UDP ref BS/NE9.16) is located to the south of the site and s known as Toad Holes Beck SEGI</p> <p>When considering proposals for Waste management Facilities, UDP Policies P8-P13 are considered relevant. The</p> |

| SITE 35 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Continued. | explanatory text to UDP policy P8 acknowledges that waste management facilities can generate significant heavy vehicular movements. Whilst the text indicated that such uses may be appropriate in employment areas, it is noted there is still a need to take care when assessing such proposals to ensure that adjoining sensitive land uses are not compromised by the siting of waste management facilities. It is considered the proximity of the proposed site to sensitive areas, namely the Urban Greenspace and more importantly 3 SEGIs makes this site unsuitable for Waste Management Facilities. There is no evidence put forward by the council in respect to ecology and the significant impact this would have to the 3 SEGIs. This employment allocation should be maintained for more typical B1/B2/B8 uses in keeping with adjacent developments and likely to have a far lesser impact on adjacent sensitive land uses and designations. |
| | Beverley Lambert Environment Agency | <u>Flood Risk</u> This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site. A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. 'Greenfield' surface water run off rates would be expected. |
| | Chris H Smith Natural England | Natural England has no major concerns regarding this site, although it is recommended that the Council investigates the impact any waste facility may have on the adjacent agricultural land. |

| SITE 48 | | |
|---------|--|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | <p>I D Planning</p> <p>On behalf of Ogden properties</p> | <p>We consider the site is unsuitable for use as a waste management facility for the following reasons:</p> <p>Topography no suitable for development(see comments for site 35)</p> <p>Impact on the local road network (see comments for site 35)</p> <p>Creating access is a significant issue (see comments for site 35). In addition the land levels at the southern end are lower than Transperience Way. These level issues will create major difficulty when attempting to create an access route into the site. The proposed site borders the already congested junction of Slaithgate lane, the M606 and Transperience Way. An access point would have to be placed a safe distance to this junction. Furthermore the border on to Staitthgate Lane is unsuitable for access due to the bends in the road creating a hazard for road users. Given the significant impact on the M606, The Highways Agency (HA) will need to be consulted and it is clear that there is no consultee response from this important statutory body. The planning system requires certainty in respect of allocations both in terms of deliverability and viability. If the HA maintain an objection to any major scheme which will impact on their network, this would impinge significantly on the deliverability of any given project. Therefore, without a definitive response from the HA, these sites cannot be deemed to be acceptable or appropriate. In summary it does not appear possible to create a satisfactorily access into this site.</p> <p>Detrimental effect upon the successful development of Park 26 (see comments for site 35).</p> <p>Site is adjacent to designated area of Urban greenspace (UDP ref BS OSG1.4) and in close proximity to 3 Bradford Wildlife areas (BWA), all of which are designated SEGIs (see comments for site 35)</p> <p>Page 13 of the Waste Management DPD within the preferred policy section, there is a reference made to shape of site, “sites should have a regular shape to allow development to take place.” Site 48 is an irregular shape with levels and access issues and thus not suitable for waste development. We suggest that if this site is taken forward, its size is significantly reduced at its southern end so as to create a more regular shape. The removal of the southern half of the site would provide an opportunity for substantial landscaping to create a buffer between Park 26 to the south and the proposed site to shield the waste management facility from Park 26.</p> |

| SITE 48 | | |
|---------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site.</p> <p>A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. 'Greenfield' surface water run off rates would be expected.</p> |
| | Ajaib Hussain Resident | Yes as this is an industrial area. |
| | Chris H Smith Natural England | Natural England has no major concerns regarding the Staithgate Lane South site; however, it is recommended that the text explains that Site 48 adjoins Site 35, with reference being made to the illustrative map on Pages 24 and 25. |

| SITE 78 | | |
|---------|-------------------------------|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Ian Smith English Heritage | This site lies approximately 500 metres to the south of East Riddlesden Hall, a Grade I Listed Building which has eight other Grade II Listed Buildings surrounding it. Whilst the assessment notes that this is a visually-prominent site, it does not go on to consider that this prominence might mean that development on this site could affect heritage assets at some distance from the site itself. Development proposals for this area would need to ensure that those elements which contribute to the significance of East Riddlesden Hall and the Listed Buildings which surround it (including their settings) are not harmed. This may, potentially, limit the form or scale of development on this site. This needs to be acknowledged within the Sustainability Appraisal together with how it envisaged that this be mitigated (in our response to the revised Chapter 5 we have suggested an amendment to the justification to Site 78 to alert potential developers of the need to have regard to these assets. |
| | Ajaib Hussain Resident | Yes as this is an industrial area and out of the way. |

| SITE 78 | | |
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| Rep ID | Name / Organisation | Summary of Representation |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site.</p> <p>A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. 'Greenfield' surface water run off rates would be expected for the currently undeveloped area of the site.</p> |
| | Chris H Smith Natural England | <p>At this time, Natural England has no major concerns regarding Site 78, although it is located in close proximity to undeveloped, open land. It is recommended that the Council investigates the potential impact on landscape character, as the Revised Site Assessment Report acknowledges the site is in a prominent location.</p> |

| SITE 92 | | |
|---------|---|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | <p>Steve Staines</p> <p>Friends, Families and Travellers and Traveller Law Reform Project</p> | <p>We have been informed of this consultation, having a potential effect on an existing Travellers Site at Mary street if site 92 at Bowling Back Lane were to be proceeded with.</p> <p>Too often in the past Gypsy and Traveller sites have been located in close proximity to hazardous or polluted locations. As it stands the Mary Street site suffers from the presence of the existing waste facility which does contribute to the sense of social exclusion which they suffer from.</p> <p>Plans to intensify or extend the waste facility will in our view impact negatively on the residents at Mary Street and we must object to this site being included within the list of sites in the revised chapter 5.</p> <p>We understand that the National Federation of Gypsy Liaison groups have responded to an earlier consultation in March of this year on this subject. We concur with their comments and wish that the concerns they raise be taken into account in the decision making process.</p> <p>We agree that development of Site 92 is contrary to PPS1 in that it does not promote social inclusion or personal-well-being and it does not support or contribute to a sustainable, liveable community. Furthermore we consider it detrimental to these aims.</p> <p>In the same way PPS10 Planning for Sustainable Waste Management says in paragraph 21 (i):</p> <p>“the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential”.</p> <p>Site 92 has an existing waste management facility and inclusion of the site in the development plan would mean an intensification or expansion of facilities. We agree with the Federation that one avenue to be explored would be relocation of the Mary street site as part of the development brief and that no development can take place without satisfactory relocation to a more suitable site. It was described in the local GTAA as having very poor quality surroundings.</p> <p>We also agree with the Federation that the proposal will have a high disproportionate negative impact and that it may conflict with the Council’s responsibilities under Race relations legislation.</p> |

| SITE 92 | | |
|---------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | John Hollister URS Scott Wilson on Behalf of Earth - Tech Skanska | While we support the inclusion of Site 92 in the proposed shortlist of sites set out at section 5.16 of revised Chapter 5, we find ourselves obliged to submit a holding objection to: - the reference to the achievement of a green rating in terms of 12 out of the 14 criteria in the description on page 27 of revised Chapter 5; and - the related assessment scores for Site 92 given in Appendix II of the Revised Site Assessment Report, since Appendix V in the Revised Site Assessment Report omits the completed site assessment proforma for Site 92 and we are therefore not in a position to either agree or disagree with the score of amber in relation to two of the selection criteria. |
| | Ajaib Hussain Resident | No as this is a residential area. |
| | Toni Rios Highways Agency | The Highways Agency has previously commented on this site. There are concerns that this proposal may generate significant inter district movements and we would like to understand more about the extent of these movements. As with the other sites we would expect a transport assessment to be provided which considers the impact on the Strategic Road Network. |
| | Beverley Lambert Environment Agency | <u>Flood Risk</u> This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site. A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. |
| | Chris H Smith Natural England | Natural England has some concerns regarding Site 92. Taking into account its close proximity to a Gypsy/traveller site, there is a potential for adverse amenity impacts to the occupiers of this residential site. It is also suggested the Gypsy/traveller site is better illustrated on the map on Page 27 to clarify how it may be affected. |
| | Sham Mohammed Akbar Resident | There's one here now, so why not keep it here. It's an industrial area and doesn't really affect anyone. |

| SITE 104 | | |
|----------|----------------------------------|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | Ajaib Hussain Resident | Yes as this is an industrial area. |
| | Dennis Flaherty Resident | Same as previous remarks [See Site 35 comments]. |
| | Toni Rios Highways Agency | The Highways Agency would like to understand more about the potential trip generation for this site. It should not be assumed that the impact on the Strategic Road Network is acceptable. A transport assessment will be required to demonstrate the impact on the Strategic Road Network. |
| | Chris H Smith Natural England | As Site 104 would require tree clearance there are potential adverse biodiversity impacts. Also, the undeveloped, open land to the east of the site is not described on Page 28. The potential impacts of a waste facility on the landscape are not addressed within the Revised Site Assessment Report simply stating 'none noted'. Natural England recommends that this is revised given the prominent location of the site within its landscape context. |
| | GJ Llewellyn Resident | See comments for site 35. |

| SITE 104 | | |
|----------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site.</p> <p>A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha. Flood risk from Hollowfield Beck should be considered in the FRA. Also, 'Greenfield' surface water run off rates would be expected.</p> <p><u>Biodiversity</u></p> <p>The proposed site is in close proximity to an existing watercourse. PPS9 requires that planning decisions should prevent harm to biodiversity interests and should seek to enhance biodiversity where possible. Article 10 of the Habitats Directive and paragraph 12 of PPS9 stress the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way.</p> <p>Wherever possible, development should be set back from the watercourse to provide a wildlife buffer zone. The buffer zone, which should be at least 8 metres wide, should be free from all built development. Domestic gardens and formal landscaping should not be incorporated into the buffer zone. The buffer zone should be planted with locally native species of UK genetic provenance and be appropriately retained and managed throughout the lifetime of the development.</p> |

| SITE 121 | | |
|----------|---------------------------|--------------------------------|
| Rep ID | Name / Organisation | Summary of Representation |
| | Ajaib Hussain Resident | No as residential area exists. |
| | Mr T.A. Otty Resident | No complaints. |

| SITE 121 | | |
|----------|--|--|
| Rep ID | Name / Organisation | Summary of Representation |
| | Audrey White Resident | I think is a possible. |
| | Toni Rios Highways Agency | The Highways Agency would like to understand more about the potential trip generation for this site. It should not be assumed that the impact on the Strategic Road Network is acceptable. A transport assessment will be required to demonstrate the impact on the Startegic Road Network. |
| | Beverley Lambert Environment Agency | <p><u>Flood Risk</u></p> <p>This site lies in flood zone 1 on the Environment Agency Flood Map (1 in 1000 year or less probability of river flooding in any one year). In accordance with PPS25, all types of development are suitable on this site.</p> <p>A site specific Flood Risk Assessment will be required for any development on this site as the site area is over 1 ha.</p> <p><u>Groundwater and Contaminated Land</u></p> <p>A number of groundwater abstractions are present in the vicinity of this site. The potential risks to these abstractions should be taken into account when deciding upon the activities to be undertaken on the site. There should be no degradation to the quality or quantity of water obtained from these abstractions as a result of the planned developments.</p> |
| | Chris H Smith Natural England | Natural England recommends that the descriptive paragraph and illustration on Page 29 be moved to Page 28, to follow the description of Site 92 on Page 27 which is co-located. This will be consistent with the layout of Sites 35 and 48. Again it is recommended that the Gypsy/traveller site is clearly marked in the illustrative site. |

| ADDITIONAL SITES | | |
|------------------|---|---|
| Rep ID | Name / Organisation | Summary of Representation |
| | Ms G Hancock Mr S Jackson Residents | 1. Spare land in front of "Federal Modal" Listerhill / Legrams Lane. 2. Old "Woolcombers" site on Thornton Road 3. Thronton Road Area – Around old site of "Imperial" Chinese restaurant. |
| | GJ Llewellyn Resident | There is a small site (1.1 acres) off Manchester Road close by the former 'Listers Arms' which has been undeveloped for many years. This site could be the nucleus for the development of a district heating scheme for the current high rise flats (or their replacement). This could utilise the waste from the 'Trident' area to provide an economic benefit whilst improving the environmental profile which seems to be 'Tridents' role now. |

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