

LOCAL DEVELOPMENT FRAMEWORK FOR BRADFORD

Waste Management DPD

Issues and Options Consultation

(Regulation 25)

STATEMENT OF CONSULTATION

JANUARY 2010

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WASTE MANAGEMENT ISSUES & OPTIONS CONSULTATION SUMMARY OF REPRESENTATIONS

1.0 INTRODUCTION

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

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



2.0 ENVIRONMENT AND WASTE MANAGEMENT IMPROVEMENT COMMITTEE

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

3.0 LETTER OF CONSULTATION

Department of Regeneration

Local Development Framework Group

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

Tel: (01274) 434050 Fax: (01274) 433767 Minicom: (01274) 392613

E-Mail: <u>Idf.consultation@bradford.gov.uk</u>

Web site: www.bradford.gov.uk/ldf
My Ref: TDP/P&P/LDF/WDPD/I&O

Your Ref:

9th November 2009

Dear Sir/Madam,

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

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

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

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

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

Waste Management Issues and Options Report

There are also several supporting documents:

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

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

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

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

Idf.consultation@bradford.gov.uk

Alternatively they can be faxed to (01274) 433767

Or sent hard copy to FREEPOST address:

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

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

Comments should be received by Monday 25th January 2010

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

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

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

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

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

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

Andrew Marshall Strategy Manager

Enc.

3.0 COMMENT FORM



FOR OFFICE	USE ONLY	
Rep No	Date Entered	Officer

City of Bradford Metropolitan District Council

www.bradford.gov.uk

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

(9th November 2009 – 25th January 2010)

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

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

Data Protection Act 1998

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

Your Details:		
Title Surname	Forenar	ne
Address		
Organisation:		
Tele No: Home	. Work	. Mobile
Fax:	Email:	

Waste Management DPD: Issues and Options Paper

Key Questions

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

Cross-Boundary Considerations		
How should BMDC work jointly with neighbouring local authorities and Actions could include: Information sharing relating to key waste data indicators, their	analysis and interpretation;	
 Collaborative working on emerging waste DPD's and their rev Commenting on waste related planning applications; and 		
The commissioning of joint reviews, data updates and specific	c waste related studies. \square	
Objectives		
To be more self-sufficient in managing our own waste throug of waste we re-use, recycle, compost and recover meeting reg		easing the amounts
 To minimise the amount of residual waste sent on to landfill s deal with our own waste within the District; 	ites within and outside Bradford District. We need to make	ke greater efforts to
To ensure that expanded and new waste developments support	ort the planned growth and waste needs of the Bradford c	ommunity; and
 To work in collaboration with neighbouring local authorities a effectively considered and planned for, recognising that each i period where this is the most suitable option. 		
2. Are there any local circumstances which would lead us to depart from	theses objectives, if so what are they and what should th	ne objectives be?
Forecast Future Waste Arisings		
Do we need to allocate sites for all categories of waste or do we just need to allocate site for MSW and C&I waste?	Are the levels of waste to be planned for within the should we be planning for different levels of waste?	If so, what level of
All Categories of Waste MSW and C&I Waste Only	waste do you see as being more appropriate / realistic?	,

	10.71
4. Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste) categories of waste?	Through the DPD the Council can include planning approaches which assist in reducing waste arisings, such as promoting the on-site reuse or recycling of waste and how waste is processed for example.
Yes No	Are there other approaches of minimising waste arisings that the Council should promote in the DPD?
Deviewel and National Bellow	Applications of Others Wester
Regional and National Policy	Agricultural and Other Waste
7. Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and re-use of waste? Yes	Should criteria based policies be considered for the provision of waste management facilities for agricultural and 'other' types of waste arising rather than site specific? Yes
No	No 🗆

ISSUES AND OPTIONS

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

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

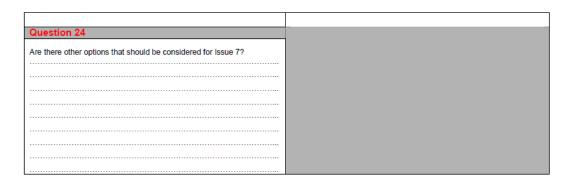
ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEN	IENT FACILITIES
Option 1	Option 2
Test all sites on the initial ling list within the area of search, excluding those in the Green Belt other than existing facilities.	Test all sites on the initial long list, including new potential sites in the Green Belt.
Question 15	
Which option is the most appropriate and Why? Are there Alternative options?	
ISSUE 4: LOCATIONAL CRITERIA FOR MUNIPICAL SO	OLID WASTE AND COMMERCIAL AND INDUSTRIAL

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

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DE	MOLITION WASTE
Option 1	Option 2
Include criteria based policies in the Waste Management DPD that require the maximisation of on-site recycling and re-use of construction and demolition waste as part of the development process to minimise waste arisings.	Include a criteria based policy for locating new and expanded construction and demolition waste management facilities.
Option 3	
Combination of Options 1 and 2.	
Question 17	Question 18
Which option do you consider the most appropriate and why?	Are there any other option that should be considered?
	l

ISSUE 6 MANAGEMENT OF 'OTHER' WASTE STREAM:	S
Option 1	Option 2
Identify potential new sites for managing hazardous waste now even though such capacity may not be required in the short term plan period	Do not identify potential new sites for managing hazardous waste as they are not required in the short term period.
Option 3	Option 4
Develop a criteria based policy approach for locating 'other' waste management facilities, including hazardous and agricultural waste.	Develop a policy approach combining either Option 1 or 2 with Option 3.
Question 19	Question 20
Which option do you consider the most appropriate for Issue 6 and why?	Is it appropriate to assume that agricultural waste will be dealt with at point of origin rather than requiring new facilities / sites to be identified?
Question 21	
Should the DPD consider any other types of waste?	

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE	
Option 1	Option 2
Through the inclusion of appropriate criteria based policies, encourage the use of alternative technologies for the treatment of residual waste through limiting landfill capacity within the District.	Provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD.
Option 3	Option 4
Provide a combination of both Options 1 and 2.	Utilise the existing sub-regional capacity in the first instance, but still provide additional landfill capacity within the District through the identification of suitable sites within the Waste Management DPD. Any identified additional landfill capacity only to be utilised when the sub-regional capacity nears exhaustion.
Question 22	Question 23
Question 22 Which option do you consider the most appropriate for Issue 7 and why?	Question 23 For Issue 7 Option 2, should additional capacity be identified in existing or new sites?
Which option do you consider the most appropriate for Issue 7 and	For Issue 7 Option 2, should additional capacity be identified in existing
Which option do you consider the most appropriate for Issue 7 and	For Issue 7 Option 2, should additional capacity be identified in existing
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Please note that representations cannot be treated as confidential and a schedule of all representations received will be published

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

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

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

4.0 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

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

5.0 SCHEDULE OF WRITTEN REPRESENTATIONS

GENE	RAL COMMENTS			
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Steve Gibbs -	The consultation refers to preferred option, for example,	Noted.	No action taken.
	The Arley	at Para 5.10. In July 2009 issue of "Plan-it Bradford", it		
	Consulting	appeared to be envisaged that two consultations would		
	Company	take place in parallel. Without knowing the content of this		
	Limited on	related document, we cannot know whether it would be		
	behalf of P	relevant to our responses to the Waste DPD Issues and		
	Casey (Enviro)	Options, for example, as discussed below in relation to		
	Ltd (PCE)	Question 22.		
		APPLICABILITY TO LANDFILL AND OTHER OPTIONS		
		PCE consider that there is some uncertainty as to		
		whether some of the Issues, Options and Questions are		
		intended to apply to landfills.		
		Para 2.9 includes landfills within the terminology "waste		
		management facilities"		
		However, Figures 14 and 15, within Issue 4 – "Locational		
		criteria" do not include landfills.		
		Issue 1 seems to be concerned primarily with the balance		
		of imports, exports and the management of wastes within		
		the district.		
		Issue 7 seems concerned with similar issues in relation to		
		landfill.		

GENE	RAL COMMENTS			
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		PCE's impression is therefore that Issue 7 is intended to		
		relate to landfill, and Issues 1-6 to other options.		
		However, para 5.45 refers to the Area of Search in the		
		preferred option. Para 5.11 seems to envisage that that is		
		in the public domain.		
		PCE is therefore unclear as to whether Issue 2 is		
		intended to apply to landfill/		
		PCE suggests that in the next stages the applicability of		
		the content, and the use of the terms "facilities" and "sites"		
		is made clear.		
	Environment	Flood Risk	Noted.	See Policy WDM2 and
	Agency	The issues and options document does not mention flood	This shall be addressed in	allocation proposal statements.
		risk, which is an important consideration in locating waste	the preferred approach.	
		management sites. Please see the following comments		
		on flood risk.		
	Environment	Sequential Test and Exception Test	Noted.	See allocation proposal
	Agency			statements.
		Any development proposed in either high risk flood zone 3		
		or medium risk flood zone 2 must pass the Sequential		
		Test and where necessary the Exception Test, as outlined		
		in Planning Policy Statement 25 (PPS25).		
		PPS25 advocates a sequential approach to siting		
		developments with preference given to those sites in low		

GENE	RAL COMMENTS			
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		risk flood zone 1 (defined as having a less than 1 in 1000		
		annual probability of river flooding in any year). Only		
		where no reasonably available alternative sites are		
		available in flood zone 1 should consideration be given to		
		locating development in medium risk flood zone 2		
		(defined as having between a 1 in 100 and 1 in 1000		
		annual probability of river flooding in any year).		
		Development should only be considered in high risk flood		
		zone 3 (defined as having a 1 in 100 year or greater		
		annual probability of river flooding in any year) where		
		there are no reasonably available alternative sites in		
		either flood zones 1 or 2. See Annex D of PPS25 for		
		further information.		
		PPS25 classifies landfill and waste management facilities		
		for hazardous waste as uses which are 'more vulnerable'		
		to flood risk. All other waste treatment sites are classified		
		as being 'less vulnerable' to flood risk.		
		When assessing potential waste management sites		
		consideration must be given to the flood risk vulnerability		
		classification PPS25 has assigned the proposed use. A		
		'more vulnerable' use proposed in high risk flood zone 3a		
		which passes the Sequential Test, must then go on to		
		pass the Exception Test (Table D.3, paragraph D9).		
		Neither 'more' or 'less' vulnerable development (i.e. any		

GENE	RAL COMMENTS			19
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		type of waste site) is permissible in flood zone 3b -		
		classed as 'functional floodplain'.		
		Site Specific Flood Risk Assessment		
		All development proposals in medium risk flood zone 2 and high risk flood zone 3 must be accompanied by an FRA which demonstrates that the development can remain safe in the event of a flood and will not increase flood risk to the site or elsewhere.		
		All development proposals over one hectare in flood zone		
		1 must also be accompanied by an FRA. In this case the		
		FRA should demonstrate that surface waters will be		
		managed to avoid increased flood risk to the site or		
		elsewhere.		
	Environment	Flood risk assessments should be carried out to the	Noted.	See allocation statements.
	Agency	appropriate degree of detail and assess the risks of all		
		forms of flooding to and from development and must take		
		climate change into account, as required by PPS25.		
		Those developments within flood zones 2 and 3 which		
		pass the Sequential Test and where necessary the		
		Exception Test, must adopt a sequential approach to site		
		layout. The site layout must aim to keep those elements		
		of the development most vulnerable to flooding in the		
		lowest flood risk areas of the site. The development		
		should also have appropriate mitigation measures to		

GENE	GENERAL COMMENTS			
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		reduce the impact of flood events.		
	Bradford Waste	Comment - Chapter 2 the waste forecasting needs to be	Noted.	See revised Forecasts for
	Disposal	revisited (MSW over estimates) some of the values in the		waste arisings in Preferred
	Authority (WDA)	table dated 2005! In 2.7 given that there is still plenty of		Approach document (Table 2)
		landfill (including active waste) in the sub region, Bradford		
		is likely to continue to export residual waste arising from		
		waste treatment activities, and thus should not be		
		criticised for such export of residual wastes into the sub		
		region.		
		Chapter 4		
		Comment - MSW values and % recycled can be updated		
		via data held by waste management (4.9, 4.10).		
	Environment	 Strengthen strategy for then than MSE 	Noted.	Further justification for
	and Waste	 Ensure Bradford MDC does take responsibility for 		management of each waste
	Management	all waste		stream is made in the
	Improvement			Preferred Approach, with a
	Committee			criteria policy based
				approach for residual,
				hazardous, agricultural and
				CDEW waste. The
				management of MSW and
				C&I waste will be through a
		*		combination of policy and
				proposed allocated sites.

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	Information sharing relating to key waste data indicators, their	Noted.	See 'Policy W2:Cross
	Millmore –	analysis and interpretation.		Boundary Work' regarding
	Minerals			sharing relevant information.
	Planning			
	Group			
	Imogen	It is considered that CBMDC should work together with	Noted.	See 'Policy W2: Cross
	Scotney -	neighbouring local authorities within West Yorkshire to find		Boundary Working'.
	Scott Wilson	joint solutions for waste management where such solutions		
	on behalf of	offer benefits in terms of proximity1, affordability and		
	Earth Tech	sustainability etc. Except in the case of specialist facilities		
	and Skanska	which are designed to manage single waste streams or		
	(ETS)	hazardous wastes for example, it should be recognised that		
		proximity and sustainability criteria are unlikely to be met if		
		such joint facilities manage waste arising from or transported		
		to location outside of the West Yorkshire sub-region.		
		Connected with this, CBMDC should consider, in preparing		
		the Waste Management DPD, that it will be relevant not		
		simply to plan to manage all of the waste arising within the		
		administrative area of Bradford but that some of Bradford's		
		waste is likely to be exported while waste from other		
		neighbouring local authorities may be imported.		

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

	waste	9?		
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		Information sharing, data updates and collaborative working on emerging DPD's and their reviews is therefore particularly important, so that CBMDC can fully appreciate, inter alia: Changing circumstances in neighbouring local authorities; and Any need to change the level of waste management facility provision in Bradford as a result of changes in the type and amount of waste imported to and exported from Bradford,		
	Highways	And thus CBMDC is able to plan accordingly. The Highways Agency sees joint working with neighbouring	Noted.	See 'Policy W2: Cross
	Agency	authorities as very important, particularly due to not only the amount of waste currently exported from the District but also the amount of waste which is currently imported. Therefore, the District also needs to work jointly with those authorities which import waste to Bradford District.	NOIGU.	Boundary Working'.
	Yorkshire Wildlife Trust	All of the above [options for question 1]. Cooperation with adjacent authorities will have many advantages and lead to more efficient waste planning.	Noted.	See 'Policy W2: Cross Boundary Working'.
	Burley Parish Council	[Supported all options for joint working]	Noted.	See 'Policy W2: Cross Boundary Working'.

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

	wasie			
Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
	Environment Agency	Cross-Boundary Considerations We agree that Bradford should work closely with neighbouring local authorities in the areas listed. We would also like to see 'sharing information and experience of new waste technology' included in the list of actions. There should be a joint approach to the management of specific waste streams in order to achieve the highest levels of resource recovery. For example, despite both waste wood and food wastes having recognised treatment technologies aimed at removing them from residual waste streams, a large percentage is still disposed of as residual waste.	Noted.	See 'Policy W2: Cross Boundary Working'.
	Bradford Wildlife Group	 Information sharing relating to key waste data indicators, their analysis and interpretation Collaborative working on emerging waste DPD's and their reviews The commissioning of joint reviews, data updates and specific waste related studies 	Noted.	See 'Policy W2: Cross Boundary Working'.
	Bradford Waste Disposal Authority (WDA)	Joint working with neighbouring councils is a 2 way process and we need to understand their views on working with us. As waste has impacts beyond the development site (traffic and emissions) consideration of neighbouring LPA's will be needed in determining waste applications, we should be open to working with neighbouring LPA's on as many levels as possible to assist in determining applications, however possible sites and policies within Bradford district are a matter for Bradford.	Noted.	See 'Policy W2: Cross Boundary Working'.
	Environment and Waste Management	 All actions should be explored with neighbouring authorities Need to learn lessons from the aborted interim waste contract Is there a contradiction between paragraphs 3.22 	Noted.	See 'Policy W2: Cross Boundary Working'.

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Improvement Committee	 and 3.23? Council should consider commissioning a comprehensive academic led review of its waste management strategies that assesses performance in relation to best practice worldwide, seeking to identify opportunities to incorporate lessons learnt. 		

OBJECTIVES

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	No Comment Made		
	Millmore –			
	Minerals			
	Planning Group			
	Imogen	If the objectives are read holistically, they are broadly	Noted.	See revised Preferred
	Scotney - Scott	supported. However, if the third point is read in isolation,		Approach Objectives.
	Wilson on	CBMDC is invited to note it is appropriate (and in		
	behalf of Earth	accordance with national guidance as stated in PPS10) to		
	Tech and	plan for an appropriate contribution to the waste needs of		
	Skanska (ETS)	the sub-region and not just the Bradford community.		
	Highways	The aim of self-sufficiency is welcomed as large amounts of	Noted.	See revised Preferred
	Agency	waste are currently being exported, primarily to Wakefield		Approach Objectives.

OBJECTIVES

	<u> </u>	ectives de?		
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		District, resulting in HGV trips on the Agency's Strategic		
		Road Network (SRN). However, it does appear that the		
		commitment to self-sufficiency is a little weaker now that it		
		was in 2007. The February 2007 Topic Paper stated that		
		the District "should look to be self sufficient" in managing		
		the waste it generates, whereas the current Issues and		
		Options document states that the District is "to be more		
		self-sufficient" in managing its own waste" and it is "to		
		minimise the amount of waste sent on the landfill sites		
		within and outside Bradford District".		
		We consider that minimising transport needs should be a		
		consideration in inter-authority discussions on sub-regional		
		waste issues to comply with the spirit of PPS10.		
		The only local circumstance which should be considered		
		which would result in a departure from these objectives is if		
		there is an existing waste handling facility in a neighbouring		
		authority which is closer to the point of source than the		
		nearest alternative particularly if that means potential HGV		
		movements on the SRN can be removed. We have not		
		seen a reference to the location proposed for the new		
		waste management facility referred to in paragraphs 3.21-		
		3.24 of the Issues and Options document.		

OBJECTIVES

Rep	Name /	Summary of Representation	Council Response	Action Required
ID .	Organisation			
	Yorkshire	No Comment Made		
	Wildlife Trust			
	English	In view of the Governments objectives regarding	Noted.	See revised Preferred
	Heritage	sustainable waste management, one might have expected		Approach Objectives.
		the objectives to have included some reference to ensuring		
		that new waste developments are provided for in a way that		
		protects human health and the environment. Consequently,		
		it is suggested that the third objective is amended to read:-		
		"To ensure that expanded and new waste		
		developments support the planned growth and		
		waste needs of Bradford and are delivered in a		
		manner which protects the District's environmental		
		assets and safeguards human health."		
	Burley Parish	No	Noted.	See revised Preferred
	Council			Approach Objectives.
	Environment	Objectives – waste as a resource	Noted.	See revised Preferred
	Agency	The objectives for waste management make sense but we would like more emphasis on waste as a resource. We would add to the list of objectives: 'To consider and plan for the use of waste as a raw material/energy source for local industry both existing and new'.		Approach Objectives.
	Bradford Wildlife Group	I believe the Bradford District is coping better than some Authorities over the collecting and to recycle more domestic waste has been achieved partially in the Bingley District (the latter being the first to provide a paper bin). The problem is supermarkets who aim to provide people with a	Noted.	See revised Preferred Approach Objectives.

OBJECTIVES

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		reusable shopping bag, but do not enforce this as a necessity.	AY	
	Bradford Waste Disposal Authority (WDA)	No Comment.		
	Environment and Waste Management Improvement Committee	 No, even if a cheaper solution could well be purchase LATS (re: waste arisings, do we just dismiss agricultural waste in our forecast?) 	Noted.	See revised forecasts in the Preferred Approach report. (Table 2).

FORECAST FUTURE WASTE ARISINGS Question 3: Do we need to allocate sites for all categories of waste or do we just need to allocate sites for MSW and C&I waste?					
Rep Name / Summary of Representation Council Response Action Requ					
ID	Organisation				
	Mr Martin	All Categories of Waste. Allocations should be made for all	Noted.	Sites are allocated for the	
	Millmore –	waste types in order to realistically plan for the future.	Due to the volumes of waste	management of MSW and	
	Minerals		arisings for Residual and	C&I within the Preferred	

28 **FORECAST FUTURE WASTE ARISINGS** Question 3: Do we need to allocate sites for all categories of waste or do we just need to allocate sites for MSW and C&I waste? **Summary of Representation** Council Response **Action Required** Rep Name / **Organisation** ID Planning Group Hazardous wastes, it does Approach report. not quantify the allocation of a site for either waste stream. Agricultural and CDEW are typically treated on site / in-situ and thus sites will not be allocated for either waste stream. Imogen It is considered that CBMDC should prioritise, above other Sites are allocated for the Noted. Scotney - Scott categories of waste, the allocation of suitable sites to deal management of MSW and with MSW and Commercial and Industrial (C&I) waste. Wilson on C&I within the Preferred behalf of Earth Approach report. Tech and Skanska (ETS) **Burley Parish** All Categories of Waste Due to the volumes of waste Sites are allocated for the Council arisings for Residual and management of MSW and Hazardous wastes, it does C&I within the Preferred Approach report. not quantify the allocation of a site for either waste Agricultural stream. and CDEW are typically treated on site / in-situ and thus sites will not be allocated for either

waste stream.

FORECAST FUTURE WASTE ARISINGS Question 3: Do we need to allocate sites for all categories of waste or do we just need to allocate sites for MSW and C&I waste? **Summary of Representation** Council Response Rep Name / **Action Required Organisation** ID Domestic waste should be cut even further than at present Sites are allocated for the Bradford Noted. Wildlife Group by the removal of plastic containers from many items in management of MSW and The Council's priority aligns C&I within the Preferred supermarkets and to reuse their food waste in the right way with the waste hierarchy to Approach report. thus reducing the necessity of more allocated sites. Education of the public and industry is the way forward. reduce, reuse, recycle. **Bradford Waste** No Noted. Sites are allocated for the Disposal management of MSW and Authority C&I within the Preferred (WDA) Approach report. Only 50% of Bradford MDC's waste is MSW and CI Environment Due to the volumes of waste Sites are allocated for the and Waste waste. We cannot dismiss the balance arisings for Residual and management of MSW and Management C&I within the Preferred Hazardous wastes, it does not quantify the allocation of Improvement Approach report. Committee a site for either waste Agricultural stream. CDEW are typically treated on site / in-situ and thus sites will not be allocated for either waste stream. Highways Please see revised forecasts It is stated in paragraph 4.4 that the growth in total waste Noted. arisings is just 4%, however, the numbers in Figure 10 within Preferred Agency the show that there is a 14% growth in waste arisings forecast. Approach. Is this a typing error in paragraph 4.4 that should read 14%?

30 FORECAST FUTURE WASTE ARISINGS Question 3: Do we need to allocate sites for all categories of waste or do we just need to allocate sites for MSW and C&I waste? **Summary of Representation Council Response** Rep Name / **Action Required** Organisation ID The need for new waste management facilities in **Bradford District** It is stated in paragraph 4.10 that existing incidences of recycling and composting in Bradford stand at around 21% of total MSW generated for 2007/08. This would equate to around 55,000 tonnes currently being recycled. It is stated that by 2021 a minimum of 158,000 tonnes of MSW is required to be recycled. Paragraph 4.10 states that infrastructure to meet the minimum need for an additional 158,000 tonnes of MSW is required. However, in the previous paragraph it states that 55,000 tonnes of waste is currently being recycled. Therefore, is there only the need for an additional 103,000 tonnes? Also the last bullet point of paragraph 4.11 states that further capacity would be needed for 357,000 tonnes of C&I waste. If, of the forecast 649,000 tonnes, 214,170 tonnes goes to land fill and recovery capacity has been estimated at 78,000 tonnes, this results in capacity for 357,000 tonnes of waste required. Is there not already capacity for C&I waste in the district? The Agency would welcome the significant improvement in re-use, recycling and composting to be delivered through

FORE	FORECAST FUTURE WASTE ARISINGS				
Question 3: Do we need to allocate sites for all categories of waste or do we just need to allocate sites for MSW and C&I waste?					
Rep	Name /	ame / Summary of Representation	Council Response	Action Required	
D	Organisation				
		the PFI and the Waste Management DPD.			
		As hazardous waste is not forecast to increase and if			
		policies are in place that require the maximisation of on-site			
		recycling and re-use of construction and demolition waste,			
		which the Highways Agency would strongly support as this			
		minimises the amount of potential HGV trips on the SRN,			
		sites will just need to be allocated for Municipal Solid Waste			
		(MSW) and Commercial & Industrial (C&I) waste.			
	Yorkshire Wildlife Trust	Just sites for MSW & C&I	Noted.	Sites are allocated for the management of MSW and C&I within the Preferred Approach report.	

Ques	Question 4: Is it sufficient to have criteria based policy in place for 'other' (all categories of waste excluding MSW and C&I waste)						
	categories of waste?						
Rep	Name /	Summary of Representation	Council Response	Action Required			
ID	Organisation						
	Mr Martin	No Comment Made					
	Millmore –						
	Minerals						
	Planning Group						
	Imogen	No Comment Made					
	Scotney - Scott	¥					
	Wilson on						

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

	categories of waste?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	behalf of Earth				
	Tech and				
	Skanska (ETS)				
	Highways	No Comment			
	Agency				
	Yorkshire	No Comment Made			
	Wildlife Trust				
	Burley Parish	Don't know			
	Council				
	Environment				
	Agency				
	Bradford	We are a "throw away" society and this should be a way of	Noted.	The principals of the waste	
	Wildlife Group	thinking which should change. Unfortunately the economy		hierarchy are embedded	
		is built upon it.		throughout the Preferred	
				Approach report.	
	Bradford Waste	Yes	Noted.	See criteria based policy	
	Disposal			approach to 'other' waste	
	Authority			stream in the Preferred	
	(WDA)			Approach report.	
	Environment	■ No – see answer to Q.3			
	and Waste				
	Management				
	Improvement				
	Committee				

FORECAST FUTURE WASTE ARISINGS

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	No Comment Made		
	Millmore –			
	Minerals			
	Planning Group			
	Burley Parish	All forecasts see an increase in waste should we not be	Noted.	See Preferred Approach
	Council	aiming to reduce targets? Why is construction / demolition		forecasts (Table 2).
		so high? Should not more recycling on site be carried out?	The forecasts have now	
			been revised within the	
			Preferred Approach report.	
			The forecasts put forward are	
			considered the most	
			accurate and realistic picture	
			of what is likely to occur.	
			Although waste will increase,	
			policies within the Preferred	
			Approach report will	
			encourage waste to be	
			managed more sustainably.	
	Highways	The forecasts of waste arisings have been taken from the	Noted.	
	Agency	Yorkshire and Humber Regional Assembly data presented		
		in the RSS (proposed changes 2007), supplemented by		
		forecasts of waste arisings obtained from research		

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

	categories of waste?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
		undertaken by Enviros Consulting Limited on behalf of			
		Government Office for Yorkshire and Humberside in 2007			
		(Waste Arisings Forecast). Analysis of the increase in			
		households in the RSS (proposed changes) shows that the			
		number of households in Bradford District is set to increase			
		by around 19% between 2007 and 2021 taking the 2007			
		figures from Tempro version 5.4. Figure 10 shows that			
		Municipal Solid Waste is set to rise by 21%. Therefore, this			
		looks like a robust forecast.			
	Yorkshire	If the message of 'reduce, re-use, recycle' is reinforced and	Noted.	Please see revised forecasts	
	Wildlife Trust	sustainable systems are being followed then net MSW		in Preferred Approach report	
		should be lower despite projected growth in population.	The waste arising's forecasts	(Table 2).	
			have now been revised in the		
			Preferred Approach report.		
	Imogen	It is appropriate that the starting point for the Waste	Noted.	Please see revised forecasts	
	Scotney - Scott	Management DPD is to plan for the projected waste		in Preferred Approach report	
	Wilson on	arisings for Bradford that are contained within the	The waste arising's forecasts	(Table 2).	
	behalf of Earth	published RSS (the Yorkshire and Humber Plan, 2008) - in	have now been revised in the		
	Tech and	absence of CBMDC having its own, potentially more	Preferred Approach report.	The Plan period has also	
	Skanska (ETS)	accurate, figures.		been changed to 2026.	
		The figures that are presented in the Issue and Options			
		consultation document are taken from the previous draft of			
		the RSS (the Secretary of State's Proposed Changes,			
		2007) and not from the final, published plan (the reason for			

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

	categoi	ries of waste?			
Rep	Name /	Summar	y of Representation	Council Response	Action Required
ID	Organisation				
		this is unclear). The fig	ures contained within the published		
		Plan are as follows (MS	SW and C&I waste arisings, tonnes		
		per annum for Bradford):		
		MSW	<u>C&I</u>		
		2010 – 279,000	2010 – 628,000		
		2015 – 296,000	2015 – 638,000		
		2021 – 318,000	2021 – 649,000		
		These figures vary slight	ntly from those contained within the		
		draft plan (the MSW	figures are slightly higher in the		
		published version). It is	these figures which it is considered		
		should be referenced v	vithin the Waste Management DPD		
		and which the CBMDC	should use as a starting point to		
		plan for waste manager	nent throughout the Plan period.		
		As mentioned above (in	n response to Question 1) it will be		
		relevant for CBMDC no	t simply to plan to manage all of the		
		waste arising within the	administrative area of Bradford but		
		to consider that some	of Bradford's waste is likely to be		
		exported while waste	e from other neighbouring local		
		authorities may be impo	orted.		
		Lastly, it is stated within	the consultation document that it is		
		intended the Waste Ma	anagement DPD will cover a period		
		of 15 years and it is	anticipated that the DPD will be		
		adopted in early 2011.	In which case, there is a gap of 5		
		years where data on	projected waste arisings is not		

ер	Name /	Summary of Representation	Council Response	Action Required
D	Organisation	Summary of Representation	Council Response	Action Required
		available (i.e. the figures in the RSS only go up to 2021,		
		where as the plan period is intended to reach up to 2026).		
		How will the waste arisings for the last five years be		
		projected? It is thought that the DPD should contain a		
		projection for waste arisings throughout the Plan period (i.e.		
		2011 to 206) and also maintain capacity sufficient (i.e. at		
		least 10 years of the annual requirement - see PPS 10		
		para.18) throughout the plan period.		

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

		es of waste?		
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Environment Agency	The approach to forecasting is reasonable. As the document states, information on construction and agricultural waste is not so reliable and is also dependent on economic activity. We will keep you informed as new data becomes available.	Noted.	
	Bradford Wildlife Group	These are realistic. As a society we are producing more waste than is necessary. The education of the public, industry and the farming communities should be as essential plan forward. There is nothing in the Document concerning the education of the public.	Noted. In regards to education of the public, this will be covered by the Council's corporate waste management strategy, rather than the Waste Management DPD which will only cover planning related waste issues.	
	Bradford Waste Disposal Authority (WDA)	Concern over levels of waste predictions, this forecasting needs to be remodelled using more up to date values. It may be helpful to understand how other LPA's are forecasting waste growth.	Noted. The waste arising's forecasts have now been revised in the Preferred Approach report.	Please see revised forecasts in Preferred Approach report (Table 2).
	Environment and Waste Management Improvement Committee	 Flexibility needs to be incorporated within DPD to accommodate change in levels of waste i.e. effect of more recycling, more regeneration. 	Noted.	See revision to forecasts in Preferred Approach report (Table 2).

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	Co-Mingling collections and recycling.	Noted.	
	Millmore –			
	Minerals			
	Planning Group			
	Imogen	CBMDC should encourage education initiatives which are	Noted.	
	Scotney - Scott	aimed at improving public understanding of waste and		
	Wilson on	resource management generally and which promote waste	In regards to education of the	
	behalf of Earth	minimisation, reuse and recycling.	public, this will be covered by	
	Tech and	Although most of the means by which this objective can be	the Council's corporate	
	Skanska (ETS)	achieved fall outside the influence of the planning system,	waste management strategy,	
		visitor/education centres for example can be provided	rather than the Waste	
		alongside large scale waste recycling, recovery and	Management DPD which will	
		treatment facilities, allowing the public access to appreciate	only cover planning related	
		and support sustainable forms of waste management.	waste issues.	
	Highways	The Highways Agency would support any planning	Noted.	
	Agency	approaches which assist in reducing waste arising. It is		
		suggested that as C&I waste represents a large proportion	In regards to education of the	
		(38%) of the total waste arisings in Bradford, the Council	public, this will be covered by	

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		should consider encouraging small and medium sized enterprises in the application of waste minimisation processes and set an example by setting targets for inhouse waste minimisation and recovery. A public information programme for environmental issues in general and waste management in particular. The Council could also set realistic disposal charges will be imposed which further waste minimisation objectives.	the Council's corporate waste management strategy, rather than the Waste Management DPD which will only cover planning related waste issues.	
	Yorkshire Wildlife Trust	 Education Clear messaging Community training/workshops Directory/signposting of alternative waste disposal i.e. second hand furniture stores, local recycling centres (Orinoco, Oxford for e.g.), homeless shelters, composting schemes. Charity run businesses adjacent to waste disposal sites where material which could be taken out of the waste stream is sold. There are a number of successful operations and apparently there is one at Kings Lynn. 	In regards to education, messaging and training of the public, this will be covered by the Council's corporate waste management strategy, rather than the Waste Management DPD which will only cover planning related waste issues.	
	English Heritage	Given the proportion of waste that comes from construction and demolition, the LDF, as a whole, should seek, in the	Noted. This approach to the	See Policy W6 of the Preferred Approach report.

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		first instance, to encourage the reuse and refurbishment of existing buildings. Only where this is clearly shown not to be feasible or to be the most sustainable option, would buildings be allowed to be demolished and the site redeveloped. Where demolition is allowed, provision should be made to reuse the materials wherever possible.	management of CDEW will be taken into the Preferred Approach.	
	Burley Parish Council	Reduction in packaging and encourage this at the national legislative level. Promote recycling e.g. cheap composting bins.	Noted. These issues shall be covered by the Council corporate waste management strategy rather than the Waste Management DPD.	
	Environment Agency	The council could promote sustainable construction through a Supplementary Planning Document. This document could flag the need for Site Waste Management Plans and good building design so as to encourage and facilitate waste segregation.	Noted. The Core Strategy will cover areas of sustainable construction methods. The Council will also explore how this can be incorporated into the Preferred Approach report.	See Policy WDM4 of the Preferred Approach report.
	Bradford	As mentioned above to try and educate and encourage	Noted.	

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Wildlife Group	private companies etc to cut down their waste individually and industry.	In regards to education, messaging and training of the public, this will be covered by the Council's corporate waste management strategy, rather than the Waste Management DPD which will only cover planning related waste issues.	
	Bradford Waste Disposal Authority (WDA)	Over the full spectrum of planning development, waste prevention, re use, recycling needs to be considered as part of proposed development.	Noted. The Waste Hierarchy is incorporated throughout the Waste Management DPD and is a material consideration in proposed development.	
	Environment and Waste Management Improvement Committee	Yes. Dialogue with industry bodies (building / construction and highways / other councils.	The Council will continue to engage with industry bodies through the course of plan production.	

REGIONAL AND NATIONAL POLICY

Question 7: Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and reuse of waste?

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	There needs to be flexibility in Bradford's attitude towards	Noted.	The use of mineral extraction
	Millmore –	development of recycling facilities within worked out		sites for waste management
	Minerals	quarries albeit that they are often located in the Green Belt.	The use of mineral extraction	facilities is considered for a
	Planning Group		sites (quarries) for waste	range of waste types in the
			management shall be	Preferred Approach report.
			considered in the production	For all waste types, the use
			of the Preferred Approach	of mineral extraction sites is
			report.	included within the sequential
				assessment for preferential
				sites.
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			

REGIONAL AND NATIONAL POLICY

Question 7: Are there any local circumstances that would lead us to differ from the national and regional policy aspiration to maximise the recycling and reuse of waste?

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Highways	The Highways Agency would always support the national	Noted.	The Preferred Approach
	Agency	and regional policy aspiration to maximise the recycling and		report encourages the
		re-use of construction and demolition waste. It would not	The maximisation of the re-	management of CDEW in-situ
		encourage a departure from this policy aspiration as this	use and recycling of CDEW	/ on site.
		could result in additional HGV movements on the SRN.	shall be investigated further	
			in the Preferred Approach	
			report.	
	Yorkshire	No Comment Made		
	Wildlife Trust			
	Burley Parish	No	Noted.	
	Council			
	Bradford	No	Noted/	
	Wildlife Group			
	Bradford Waste	No	Noted/	
	Disposal			
	Authority			
	(WDA)			
	Environment	No – firm commitment to national and regional policy	Noted.	
	and Waste			
	Management			
	Improvement			
	Committee			

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	No Comment Made		
	Millmore –			
	Minerals			
	Planning Group			
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			
	Highways	No Comment		
	Agency			
	Yorkshire	Agricultural waste is frequently valuable for the production	Noted.	
	Wildlife Trust	of methane		
	Burley Parish	Yes	Noted.	
	Council			
	Bradford	No Comment Made		
	Wildlife Group			
	Bradford Waste	Yes	Noted/	
	Disposal			
	Authority			
	(WDA)			

Question 8: Should criteria based policies be considered for the provision of waste management facilities for agricultural and 'other' types of waste arising rather than site specific?

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Environment	Most definitely	Noted.	
	and Waste			
	Management			
	Improvement			
	Committee			

ISSUE 1: INTERNAL WASTE MANAGEMENT

Question 9: Which option or combination of options for Issue 1 are the most appropriate and why?

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin Millmore – Minerals Planning Group	No Comment Made		
	Bradford Waste Disposal Authority (WDA)	Issue 1 Accepting that Bradford has to become more self sufficient in waste provision, and also plan for the future, it must first aspire to option 5, after this option 1 and 2 will be needed. Option 3 may be of interest only if there are sound environmental, economic and employment benefits in dealing with waste imports.	Noted. The preferred policy approach will be a combination of Options 2, 3 and 4 in order to reflect consultation and SA findings and the need to ensure that the Waste DPD has sufficient flexibility and adaptability to respond to future circumstances and approaches to waste management.	See Policy W4 of the Preferred Approach.

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Environment	No Comment Made		
	and Waste			
	Management			
	Improvement			
	Committee			
	Imogen	It is thought that a combination of options one, two and	The preferred policy	See Policy W4 of the
	Scotney - Scott	three is preferable.	approach will be a	Preferred Approach.
	Wilson on	Firstly, there is a need to safeguard existing waste	combination of Options 2, 3	
	behalf of Earth	management facilities that will continue to contribute	and 4 in order to reflect	
	Tech and	significantly to waste management infrastructure in	consultation and SA findings	
	Skanska (ETS)	Bradford in the future. The inclusion of such facilities/sites	and the need to ensure that	
		within the Waste Management DPD should be conditional	the Waste DPD has sufficient	
		on the sites being appropriate in planning terms - i.e. in	flexibility and adaptability to	
		close proximity to urban areas, within 1km of the strategic	respond to future	
		highway network and not subject to significant	circumstances and	
		environmental constraints (e.g. within the Green Belt or	approaches to waste	
		adjacent to a SSSI, etc).CBMDC should, in the first	management.	
		instance, seek to utilise the potential for developing existing		
		waste management facilities and opportunities to develop		
		these sites (e.g. to increase operational efficiency and/or to		
		maximise opportunities for recycling and recovery of waste)		
		should be supported. This has a number of benefits, such		
		as:		

types of waste arising ratner than site specific?					
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
		 Established waste management use (in planning 			
		terms);			
		 Established highway infrastructure and routing 			
		vehicles;			
		 Established facility for customers; 			
		 Local acceptance of the site for waste management 			
		use; and			
		 Sustainable use of existing assets. 			
		The document does not currently include provision for			
		safeguarding (and, potentially, development) of suitable			
		existing waste management sites but it is understood, from			
		attendance at the Stakeholder Event held in Bradford on 8 th			
		December 2009, that it is intended the Waste Management			
		DPD will do so.			
		It is recognised that, in addition to developing/expanding			
		existing facilities where possible (and appropriate in			
		planning terms), there will be a need to allocate new sites			
		for development in order to manage the waste arisings			
		within Bradford and also (
	Highways	The Highways Agency feels that in order to reduce the	The preferred policy	See Policy W4 of the	
	Agency	number of HGV movements on the SRN, Option 5, to	approach will be a	Preferred Approach.	

	types of waste arising rather than site specific?					
Rep	Name /	Summary of Representation	Council Response	Action Required		
D	Organisation					
		minimise waste production/arisings across the District	combination of Options 2, 3			
		through appropriate planning policies, therefore, minimising	and 4 in order to reflect			
		the site allocations required is important. However, there	consultation and SA findings			
		will still be a need to increase waste disposal within the	and the need to ensure that			
		District, particularly as currently a large proportion of waste	the Waste DPD has sufficient			
		is exported to other districts. All moves towards self-	flexibility and adaptability to			
		sufficiency will be welcomed and therefore the Agency	respond to future			
		would prefer Option 2 - providing additional sites and	circumstances and			
		capacity to manage growing waste arisings in the District	approaches to waste			
		over Option 1. The Highways Agency does recognise that	management.			
		some waste will need to be transported across LPA				
		boundaries to sub- regional facilities. However, there is the				
		risk that there would be some impact on the SRN and				
		therefore the Agency would only encourage Option4				
		(working with adjacent authorities to identify appropriate				
		sites) in order to identify sites in neighbouring authorities				
		which are closer to the source if it had no impact on the				
		SRN.				
		In general, the Agency would not support Option 3				
		providing additional sites and capacity to manage more				
		waste than is produced in the District, allowing scope to				
		import and handle waste from other places in the future as				

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			4
	3	this could result in additional HGV trips on the SRN. The		
		Agency would only have no objection if it would benefit a		
		neighbouring authority without producing additional trips on		
		the SRN.		
	Yorkshire	Options 4&5 offer the most sensible and sustainable	The preferred policy	See Policy W4 of the
	Wildlife Trust	solutions. Minimising waste should always be the main	approach will be a	Preferred Approach.
		priority but where this has not been possible facilities	combination of Options 2, 3	
		should be located close to their source to reduce their	and 4 in order to reflect	
		carbon footprint.	consultation and SA findings	
			and the need to ensure that	
			the Waste DPD has sufficient	
			flexibility and adaptability to	
			respond to future	
			circumstances and	
			approaches to waste	
			management.	
	Burley Parish	Option 4 and 5	The preferred policy	See Policy W4 of the
	Council		approach will be a	Preferred Approach.
			combination of Options 2, 3	
			and 4 in order to reflect	
			consultation and SA findings	
			and the need to ensure that	
			the Waste DPD has sufficient	

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation	·	•	•
			flexibility and adaptability to	
			respond to future	
			circumstances and	
			approaches to waste	
			management.	
	Environment	We support Bradford's commitment to take responsibility for	The preferred policy	See Policy W4 of the
	Agency	its own waste by providing facilities within the district but	approach will be a	Preferred Approach.
		would ask that development of waste capacity (both public	combination of Options 2, 3	
		and private) in other districts is kept in view so as to	and 4 in order to reflect	
		achieve the most sustainable solution.	consultation and SA findings	
			and the need to ensure that	
			the Waste DPD has sufficient	
			flexibility and adaptability to	
			respond to future	
			circumstances and	
			approaches to waste	
			management.	
	Bradford	Option 1 and option 5 because there is not enough room in	The preferred policy	See Policy W4 of the
	Wildlife Group	the District for additional sites and having to accommodate	approach will be a	Preferred Approach.
		waste closely to the source could damage the environment.	combination of Options 2, 3	
			and 4 in order to reflect	
			consultation and SA findings	
			and the need to ensure that	

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
			the Waste DPD has sufficient	
			flexibility and adaptability to	
			respond to future	
			circumstances and	
			approaches to waste	
			management.	

Ques	Question 10: Assuming Options 2 and / or 3 are preferential, what type of facilities should be provided?					
Rep	Name /	Summary of Representation	Council Response	Action Required		
ID	Organisation					
	Mr Martin	No Comments Made				
	Millmore –					
	Minerals					
	Planning Group					

Ques	tion 10: Assumir	ng Options 2 and / or 3 are preferential, what type of facilit	ies should be provided?	52
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Imogen	It is thought that CBMDC should prioritise the development	Noted.	See Policy W4 of the
	Scotney - Scott	of large recycling, recovery and treatment facilities,		Preferred Approach.
	Wilson on	preferably with a range of facilities co-located on one site,	The preferred policy	
	behalf of Earth	in close proximity to urban areas and within 1km of the	approach will identify a range	
	Tech and	strategic highway network.	of suitable waste	
	Skanska (ETS)	All of the above will help to ensure that the Council move	management sites capable of	
		towards more sustainable waste management solutions,	accommodating Bradford's	
		with fewer waste miles travelled and movement of a	MSW and C&I waste arisings	
		significant proportion of Bradford's waste higher up the	with a further contingency	
		waste hierarchy.	allowance to ensure that the	
			District can contribute to	
			meeting wider sub-regional	
			waste management needs	
			where appropriate and to	
			ensure flexibility in supply	
			over the plan period.	
	Highways	No Comment		
	Agency			
	Yorkshire	N/A		
	Wildlife Trust			
	Burley Parish	No Comment Made		
	Council			
	Bradford	No Comment Made		
	Wildlife Group			

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Bradford Waste	We should not try to limit technology choice but seek to	Noted.	See Policy W4 of the
	Disposal	embrace all of those technologies previously described.		Preferred Approach.
	Authority		The preferred policy	
	(WDA)		approach will identify a range	
			of suitable waste	
			management sites capable of	
			accommodating Bradford's	
			MSW and C&I waste arisings	
			with a further contingency	
			allowance to ensure that the	
			District can contribute to	
			meeting wider sub-regional	
			waste management needs	
			where appropriate and to	
			ensure flexibility in supply	
			over the plan period.	
	1			

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Environment	Depends on the outcome of the PFI contract - however,	Noted.	See Policy W4 of the
	and Waste	Council may want to consider options that are linked to but		Preferred Approach.
	Management	not necessarily part of the eventual contract such as CHP.	The preferred policy	
	Improvement		approach will identify a range	
	Committee		of suitable waste	
			management sites capable of	
			accommodating Bradford's	
			MSW and C&I waste arisings	
			with a further contingency	
			allowance to ensure that the	
			District can contribute to	
			meeting wider sub-regional	
			waste management needs	
			where appropriate and to	
			ensure flexibility in supply	
			over the plan period.	

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	No Comment Made		
	Millmore –			
	Minerals			
	Planning Group			
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			
	Highways	The Highways Agency believes that all of the options have	Noted.	See Policy W4 of the
	Agency	been considered and that it is a combination of options		Preferred Approach.
		which is required as discussed in our response to Question	See response to Q9.	
		9.		
	Yorkshire Wild	Increase recycling capacity or look to neighbouring LAs to	Noted.	See Policy W4 of the
	Trust	accommodate increased recycling.		Preferred Approach.
			See response to Q9.	
	Burley Parish	No Comment Made		
	Council			
	Bradford	Simply increase capacity at existing sites and expect to	Noted.	See Policy W4 of the
	Wildlife Group	send some waste to be managed outside Bradford.		Preferred Approach.
			See response to Q9.	

Ques	tion 11: What otl	her options should be considered?		
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Bradford Waste	Waste minimisation policies	Noted.	See Policy W4 of the
	Disposal			Preferred Approach.
	Authority		See response to Q9.	
	(WDA)			
	Environment	Energy from waste facilities not dismissed, subject to	Noted.	See Policy W4 of the
	and Waste	stringent environmental protection and with guarantees that		Preferred Approach.
	Management	recycling will be maximised rather than made subordinate	See response to Q9.	
	Improvement	to some extent to an Energy from Waste contract.		
	Committee			

appropriate sites, rather than

numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the

operators on the

waste

market.

57 **ISSUE 2: LOCATION OF WASTE SITES** Question 12: Which option for Issue 2 is the most appropriate and why? **Summary of Representation** Council Response **Action Required** Rep Name / Organisation ID Mr Martin No Comments Made Millmore -Minerals Planning Group It is considered that the most appropriate option for Policy W5 the Imogen Noted. See of Scotney - Scott Preferred Approach. CBMDC, with regard to the management of MSW and C&I Wilson on waste is to concentrate the development of waste The preferred policy approach to the location of behalf of Earth management facilities (including residual waste treatment) Tech and in a small number of sites, strategically and appropriately potential waste sites for Skanska (ETS) located. MSW and C&I combine both It is likely that large scale, strategic waste treatment Options 1 and 2, but the sites facility(s) should be supported by a range of other, smaller will be restricted to 1ha, or facilities (e.g. in the case of MSW this could include Bring to ensure that above.

Sites, Household Recycling Facilities and Transfer

Stations).

ISSU	ISSUE 2: LOCATION OF WASTE SITES						
Ques	tion 12: Which o	option for Issue 2 is the most appropriate and why?					
Rep	Name /	Summary of Representation	Council Response	Action Required			
ID	Organisation						
	Highways	The Agency would be happy to comment on the long list of	Noted.	See Policy W5 of the			
	Agency	sites at the appropriate time - we note that, in the		Preferred Approach.			
		Methodology Statement, that this list has been reduced to	The preferred policy				
		65 sites. When would be the appropriate time to comment	approach to the location of				
		on these sites?	potential waste sites for				
		The Highways Agency would prefer Option 2 as this would	MSW and C&I combine both				
		reduce the need to travel and hence potential HGV trips on	Options 1 and 2, but the sites				
		the SRN.	will be restricted to 1ha, or				
			above, to ensure that				
			appropriate sites, rather than				
			numerous sites are identified.				
			There will be the potential to				
			accommodate a combination				
			of waste technologies and				
			offer sufficient choice to the				
			waste operators on the				
			market.				
			A long list of sites will be				
			published alongside the				
			Preferred Approach within				
			the Site Assessment Report.				
	l			I			

59 **ISSUE 2: LOCATION OF WASTE SITES** Question 12: Which option for Issue 2 is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID A combination of Options 1 and 2. Smaller local sites are Policy W5 of Yorkshire Noted. Preferred Approach. Wildlife Trust more sustainable and will be easier to decommission should less sites be needed in the future. Larger sites may The preferred policy be more appropriate for some types of infrastructure. approach to the location of potential waste sites for MSW and C&I combine both Options 1 and 2, but the sites will be restricted to 1ha, or above, to ensure that appropriate sites, rather than numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the waste operators on the market.

60 **ISSUE 2: LOCATION OF WASTE SITES** Question 12: Which option for Issue 2 is the most appropriate and why? Council Response Name / **Summary of Representation Action Required** Rep Organisation ID **Burley Parish** Option 2 Policy W5 of the Noted. Council Preferred Approach. preferred policy The approach to the location of potential waste sites for MSW and C&I combine both Options 1 and 2, but the sites will be restricted to 1ha, or above, to ensure that appropriate sites, rather than numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the

waste operators on the

61 **ISSUE 2: LOCATION OF WASTE SITES** Question 12: Which option for Issue 2 is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID Policy W5 of Environment The chosen solution must be the one that extracts the most Noted. value from waste and is also flexible enough to Preferred Approach. Agency accommodate advances in technology and changes in The preferred policy waste composition. approach to the location of potential waste sites for MSW and C&I combine both Options 1 and 2, but the sites will be restricted to 1ha, or above, to ensure that appropriate sites, rather than numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the waste operators on the

62 **ISSUE 2: LOCATION OF WASTE SITES** Question 12: Which option for Issue 2 is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID [Option 1 ticked] Policy W5 of Bradford Noted. Wildlife Group Preferred Approach. Concentration of a small number of sites is more environmentally acceptable. We do not have the room for a The preferred policy large number. approach to the location of potential waste sites for MSW and C&I combine both Options 1 and 2, but the sites will be restricted to 1ha, or above, to ensure that appropriate sites, rather than numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the waste operators on the

ISSUE 2: LOCATION OF WASTE SITES Question 12: Which option for Issue 2 is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID **Bradford Waste** Policy W5 of Issue 2 Noted. Site sizes/ capacity can vary from 0.5h to 10.0h easily, so Disposal Preferred Approach. providing for only a small number of strategic (large) sites Authority The preferred policy seems inappropriate, can compromise to some extent on (WDA) approach to the location of proximity principles and desires to concentrate traffic and potential waste sites for potential polluting activities, thus selecting option 2 but MSW and C&I combine both including also larger strategic sites seems more realistic Options 1 and 2, but the sites approach to cater for the differing waste streams. will be restricted to 1ha, or to ensure that above, appropriate sites, rather than numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the waste operators on the market.

64 **ISSUE 2: LOCATION OF WASTE SITES** Question 12: Which option for Issue 2 is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID Option 1 Policy W5 of Environment Noted. more environmentally friendly Preferred Approach. and Waste least public resistance Management existing facilities The preferred policy Improvement approach to the location of Additional comment: environmental benefits depend to come extent on transportation issues (few sites mean more Committee potential waste sites for transport?) ad the nature of the facility (very localised CHP MSW and C&I combine both plants may not be feasible, but other waste sorting centre Options 1 and 2, but the sites might be). will be restricted to 1ha, or to ensure that above, appropriate sites, rather than numerous sites are identified. There will be the potential to accommodate a combination of waste technologies and offer sufficient choice to the waste operators on the

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
	Mr Martin	Yes – Green Waste recycling for instance should occur	Noted.	See Policy W5 of the
	Millmore –	away from residential / industrial areas – it is best placed in		Preferred Approach.
	Minerals	the countryside which is likely to be in the Green Belt.	The Preferred Approach will	
	Planning Group		state the need to treat	
			different waste streams in	
			individual ways using the	
			drivers of their particular	
			requirements and location	
			preferences relevant to the	
			individual types of waste	
			facility.	
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			
	Yorkshire	No Comment Made		
	Wildlife Trust			

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
	Burley Parish	Yes there may be economics of scale for some streams.	Noted.	See Policy W5 of the
	Council			Preferred Approach.
			The Preferred Approach will	
			state the need to treat	
			different waste streams in	
			individual ways using the	
			drivers of their particular	
			requirements and location	
			preferences relevant to the	
			individual types of waste	
			facility.	
	Bradford	I think these have to be in certain cases.		
	Wildlife Group			
	Bradford Waste	Probably yes, as MSW treatment will require larger capacity	Noted.	See Policy W5 of the
	Disposal	facilities strategically sited.		Preferred Approach.
	Authority		The Preferred Approach will	
	(WDA)		state the need to treat	
			different waste streams in	
			individual ways using the	
			drivers of their particular	
			requirements and location	
			preferences relevant to the	
			individual types of waste	
			facility.	

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
	Environment	Yes, depending on Q.12	Noted.	See Policy W5 of the
	and Waste			Preferred Approach.
	Management		The Preferred Approach will	
	Improvement		state the need to treat	
	Committee		different waste streams in	
			individual ways using the	
			drivers of their particular	
			requirements and location	
			preferences relevant to the	
			individual types of waste	
			facility.	

ISSU	ISSUE 2: LOCATION OF WASTE SITES						
Ques	Question 14: Are there any other options that should be considered for Issue 2?						
Rep	Rep Name / Summary of Representation Council Response Action Required						
ID	Organisation						
	Mr Martin	Yes – Best solution is probably a combination of 1 + 2.	Noted.	See Policy W5 of the			
	Millmore –			Preferred Approach.			
	Minerals		See response to Q12.				
	Planning Group						

ISSUE 2: LOCATION OF WASTE SITES

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation	,		100000000
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			
	Highways	No Comment Made		
	Agency			
	Yorkshire	Some mineral extraction sites may have very high potential	Noted.	See Policy W5 of the
	Wildlife Trust	for restoration to increase biodiversity and connectivity of		Preferred Approach.
		habitat. To use such sites for landfill would be contrary to	See response to Q12 / Q13.	
		PPS9.		
	Burley Parish	No Comment Made		
	Council			
	Environment	The chosen solution must be the one that extracts the most	Noted.	See Policy W5 of the
	Agency	value from waste and is also flexible enough to		Preferred Approach.
		accommodate advances in technology and changes in	See response to Q12 / Q13.	
		waste composition.		
	Bradford	No Comment Made		
	Wildlife Group			
	Bradford Waste	To combine both options.	Noted.	See Policy W5 of the
	Disposal			Preferred Approach.
	Authority		See response to Q12 / Q13.	
	(WDA)			

	03						
ISSU	ISSUE 2: LOCATION OF WASTE SITES						
Ques	Question 14: Are there any other options that should be considered for Issue 2?						
Rep	tep Name / Summary of Representation Council Response Action Requir						
ID	Organisation						
	Environment	Perhaps – for chemical / hazardous waste	Noted.	See Policy W5 of the			
	and Waste			Preferred Approach.			
	Management		See response to Q12 / Q13.				
	Improvement						
	Committee						

ISSU	ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES					
Ques	Question 15: Which option is the most appropriate and why?					
Rep	Name /	Summary of Representation	Council Response	Action Required		
ID	Organisation					

70 ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation** Council Response **Action Required** Rep Name / Organisation ID Must follow option 2 or opportunities to utilise worked out The Council's preferred See Policy W6 of the Mr Martin Preferred Approach and Millmore minerals sites will be lost or restricted mineral sites can only policy approach will adopt have been approved if they have no unacceptable impacts Option 2 both on the basis of Accompanying Site Minerals Planning Group and thus are often well-suited for the establishment of the findings of consultation Assessment Report. and SA but also on the basis waste management facilities. of ensuring effective, proactive and robust evidence underpins the identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW

and C&I waste.

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation** Council Response **Action Required** Rep Name / Organisation ID All sites (excluding those within the Green Belt and those The Council's preferred See Policy W6 of the Imogen Preferred Approach and Scotney - Scott which do not meet the minimum site size of 0.5 ha) should policy approach will adopt Option 2 both on the basis of Wilson on be tested. Accompanying Site behalf of Earth ETS supports CBMDC's approach, which is not to include the findings of consultation Assessment Report. Tech and any sites within the Green Belt unless an insufficient and SA but also on the basis Skanska (ETS) number of sites are identified as suitable in the area of of ensuring effective, search not within the Green Belt (this reflects national proactive and robust planning guidance and to adopt an alternative approach evidence underpins the would be unsound). identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW and C&I waste.

	SSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES				
Ques	stion 15: Which o	option is the most appropriate and why?			
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	Highways	The Highways Agency prefers Option 1, that sites in the	The Council's preferred	See Policy W6 of the	
	Agency	Green Belt should not be considered. However, if a site	policy approach will adopt	Preferred Approach and	
		outside the Green Belt would result in a significant number	Option 2 both on the basis of	Accompanying Site	
		of HGV movements on the SRN, then alternative sites	the findings of consultation	Assessment Report.	
		within the Green Belt should be considered.	and SA but also on the basis		
			of ensuring effective,		
			proactive and robust		
			evidence underpins the		
			identification and selection of		
			Waste Management sites. All		
			sites on the pre-eligibility list		
			will be taken into account. All		
			will be considered with the		
			Green Belt designation		
			applied as an additional site		
			assessment filter following		
			the assessment of all sites.		
			This is to ensure an objective		
			and robust site assessment		
			process is capable of being		
			undertaken to select the		
			most appropriate waste		
			management sites for MSW		
			and C&I waste.		

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / **Organisation** ID There does not appear to be a criteria in the list of factors The Council's preferred See Policy W6 of the Yorkshire Preferred Approach and Wildlife Trust considered in para 5.10 to take account of biodiversity or policy approach will adopt Option 2 both on the basis of the potential to enhance sites and increase habitat Accompanying Site connectivity. A further option would be to exclude sites the findings of consultation Assessment Report. which if used would have a negative effect on biodiversity. and SA but also on the basis Some brownfield sites in urban areas may be very of ensuring effective, biodiverse and valuable for wildlife and some sites in the proactive and robust green belt may not be so valuable. evidence underpins the identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW and C&I waste.

74 ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID **Burley Parish** Option 1. Option 2 if for very good reasons the first is not The Council's preferred See Policy W6 of the possible. Sites should be near where waste is generated. Preferred Approach and Council policy approach will adopt Option 2 both on the basis of Accompanying Site the findings of consultation Assessment Report. and SA but also on the basis of ensuring effective, proactive and robust evidence underpins the identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW

and C&I waste.

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID Option 1. We do not agree with new potential sites in the The Council's preferred See Policy W6 of the Bradford Wildlife Group green belt. Development cannot take place within the green Preferred Approach and policy approach will adopt belt, so why should waste facilities be allocated. Many Option 2 both on the basis of Accompanying Site wildlife areas and sites of ecological importance are the findings of consultation Assessment Report. situated in the green belt. and SA but also on the basis of ensuring effective, proactive and robust evidence underpins the identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW and C&I waste.

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID **Bradford Waste** The Council's preferred See Policy W6 of the Issue 3 Disposal Would opt for option 2, to include very limited green belt to Preferred Approach and policy approach will adopt Authority within say 1km of primary road network for limited waste Option 2 both on the basis of Accompanying Site (WDA) management options (note comment in methodology the findings of consultation Assessment Report. and SA but also on the basis statement 2.7), yet fully accepting the need for all other of ensuring effective, constraints also. proactive and robust evidence underpins the identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW and C&I waste.

ISSUE 3: IDENTIFYING SITES FOR WASTE MANAGEMENT FACILITIES Question 15: Which option is the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID Option 1 – no green belt unless part of existing facility The Council's preferred See Policy W6 of the Environment policy approach will adopt Preferred Approach and and Waste Management Option 2 both on the basis of Accompanying Site Improvement the findings of consultation Assessment Report. and SA but also on the basis Committee of ensuring effective, proactive and robust evidence underpins the identification and selection of Waste Management sites. All sites on the pre-eligibility list will be taken into account. All will be considered with the Green Belt designation applied as an additional site assessment filter following the assessment of all sites. This is to ensure an objective and robust site assessment process is capable of being undertaken to select the most appropriate waste management sites for MSW and C&I waste.

Preferred Approach.

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT **FACILTIES** Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required? Council Response Rep Name / **Summary of Representation Action Required** Organisation ID Mr Martin No Comments Made Millmore -Minerals Planning Group See Policy W6 of the Environment Yes (with some qualification, energy from waste not Noted and Waste necessarily the first resort for waste management) Preferred Approach. The Council will take forward Management Option 1 as the preferred Improvement Committee approach but with simplified and revised approach to site assessment criteria and the use of a preeligibility site identification process to discount those sites where development for MSW C&I or waste management facilities would contravene national planning policy. With regard to Figure 14 (Site Location Impact Criteria), it is See Policy W6 of the Imogen Noted

considered there are flaws with the approach taken. The

Scotney - Scott

79 ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT **FACILTIES** Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Wilson on	minimum site size values given for most of the facilities	The Council will take forward	
	behalf of Earth	generally appear reasonable. However, the value given for	Option 1 as the preferred	
	Tech and	in-vessel composting and anaerobic digestion is not	approach but with a	
	Skanska (ETS)	particularly helpful (<2.5 ha) as it can be interpreted as a	simplified and revised	
		minimum site size of anywhere between 0 and 2.5 ha is	approach to site assessment	
		required for these two technology types. The remainder of	criteria and the use of a	
		the assessment criteria (i.e. 'creates air/noise/water	preeligibility site identification	
		pollution, etc.) are thought to be flawed, since arguably	process to discount those	
		any/every waste management facility has the potential to	sites where development for	
		give rise to impacts on the environment (depending on the	MSW or C&I waste	
		specifics of the scheme and the site itself). Furthermore, no	management facilities would	
		modern waste management facility, permitted by the	contravene national planning	
		Environment Agency, will be designed without effective	policy.	
		pollution control/abatement technology. Lastly, surely it is		
		preferable that all waste management facilities are		
		developed in proximity to waste arisings (for sustainability		
		reasons) and proximity to other facilities is, similarly,		
		beneficial in all cases where there are process		
		outputs/residues that need further management.		
		It is not considered that this approach (i.e. trying to identify		
		the impacts of different technology types in order to identify		
		suitable/unsuitable sites for each specific type of		
		technology) is necessarily the best. An alternative approach		

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT **FACILTIES**

Ques	stion 16: Are the	se the right criteria and weighting? If not, then please say v	vhy. Are there any additional o	criteria required?
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		would simply be to assess the long list of sites in terms of		
		key criteria, e.g.:		
		Proximity to urban areas;		
		 Proximity to strategic highway network; 		
		Physical constraints;		
		 Environmental constraints, etc. 		
		Sites which have been assessed and do not meet the		
		criteria can then be discounted and sites which do not meet		
		the criteria can be put forward together with a note advising		
		on the likely types of technology (broadly speaking) which		
		would be suitable for development on a particular site (e.g.		
		sites of .2.5 ha are likely to be suitable for a full range of		
		technologies; sites with a particular constraint (e.g.		
		residential properties with 250m) may be unsuitable for		
		[say] windrow composting).		
	Highways	The Methodology Statement states that only the short	Noted	See Policy W6 of the
	Agency	listed sites will be tested against the locational criteria		Preferred Approach.
		not the long list as stated in Issue 4 Option 1. Will it be	The Council will take forward	
		the long list of sites or the short list of sites which are	Option 1 as the preferred	
			approach but with a	

81 ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT **FACILTIES** Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		tested against the locational criteria?	simplified and revised	
		One additional criterion should be impact on the SRN as a	approach to site assessment	
		facility may be close to the waste arisings but still have	criteria and the use of a	
		impact on the SRN.	preeligibility site identification	
			process to discount those	
			sites where development for	
			MSW or C&I waste	
			management facilities would	
			contravene national planning	
			policy.	
	Yorkshire	See above, answer to question 15.	Noted	See Policy W6 of the
	Wildlife Trust			Preferred Approach.
			The Council will take forward	
			Option 1 as the preferred	
			approach but with a	
			simplified and revised	
			approach to site assessment	
			criteria and the use of a	
			preeligibility site identification	
			process to discount those	
			sites where development for	
			MSW or C&I waste	
			management facilities would	

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILTIES

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
			contravene national planning	
			policy.	
	English	In some cases, a site would be so wholly contrary to	Noted	See Policy W6 of the
	Heritage	national policy guidance that it should not be taken forward		Preferred Approach.
		- no matter what it scores against other criteria. For	The Council will take forward	
		example, a site which resulted in the destruction of a	Option 1 as the preferred	
		Scheduled Monument would wholly conflict with the advice	approach but with a	
		in PPG 16 and, as a result, the site would unlikely gain	simplified and revised	
		consent – unless there were no other sites available.	approach to site assessment	
		As part of this first sift of the long list, the cases where sites	criteria and the use of a	
		are so in conflict with national policy guidance should be	preeligibility site identification	
		able to be ruled out no matter what they score.	process to discount those	
		Given the Council's stated intention that the LDF, as a	sites where development for	
		whole, should deliver sustainable development, the waste	MSW or C&I waste	
		strategy should include a category which scores the	management facilities would	
		potential site to use a non-road distribution (i.e. rail, river or	contravene national planning	
		canal).	policy.	
		It would be helpful to set out how it envisaged the likely		
		effects upon the surrounding environment might be scored		
		using the proposed matrix. One can envisage that sites		
		may score well against one aspect (e.g. landscape) but		
		poorly against another (e.g. biodiversity). In such a case,		
		would the score for Surrounding Environment simply be		

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

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		averaged out? If so this could mask some areas where there are particularly harmful effects. In some cases the impact upon one aspect of the environment might be so severe that the score would be 0 no matter how high it scored against other elements of the environment. It may well be necessary to a further sift of sites to address this issue.		
	Burley Parish Council	Unable to comment		
	Environment Agency	Any waste management facility would be subject to a permit under the environmental permitting regulations. The objective of the permit is to prevent harm to the environment or human health. For incinerators emission limits are set to comply with those in the Waste Incineration Directive which are based on World Health Organisation Standards. A permit would not be issued in a particular location if air quality standards would be breached as a result of the installation. Impacts can be considered in the context of the controls required by the permit: • Emission limits for air (with an assessment against the Waste Incineration Directive), land and water.	The Council will take forward Option 1 as the preferred approach but with a simplified and revised approach to site assessment criteria and the use of a preeligibility site identification process to discount those sites where development for MSW or C&I waste management facilities would contravene national planning	See Policy W6 of the Preferred Approach.

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT **FACILTIES** Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required? **Summary of Representation** Council Response Rep Name / **Action Required Organisation** ID policy. An odour management plan A noise assessment A consideration of energy efficiency A consideration of how to minimise waste produced and raw material used. An Environmental Management System An accident management plan • Requirement to use 'Best Available Techniques' to ensure compliance. The Health protection Agency have issued guidance on the potential health effects of modern waste incinerators: Below is the first paragraph of the summary of the report 'The Impact on Health of Emissions to Air from Municipal Waste Incinerators' - Health Protection Agency - September 2009' 'The Health Protection Agency has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health. While it is not possible to rule out adverse health effects from modern, well regulated municipal waste incinerators with complete certainty, any potential damage to the health of those living close-by is likely to be very small, if detectable. This

view is based on detailed assessments of the effects of air pollutants on health and on the fact that modern and well managed municipal waste incinerators make

ISSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT FACILTIES

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		only a very small contribution to local concentrations of air pollutants.'		
	Environment Agency	We accept that permits cannot control the public's perception of how their quality of life is affected by a facility because the experience of odour or noise for example is personal. There may be no direct threat to health or environment but some people may still find the facility unacceptable. We would advise separating odour from air emissions as an impact, experience tells us that odour is the most common cause of complaint and has to date been more of a problem with technologies designed to handle large quantities of mixed biodegradable waste. Proximity to markets/uses for heat or recyclate should be considered when assessing sites for locating waste management sites. The closer the end user of any heat or recyclate the more sustainable the transaction to the end user. There is no specific criterion for flood risk. Please see the section at the end of this letter on the requirements of PPS25: Development and Flood Risk.	The Council will take forward Option 1 as the preferred approach but with a simplified and revised approach to site assessment criteria and the use of a preeligibility site identification process to discount those sites where development for MSW or C&I waste management facilities would contravene national planning policy.	See Policy W6 of the Preferred Approach.
	Bradford Wildlife Group	Appendix 1 – S/E1.6. John Escritt Road: This is not advisable to place on this list. Too near Bingley South Bog SSSI. Not advisable for Waste facilities.	Noted The Council will take forward	See Policy W6 of the Preferred Approach.
		Sites should not be allocated in sensitive Ecological Areas. List needs to be checked out with sensitivity in mind.	Option 1 as the preferred	

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

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

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
			approach but with a	
			simplified and revised	
			approach to site assessment	
			criteria and the use of a	
			preeligibility site identification	
			process to discount those	
			sites where development for	
			MSW or C&I waste	
			management facilities would	
			contravene national planning	
			policy.	
	Bradford Waste	Comment on the location criteria etc already made above.	Noted	See Policy W6 of the
	Disposal			Preferred Approach.
	Authority		The Council will take forward	
	(WDA)		Option 1 as the preferred	
			approach but with a	
			simplified and revised	
			approach to site assessment	
			criteria and the use of a	
			preeligibility site identification	
			process to discount those	
			sites where development for	
			MSW or C&I waste	

ISSU	SSUE 4: LOCATIONAL CRITERIA FOR MUNICIPAL SOLID WASTE AND COMMERCIAL AND INDUSTRIAL WASTE MANAGEMENT				
	FACILTIES				
Question 16: Are these the right criteria and weighting? If not, then please say why. Are there any additional criteria required?					
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
			management facilities would		
			contravene national planning		
			policy.		

ISSU	ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE					
Ques	Question 17: Which option do you consider the most appropriate and why?					
Rep	Name /	Summary of Representation	Council Response	Action Required		
ID	Organisation					
	Mr Martin	Option 1 initially appears to be sensible but only really	Noted.	See Policy W7 of the		
	Millmore –	applies to large demolition projects. The bulk of C&D waste		Preferred Approach report.		
	Minerals	still comes from a plethora of small sites where on-site	The Council's preferred			
	Planning Group	recycling is impractical and unacceptable.	policy approach is to adopt			
			Option 3. This is on the basis			
			that there is strong consultee			
			support provided the policy			
			distinguishes between			
			CDEW generated through			
			large-scale demolition and			
			development projects and			
			those on smallscale sites			
			where on-site recycling is			

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
			often impractical or not	
			possible. It is further	
			supported by the SA findings	
			provided the generation of	
			further CDEW is minimised in	
			accordance with Bradford's	
			established waste hierarchy.	
			A criteria based approach will	
			be established with additional	
			policy wording emphasising	
			the preference for re-use /	
			adaptation of existing	
			buildings where viable as an	
			initial policy imperative.	
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			
	Highways	The Agency would encourage Option 1, the maximisation of	Noted.	See Policy W7 of the
	Agency	on-site recycling and re-use of construction and demolition		Preferred Approach report.
		waste to minimise waste arisings. However, it does	The Council's preferred	
		recognise that there may still be a need to dispose of some	policy approach is to adopt	

	ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE				
Ques	stion 17: Which o	option do you consider the most appropriate and why?			
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
		waste off site, therefore would welcome the criteria based	Option 3. This is on the basis		
		approach for locating new expanded waste management	that there is strong consultee		
		facilities as long as it includes a criterion relating to impact	support provided the policy		
		on the SRN.	distinguishes between		
			CDEW generated through		
			large-scale demolition and		
			development projects and		
			those on smallscale sites		
			where on-site recycling is		
			often impractical or not		
			possible. It is further		
			supported by the SA findings		
			provided the generation of		
			further CDEW is minimised in		
			accordance with Bradford's		
			established waste hierarchy.		
			A criteria based approach will		
			be established with additional		
			policy wording emphasising		
			the preference for re-use /		
			adaptation of existing		
			buildings where viable as an		
			initial policy imperative.		
	Yorkshire	Option 1.	Noted.	See Policy W7 of the	
		1			

90 ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE Question 17: Which option do you consider the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID Wildlife Trust Preferred Approach report. The Council's preferred policy approach is to adopt Option 3. This is on the basis that there is strong consultee support provided the policy distinguishes between CDEW generated through large-scale demolition and development projects and those on smallscale sites where on-site recycling is often impractical or not possible. It is further supported by the SA findings provided the generation of further CDEW is minimised in accordance with Bradford's established waste hierarchy. A criteria based approach will be established with additional policy wording emphasising the preference for re-use /

adaptation of existing

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE Question 17: Which option do you consider the most appropriate and why? Name / **Summary of Representation Council Response Action Required** Rep Organisation ID buildings where viable as an initial policy imperative. **Burley Parish** Option 1 Noted. See Policy W7 of the Council Preferred Approach report. The Council's preferred policy approach is to adopt Option 3. This is on the basis that there is strong consultee support provided the policy distinguishes between CDEW generated through large-scale demolition and development projects and those on smallscale sites where on-site recycling is often impractical or not possible. It is further supported by the SA findings provided the generation of further CDEW is minimised in accordance with Bradford's established waste hierarchy. A criteria based approach will be established with additional

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE Question 17: Which option do you consider the most appropriate and why? **Summary of Representation** Council Response **Action Required** Rep Name / **Organisation** ID policy wording emphasising the preference for re-use / adaptation of existing buildings where viable as an initial policy imperative. Environment We agree that the first priority is to reduce and reuse Noted. See Policy W7 of the Agency construction waste on site through the use of sustainable Preferred Approach report. construction methods and site waste management plans. A The Council's preferred building materials reuse infrastructure should be policy approach is to adopt encouraged - some councils are considering building Option 3. This is on the basis material 'shops' at civic amenity sites. that there is strong consultee support provided the policy Reuse and recycling on site is the most sustainable option distinguishes between but sometimes this is not viable on smaller construction CDEW generated through sites. Lots of unsorted builders waste is still landfilled and it large-scale demolition and is widely fly tipped. In order to increase recycling and development projects and reduce fly tipping we would advocate some offsite provision those on smallscale sites for small builders. where on-site recycling is often impractical or not possible. It is further supported by the SA findings provided the generation of further CDEW is minimised in accordance with Bradford's

93 ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE Question 17: Which option do you consider the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID established waste hierarchy. A criteria based approach will be established with additional policy wording emphasising the preference for re-use / adaptation of existing buildings where viable as an initial policy imperative. Bradford [Option 1 ticked on form] See Policy W7 of the Noted. Wildlife Group Recycling and reuse ideally should be done on site if Preferred Approach report. possible. The Council's preferred policy approach is to adopt Option 3. This is on the basis that there is strong consultee support provided the policy distinguishes between CDEW generated through large-scale demolition and development projects and those on smallscale sites where on-site recycling is often impractical or not possible. It is further

supported by the SA findings

94 ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE Question 17: Which option do you consider the most appropriate and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID provided the generation of further CDEW is minimised in accordance with Bradford's established waste hierarchy. A criteria based approach will be established with additional policy wording emphasising the preference for re-use / adaptation of existing buildings where viable as an initial policy imperative. **Bradford Waste** Preference is for option 3 as this seems the most flexible See Policy W7 of the Noted. and complete position. Disposal Preferred Approach report. Authority The Council's preferred (WDA) policy approach is to adopt Option 3. This is on the basis that there is strong consultee support provided the policy distinguishes between CDEW generated through large-scale demolition and development projects and those on smallscale sites

where on-site recycling is

ISSUE 5: MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
			often impractical or not	
			possible. It is further	
			supported by the SA findings	
			provided the generation of	
			further CDEW is minimised in	
			accordance with Bradford's	
			established waste hierarchy.	
			A criteria based approach will	
			be established with additional	
			policy wording emphasising	
			the preference for re-use /	
			adaptation of existing	
			buildings where viable as an	
			initial policy imperative.	
	Environment	Option 1	Noted.	See Policy W7 of the
	and Waste			Preferred Approach report
	Management		The Council's preferred	
	Improvement		policy approach is to adopt	
	Committee		Option 3. This is on the basis	
			that there is strong consultee	
			support provided the policy	
			distinguishes between	
			CDEW generated through	
			large-scale demolition and	

Rep	Name /	Summary of Representation	Council Response	Action Required
)	Organisation			
			development projects and	
			those on smallscale sites	
			where on-site recycling is	
			often impractical or not	
			possible. It is further	
			supported by the SA findings	
			provided the generation of	
			further CDEW is minimised in	
			accordance with Bradford's	
			established waste hierarchy.	
			A criteria based approach will	
			be established with additional	
			policy wording emphasising	
			the preference for re-use /	
			adaptation of existing	
			buildings where viable as an	
			initial policy imperative.	
	l l		1	

Ques	Question 18: Are there any other options that should be considered?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				

Ques	tion 18: Are ther	e any other options that should be considered?		91
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Mr Martin	C&D waste recycling and disposal facilities can be located	Noted.	
	Millmore –	in disused (and indeed some active) quarries.		
	Minerals	Policies should not dismiss this option.	The use of mineral	
	Planning Group		extractions sites considered	
			within the sequential	
			assessment of preferred	
			sites.	
	Imogen	No Comment Made		
	Scotney - Scott			
	Wilson on			
	behalf of Earth			
	Tech and			
	Skanska (ETS)			
	Highways	No Comment		
	Agency			
	Yorkshire	No Comment Made		
	Wildlife Trust			

Ques	tion 18: Are ther	e any other options that should be considered?		30
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	English	As set out in our response to Question 6, in order to reduce	Noted.	See Policy WDM4 of the
	Heritage	the amounts of construction and demolition waste, the LDF	The Core Strategy will cover areas of sustainable	Preferred Approach report.
		needs to start from the principle that the most sustainable		
		strategy is to reuse/adapt the existing building stock.	construction methods.	
		Clearly there will be cases where this is either impracticable		
		or can be shown not to be the most sustainable option. In	The Council will also explore	
		such cases, demolition of the building would be permitted.	how this can be incorporated	
		However, the Plan should seek to reuse the materials	into the Preferred Approach	
		especially those, such as dressed stone and roofing slates,	report.	
		which are typically used within the District's settlements and		
		can help reduce the need for extraction of building stone.		
		Only where such materials cannot be reused for building,		
		should they be allowed to be crushed as aggregate or		
		hardcore. This approach might be able to be pursued		
		through though Conditions on Planning Approvals and the		
		plan may need to make provision for the establishment of		
		facilities to recycle such buildings materials.		
	Burley Parish	No Comment Made		
	Council			
	Bradford	No Comment Made		
	Wildlife Group			
	Bradford Waste	No Comment		
	Disposal			
	Authority			
	(WDA)			

Ques	Question 18: Are there any other options that should be considered?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	Environment	Option 3	See response to Q18.		
	and Waste				
	Management				
	Improvement				
	Committee				

ISSU	ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS				
Ques	tion 19: Which o	ption do you consider the most appropriate for Issue 6 an	d why?		
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	Mr Martin	The option 1 scenario is covered in negative comments.	Noted.	See Policy W8 and W9 of the	
	Millmore –	Hazardous waste arisings should, wherever practical /		Preferred Approach.	
	Minerals	possible, be dealt with within the district and not transported	The Council's preferred		
	Planning Group	vast distances.	policy approach is to take		
			forward Option 3 including		
			the development of a		
			criterion based policy for		
			locating Agricultural waste		
			and for Hazardous waste		
			streams. Detailed matters of		
			the environmental, transport,		
		_	energy generation and site		
			restoration will be dealt with		

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS

Ques	Question 19: Which option do you consider the most appropriate for Issue 6 and why?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
			through separate Waste		
			Development Management		
			policies This option is		
			preferred on the basis of the		
			need to ensure flexibility and		
			choice in the District's		
			approach to handling other		
			waste streams. It also		
			reflects the balance of waste		
			management facilities and		
			forecast need identified in the		
			Waste Management DPD.		
	Imogen	No Comment Made			
	Scotney - Scott				
	Wilson on				
	behalf of Earth				
	Tech and				
	Skanska (ETS)				
	Highways	The Agency does not have a favoured option but would like	Noted.	See Policy W8 and W9 of the	
	Agency	to have an opportunity to be consulted in future on locations		Preferred Approach.	
		of potential new sites for managing hazardous waste.	The Council's preferred		
			policy approach is to take		
			forward Option 3 including		
			the development of a		

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation		criterion based policy for	
			locating Agricultural waste	
			and for Hazardous waste	
			streams. Detailed matters of	
			the environmental, transport,	
			energy generation and site	
			restoration will be dealt with	
			through separate Waste	
			Development Management	
			policies This option is	
			preferred on the basis of the	
			need to ensure flexibility and	
			choice in the District's	
			approach to handling other	
			waste streams. It also	
			reflects the balance of waste	
			management facilities and	
			forecast need identified in the	
			Waste Management DPD.	
	Yorkshire	No Comment Made		
	Wildlife Trust			
	Burley Parish	Option 3	Noted.	See Policy W8 and W9 of the
	Council			Preferred Approach.
			The Council's preferred	

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS

Rep	Name /	Summary of Representation	Council Response	Action Required
)	Organisation			
			policy approach is to take	
			forward Option 3 including	
			the development of a	
			criterion based policy for	
			locating Agricultural waste	
			and for Hazardous waste	
			streams. Detailed matters of	
			the environmental, transport,	
			energy generation and site	
			restoration will be dealt with	
			through separate Waste	
			Development Management	
			policies This option is	
			preferred on the basis of the	
			need to ensure flexibility and	
			choice in the District's	
			approach to handling other	
			waste streams. It also	
			reflects the balance of waste	
			management facilities and	
			forecast need identified in the	
			Waste Management DPD.	
	Bradford	Option 2. How much hazardous waste are we producing		
	Wildlife Group	and will produce in future? Can it not be cut down.		

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS Question 19: Which option do you consider the most appropriate for Issue 6 and why? **Action Required Summary of Representation Council Response** Rep Name / ID **Organisation** See Policy W8 and W9of the Environment Hazardous waste Noted. Agency Preferred Approach. The Council's preferred Planning provision for hazardous waste management is likely to benefit from regional consultation and consultation policy approach is to take with neighbouring authorities. Sites for a proposed forward Option 3 including hazardous waste facility would be subject to rigorous the development of a environmental risk assessments before a permit could be criterion based policy for granted. This should be borne in mind when proposing sites locating Agricultural waste for hazardous wastes. and for Hazardous waste streams. Detailed matters of Agricultural waste the environmental, transport, energy generation and site We agree that criteria based policies would be better for restoration will be dealt with agricultural waste. We have little reliable data on through separate Waste agricultural waste but anecdotally our feeling is that some **Development Management** types of agricultural waste are being dealt with on farms policies This option is and that there is increasing interest in anaerobic digestion preferred on the basis of the and composting for dealing with slurries and vegetable need to ensure flexibility and waste, on a relatively small scale. Criteria based policies choice in the District's which recognise the impacts of these types of technologies approach to handling other would prove useful. waste streams. It also reflects the balance of waste Other types of agricultural waste such as packaging, scrap management facilities and forecast need identified in the metal and construction waste are more likely to be dealt

Ques	tion 19: Which o	option do you consider the most appropriate for Issue 6 an	d why?	
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
		with off farm as commercial industrial waste.	Waste Management DPD.	
	Bradford Waste	Issue 6	Noted.	See Policy W8 and W9 of the
	Disposal	Option 2 – the small values of hazardous wastes and the		Preferred Approach.
	Authority	many varying types of specialised treatments required	The Council's preferred	
	(WDA)	makes new site identification as suggested in option 1	policy approach is to take	
		inappropriate.	forward Option 3 including	
			the development of a	
			criterion based policy for	
			locating Agricultural waste	
			and for Hazardous waste	
			streams. Detailed matters of	
			the environmental, transport,	
			energy generation and site	
			restoration will be dealt with	
			through separate Waste	
			Development Management	
			policies This option is	
			preferred on the basis of the	
			need to ensure flexibility and	
			choice in the District's	
			approach to handling other	
			waste streams. It also	
			reflects the balance of waste	
			management facilities and	

ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS Question 19: Which option do you consider the most appropriate for Issue 6 and why? **Summary of Representation Council Response Action Required** Rep Name / **Organisation** ID forecast need identified in the Waste Management DPD. Option 3 – need a policy for all types of waste (could be a Noted. See Policy W8 & W9 of the Environment and Waste combination of 1 and 3?) Preferred Approach. The Council's preferred Management Improvement policy approach is to take Committee forward Option 3 including the development of a criterion based policy for locating Agricultural waste and for Hazardous waste streams. Detailed matters of the environmental, transport, energy generation and site restoration will be dealt with through separate Waste **Development Management** policies This option is preferred on the basis of the need to ensure flexibility and choice in the District's approach to handling other waste streams. It also reflects the balance of waste

	ISSUE 6: MANAGEMENT OF 'OTHER' WASTE STREAMS Question 19: Which option do you consider the most appropriate for Issue 6 and why?				
Rep	Rep Name / Summary of Representation Council Response Action Required				
ID	Organisation				
			management facilities and		
			forecast need identified in the		
			Waste Management DPD.		

Rep	Name /	Summary of Representation	Council Response	Action Required
D	Organisation			
	Mr Martin	No – There may be a need for new facilities. Not all farms	See response to Q19.	See Policy W8 of the
	Millmore –	are suitable for disposal at the point of origin.		Preferred Approach report
	Minerals		The preferred policy	
	Planning Group		approach will respond to	
			comments made relating to	
			the appropriateness of	
			encouraging on-site	
			treatment of Agricultural	
			waste in accordance with	
		~	GAEC requirements in the	
			Common Agricultural Policy.	

Question 20: Is it appropriate to assume that agricultural waste will be dealt with at point of origin rather than requiring new facilities / sites to be identified? Name / **Summary of Representation** Council Response Rep **Action Required** Organisation ID No Comment Made Imogen Scotney - Scott Wilson on behalf of Earth Tech and Skanska (ETS) Highways No Comment Agency Yorkshire This is the practice that is promoted to farmers under the See response to Q19. See Policy W8 of the Wildlife Trust GAEC requirements of the CAP. Preferred Approach report. The preferred policy approach will respond to comments made relating to the appropriateness of

encouraging on-site treatment of Agricultural waste in accordance with GAEC requirements in the Common Agricultural Policy.

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

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action Required
	Burley Parish	It is certainly desirable	See response to Q19.	See Policy W8 of the
	Council			Preferred Approach report.
			The preferred policy	
			approach will respond to	
			comments made relating to	
			the appropriateness of	
			encouraging on-site	
			treatment of Agricultural	
			waste in accordance with	
			GAEC requirements in the	
			Common Agricultural Policy.	
	Bradford	Yes. It is appropriate.	See response to Q19.	See Policy W8 of the
	Wildlife Group			Preferred Approach report.
			The preferred policy	
			approach will respond to	
			comments made relating to	
			the appropriateness of	
			encouraging on-site	
			treatment of Agricultural	
			waste in accordance with	
			GAEC requirements in the	
			Common Agricultural Policy.	

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

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action Required
	Bradford Waste	Yes	See response to Q19.	See Policy W8 of the
	Disposal			Preferred Approach report.
	Authority		The preferred policy	
	(WDA)		approach will respond to	
			comments made relating to	
			the appropriateness of	
			encouraging on-site	
			treatment of Agricultural	
			waste in accordance with	
			GAEC requirements in the	
			Common Agricultural Policy.	
	Environment	No – policy must be in situ – policy not left to be abused.	See response to Q19.	See Policy W8 of the
	and Waste	Council needs to be proactive in this area		Preferred Approach report.
	Management		The preferred policy	
	Improvement		approach will respond to	
	Committee		comments made relating to	
			the appropriateness of	
			encouraging on-site	
			treatment of Agricultural	
			waste in accordance with	
			GAEC requirements in the	
			Common Agricultural Policy.	

Ques	Question 21: Should the DPD consider any other types of waste?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	Mr Martin	Yes – Green Waste	Noted.	See proposed allocation sites	
	Millmore –		The site put forward within	within the Preferred Approach	
	Minerals		the Preferred Approach will	report.	
	Planning Group		take into account the		
			possibility of locating facilities		
			capable of managing green		
			waste.		
	Imogen	No Comment Made			
	Scotney - Scott				
	Wilson on				
	behalf of Earth				
	Tech and				
	Skanska (ETS)				
	Highways	No Comment			
	Agency				
	Yorkshire	No Comment			
	Wildlife Trust				
	Burley Parish	No Comment Made			
	Council				
	Bradford	I think the DPD has listed most of the waste "Streams"	Noted.		
	Wildlife Group	affected.			
	Bradford Waste	No			
	Disposal				
	Authority				
	(WDA)				

Ques	Question 21: Should the DPD consider any other types of waste?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	Environment	Without a doubt – we need to control all waste generated	Noted.		
	and Waste				
	Management				
	Improvement				
	Committee				

	SSUE 7: MANAGEMENT OF RESIDUAL WASTE					
Ques	Question 22: Which option do you consider the most appropriate for Issue 7 and why?					
Rep	Name /	Summary of Representation	Council Response	Action Required		
ID	Organisation					
	Mr Martin	Option 1 – Encourages Fly Tipping	Noted.	See Policy W10 of the		
	Millmore –			Preferred Approach.		
	Minerals		The Council's preferred			
	Planning Group		approach is to identify where			
			additional Residual waste			
			capacity within existing			
			facilities can be used			
			alongside a criteria based			
			policy for the identification of			
			any new residual waste			
			facilities in the District in the			
		V	medium and long term			
			subject to future monitoring			

112 **ISSUE 7: MANAGEMENT OF RESIDUAL WASTE** Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID and identified need. This approach accords with and emphasises the need to support alternative technologies for treating Residual waste and reflects the need to (co)locate facilities in close proximity to waste arisings. Option 2 - Best Option See Policy W10 of the Noted. Preferred Approach. The Council's preferred approach is to identify where additional Residual waste capacity within existing facilities can be used alongside a criteria based policy for the identification of any new residual waste facilities in the District in the medium and long term subject to future monitoring and identified need. This

approach accords with and

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID emphasises the need to support alternative technologies for treating Residual waste and reflects the need to (co)locate facilities in close proximity to waste arisings. Option 4 – Unsustainable due to excessive transport See Policy W10 of the Noted. Preferred Approach. distances. The Council's preferred approach is to identify where additional Residual waste capacity within existing facilities can be used alongside a criteria based policy for the identification of any new residual waste facilities in the District in the medium and long term subject to future monitoring and identified need. This approach accords with and emphasises the need to support alternative

114 ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation** Council Response Rep Name / **Action Required Organisation** ID technologies for treating Residual waste and reflects the need to (co)locate facilities in close proximity to waste arisings. See Policy W10 of the It is understood, from attending the Stakeholder Event held Imogen Noted. in Bradford on 8th December 2009 that, in relation to Issue Scotney - Scott Preferred Approach. Wilson on 7, the term 'residual waste' is taken to mean the very last The Council's preferred behalf of Earth proportion the waste (i.e. approach is to identify where post recycling/recovery/treatment, etc) and an example of this is Tech and additional Residual waste Skanska (ETS) the ash from an Energy-from-Waste (EfW) facility. It does capacity within existing not mean, for example, the residual MSW that remains after facilities can be used kerbside recycling. This is not currently clear in the alongside a criteria based document. policy for the identification of Generally speaking, residual waste facilities should be any new residual waste located near the source of the waste (co-located if at all facilities in the District in the possible). An example of this is an incinerator bottom ash medium and long term processing facility located on the same site or adjacent to subject to future monitoring an EfW or wastewater treatment facility located on the and identified need. This same site or adjacent to an Anaerobic Digestion (AD) approach accords with and facility. emphasises the need to support alternative technologies for treating Residual waste and reflects

115 **ISSUE 7: MANAGEMENT OF RESIDUAL WASTE** Question 22: Which option do you consider the most appropriate for Issue 7 and why? Name / **Summary of Representation Council Response Action Required** Rep **Organisation** ID the need to (co)locate facilities in close proximity to waste arisings. Highways Option 4 is the least preferable of the options for the Noted. See Policy W10 of the Agency Agency, but recognises the need for a transition period in Preferred Approach. The Council's preferred moving from reliance on external sites to a high level of self-sufficiency. approach is to identify where additional Residual waste capacity within existing facilities can be used alongside a criteria based policy for the identification of any new residual waste facilities in the District in the medium and long term

subject to future monitoring

and identified need.

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation Council Response** Name / **Action Required** Rep ID **Organisation** See Policy W10 of the Steve Gibbs -Option 1 Noted. The Arley PCE support the principal of the waste hierarchy, and Preferred Approach. The Council's preferred Consulting recognise that landfill is at the foot of the hierarchy. Company Nevertheless, as para 5.42 recognises, it is likely that some approach is to identify where Limited on additional Residual waste residual waste will remain to be landfilled. behalf of P We would have thought that the encouragement of capacity within existing Casey (Enviro) movement the hierarchy through alternative facilities can be used up Ltd (PCE) technologies is more properly a matter for the Core alongside a criteria based Strategy, for which the Preferred Option consultation is not policy for the identification of yet available. any new residual waste Option 1 suggests "limiting landfill capacity", which we facilities in the District in the assume would reinforce any positive support for the other medium and long term technologies. subject to future monitoring The question is, then, how to match availability with need. and identified need. This The need for landfill is likely to vary both with progress in approach accords with and the provision of the other technologies, and the quantitative emphasises the need to and qualitative suitability of the wastes for treatment. The support alternative latter are likely to vary according to development of the technologies for treating economy, technology and legislation. Residual waste and reflects Landfill can provide a robust final disposal option that is the need to (co)locate less sensitive to changes in waste quantity band facilities in close proximity to composition than other options. waste arisings. The availability of landfill is difficult to control. The overall capacity of a landfill is largely determined by site-specific

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID factors. The rate of release of that capacity is usually determined by factors such as traffic impacts or operational capacity of site plant. To attempt to control the rate of release (annual input) for policy reasons may risk the landfill being uneconomic to operate, as many costs are fixed. Whilst Option 1 is superficially attractive in policy terms, PCE wish to see much greater detail of the mechanisms for limiting capacity. Option 2 It follows from our views on Option 1 that we consider that landfill capacity should be provided within the District. Option 3 The combination of options is reasonable in policy terms subject to the mechanism for limiting capacity. We would be open to discussion as to how capacity could be limited so as not to prejudice the waste hierarchy.

118 ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation Council Response Action Required** Rep Name / Organisation ID Steve Gibbs -Option 4 We consider that the proximity principle clearly favours the The Arley Consulting provision of capacity in the District, and Bradford's Company emerging Core Strategy Vision also clearly favours this. Limited on Our reading of the Consultation paper is that the Council behalf of P continues to rake this view - for example, paras 1.2, 1.4, Casey (Enviro) and 2.7. Ltd (PCE) It is unlikely that all areas will be equally able to provide continued. landfill capacity, and therefore to use up the sub-regional capacity without assurance that all authorities would then be equally able to replace it on a self-sufficient basis is unacceptable. For the reasons stated above, PCE prefer Option 2, but Option 3 could be acceptable subject to the mechanism of capacity limitation. See Policy W10 of the Option 1. This would send out a robust message to the Yorkshire Noted. Wildlife Trust Preferred Approach. public and encourage a concerted effort to reduce waste. The Council's preferred approach is to identify where additional Residual waste capacity within existing facilities can be used

alongside a criteria based

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE

Ques	uestion 22: Which option do you consider the most appropriate for Issue 7 and why?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
			policy for the identification of		
			any new residual waste		
			facilities in the District in the		
			medium and long term		
			subject to future monitoring		
			and identified need. This		
			approach accords with and		
			emphasises the need to		
			support alternative		
			technologies for treating		
			Residual waste and reflects		
			the need to (co)locate		
			facilities in close proximity to		
			waste arisings.		
	Burley Parish	Option 1	Noted.	See Policy W10 of the	
	Council			Preferred Approach.	
			The Council's preferred		
			approach is to identify where		
			additional Residual waste		
			capacity within existing		
			facilities can be used		
			alongside a criteria based		
			policy for the identification of		
			any new residual waste		

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE

Ques	Question 22: Which option do you consider the most appropriate for Issue 7 and why?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
			facilities in the District in the		
			medium and long term		
			subject to future monitoring		
			and identified need. This		
			approach accords with and		
			emphasises the need to		
			support alternative		
			technologies for treating		
			Residual waste and reflects		
			the need to (co)locate		
			facilities in close proximity to		
			waste arisings.		
	Bradford	Option 1. The other options advice that we cannot cut down	Noted.	See Policy W10 of the	
	Wildlife Group	our waste and it will increase over the years. Since the		Preferred Approach.	
		Council's intention is to send less.	The Council's preferred		
			approach is to identify where		
			additional Residual waste		
			capacity within existing		
			facilities can be used		
			alongside a criteria based		
			policy for the identification of		
			any new residual waste		
			facilities in the District in the		
			medium and long term		

121 ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation** Council Response **Action Required** Rep Name / **Organisation** ID subject to future monitoring and identified need. This approach accords with and emphasises the need to support alternative technologies for treating Residual waste and reflects the need to (co)locate facilities in close proximity to waste arisings. **Bradford Waste** Option 1 would seem the most appropriate in having See Policy W10 of the Noted. Disposal policies to reduce waste/residual wastes, but recognising Preferred Approach. Authority The Council's preferred that most waste treatment technologies will only divert (WDA) approach is to identify where between 80-95% of input away from landfill, leaving some of the residual still biologically active, but having no other additional Residual waste practical economic means of disposal other than landfill. capacity within existing (See comment in Question 1 on sub regional landfill facilities can be used capacity and need to export residue to landfill). There alongside a criteria based should be consideration for an Option 1 + 4 in combination policy for the identification of for Question 22. any new residual waste facilities in the District in the medium and long term subject to future monitoring

and identified need. This

ISSUE 7: MANAGEMENT OF RESIDUAL WASTE

Rep	ep Name / Summary of Representation Council Response Action Required				
י ס	Organisation				
			approach accords with and		
			emphasises the need to		
			support alternative		
			technologies for treating		
			Residual waste and reflects		
			the need to (co)locate		
			facilities in close proximity to		
			waste arisings.		
	Environment	Option 1. We must limit the easy option of falling back on	Noted.	See Policy W10 of the	
	and Waste	landfill. Landfill is no longer a policy option that we can		Preferred Approach.	
	Management	tolerate if alternatives can be found to deal with our waste.	The Council's preferred		
	Improvement		approach is to identify where		
	Committee		additional Residual waste		
			capacity within existing		
			facilities can be used		
			alongside a criteria based		
			policy for the identification of		
			any new residual waste		
			facilities in the District in the		
			medium and long term		
			subject to future monitoring		
			and identified need. This		
			approach accords with and		
			emphasises the need to		

123 ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why? **Summary of Representation** Council Response Name / **Action Required** Rep **Organisation** ID support alternative technologies for treating Residual waste and reflects the need to (co)locate facilities in close proximity to waste arisings. Environment There is certainly still scope for reducing the amount of Noted. See Policy W10 of the 'residual waste' which needs to be dealt with. Plans are in Preferred Approach. Agency The Council's preferred place to increase recycling of MSW. The position with Commercial Industrial and Construction waste however is approach is to identify where less clear. The first step should be to ensure that all waste additional Residual waste is treated as far up the hierarchy as possible, and that as capacity within existing much as possible is reused or recycled. facilities can be used alongside a criteria based An emerging issue over the past 12 months has been the policy for the identification of disposal or further treatment of the outputs from Mechanical any new residual waste Biological Treatment and Autoclave type facility commonly facilities in the District in the referred to as Compost Like Output or in some cases medium and long term Refuse derived Fuel. These outputs remain waste and as subject to future monitoring such require waste permits for their onward treatment or and identified need. This disposal. They cannot be spread to land without approach accords with and authorisation or burned for energy except in a Waste emphasises the need to Incineration Directive compliant incinerator. support alternative There is a need to plan for productive outlets for these technologies for treating

residual wastes, alongside the proposals for initial

	ISSUE 7: MANAGEMENT OF RESIDUAL WASTE Question 22: Which option do you consider the most appropriate for Issue 7 and why?				
Rep	Rep Name / Summary of Representation Council Response Action Required				
ID	Organisation				
		treatment.	Residual waste and reflects		
		Landfill is a last resort and any requirement for further	the need to (co)locate		
		capacity should be assessed on this basis.	facilities in close proximity to		
			waste arisings.		

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

Ques	tion 23: For Issu	e 7 Option 2, should additional capacity be identified in ex	isting or new sites?	
Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Steve Gibbs -	The key factor in identifying additional capacity must be the	See response to Q22.	See Policy W10 of the
	The Arley	suitability of the candidate sites.		Preferred Approach.
	Consulting			
	Company			
	Limited on			
	behalf of P			
	Casey (Enviro)			
	Ltd (PCE)			
	Highways	The Agency would welcome the consideration of new sites	See response to Q22.	See Policy W10 of the
	Agency	if these were located closer to the point of source and		Preferred Approach.
		therefore reduced the impact on the SRN.		
	Yorkshire	No Comment Made		
	Wildlife Trust			
	Burley Parish	No Comment Made		
	Council			
	Bradford	Waste to landfill sites options 2 and 4 contradict this	See response to Q22.	See Policy W10 of the
	Wildlife Group	aspiration.		Preferred Approach.
	Bradford Waste	As Bradford doesn't have much landfill capacity (zero for active	See response to Q22.	See Policy W10 of the
	Disposal	wastes?) any additional capacity will probably be new capacity if it		Preferred Approach.
	Authority	is to be provided within the district (see response in Question 22).		
	(WDA)			

Rep	Name /	Summary of Representation	Council Response	Action Required
ID	Organisation			
	Environment	Only in existing sites	See response to Q22.	See Policy W10 of the
	and Waste			Preferred Approach.
	Management			
	Improvement			
	Committee			

Ques	Question 24: Are there other options that should be considered for Issue 7?				
Rep	Name /	Summary of Representation	Council Response	Action Required	
ID	Organisation				
	Mr Martin	No Comments Made			
	Millmore –				
	Minerals				
	Planning Group				
	Imogen	No Comment Made			
	Scotney - Scott				
	Wilson on				
	behalf of Earth				
	Tech and				
	Skanska (ETS)				

Rep	Rep Name / Summary of Representation		Council Response	Action Required	
ID .	Organisation	·	•	·	
	Steve Gibbs -	We can see no other options.	Noted.		
	The Arley				
	Consulting				
	Company				
	Limited on				
	behalf of P				
	Casey (Enviro)				
	Ltd (PCE)				
	Highways	No Comment			
	Yorkshire	As a nation we should be looking to other EU states who	See response to Q22.	See Policy W10 of the	
	Wildlife Trust	are managing their waste more effectively.		Preferred Approach.	
	Burley Parish	No Comment Made			
	Council				
	Bradford	The way forward is surely:	See response to Q22.	See Policy W10 of the	
	Wildlife Group	Waste prevention – educate public etc.		Preferred Approach.	
		2. Reuse " " "			
		3. Recycle - & compost " "			
		4. Although we do not have the room for more landfill			
		sites - Some that are in use should be restored to			
		a natural landscape for encouraging Biodiversity.			
		5. Try some alternative technologies and Biological			
		Treatment			

Ques	Question 24: Are there other options that should be considered for Issue 7?					
Rep	Name /	Summary of Representation	Council Response	Action Required		
ID	Organisation					
	Bradford Waste	Option 1 + 4 combined.	See response to Q22.	See Policy W10 of the		
	Disposal			Preferred Approach.		
	Authority					
	(WDA)					
	Environment	No				
	and Waste					
	Management					
	Improvement					
	Committee					



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

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6.0 **APPENDIX 1 - PETITION**

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7.0 APPENDIX 2 - DISTRIBUTION LIST

LIST OF SPECIFIC STATUTORY CONSULTEES

Statutory and Specific Consultation Bodies and Infrastructure Organisations:

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

Adjoining Local Planning Authorities:

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

Bradford Council Elected Members:

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

Town and Parish Councils in Bradford District:

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

Town and Parish Councils in Neighbouring Local Authorities:

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

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

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

LIST OF SPECIFIC CONSULTEES - ASSOCIATED WASTE INDUSTRY PARTIES

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

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

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

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

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

LIST OF SPECIFIC CONSULTEES - WASTE SITE OPERATORS

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

Notification List (Possibly delete – discuss with Andrew)

CAP REF NO.	Name and Address	Email Address
	Mr Matt Olley Regional Planner Countryside Properties (Northern) Ltd Countryside House	

CAP	Name and Address	Email Address
REF		
NO.	Lakeside Drive	
	Centre Park	
	WARRINGTON	
	WA1 1RW Mr Jim Smith	
	Group Asset Manager	
	Group Asset and	
	Development Team	
	Bradford Community Housing Trust	
	Trust House	
	5 New Augustus Street	
	BRADFORD	
	BD1 5LL Mr Mike Benner	
	Chief Executive	
	Campaign For Real Ale	
	230 Hatfield Road	
	ST. ALBANS Herts	
	AL1 4LW	
	Ms Mhora Samuel	
	Director The Theatres Trust 22 Charing Cross Road	
	LONDON	
	WC2H 0QL	· ·
	Mr Paul Stock	
	Strategic Land Manager North Country Homes Group	
	Ltd	
	North Country House	
	Barlborough CHESTERFIELD	
	S43 4WP	
	Mr Sebastian Hanley	
	Dialogue Communicating Planning	
	136 – 148 Tooley Street	
	LONDON	
	SE1 2TU	
	Katie Adderley Planning Advisor	
	British Wind Energy	
	Association	

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	Berners Road	
	London	
	N1 0PW	
	Beverley Green Littman Robeson	
	21 Buckingham Street	
	LONDON	
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	Nathan Smith/Dan Mitchell	
	Barton Willmore Planning Partnership	
	3360 The Pentagon	
	Century Way	
	Thorpe Park	
	LEEDS LS15 8ZB	
	C P Holland	
	Development Director	
	George Wimpey Northern	
	Yorkshire Ltd Sandpiper House	
	Peel Avenue	
	Calder Park	
	WAKEFIELD	
	WF2 7UA	
	Robert Taylor Plot of Gold Ltd	
	Priory Park	
	Bunkers Hill	
	The Great North Road	
	ABERFORD West Yorkshire	
	LS25 3DF	
	Dianne Bowyer	
	DPDS Consulting Group	
	Old Bank House	
	5 Devizes Road SWINDON	
	SN1 4BJ	
	Mick Young	
	Little Germany	
	Developments Ltd	

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	David Short The Emerson Group Emerson House Heyes Lane Alderley Edge Cheshire SK9 7LF	
	Penny Trepka 142 Wilmer Road Heaton Bradford BD9 4AH	
	Chris Creighton Peacock and Smith 2a Josephs Well Hanover Walk LEEDS LS3 1AB	
	Depol Associates 44 Garstang Road PRESTON PR1 1NA	
	Rev. John Nowell The Vicarage Browgate Baildon	
	Rev Sarah Groves The Moravian Manse Browgate Baildon BD17 6BP	
	The Parish Priest St Aidan's Presbytery Baildon Road Baildon	
	Baildon Community Link 35 Cliffe Avenue Baildon BD17 6NX	
	Baildon	

CAP	Name and Address	Email Address
REF	Trains and Addition	Inan Addition
NO.		
	St Ann's Vestry Hall	
	2 Church Entry	
	LONDON	
	EC4V 5HB	
	Council for British	
	Archaeology 66 Boothman	<u> </u>
	YORK	
	YO30 7BZ	
	Society for the Protection of	
	Ancient Buildings	
	37 Spital Square	
	LONDON	
	E1 6DY	
	The Georgian Group	
	6 Fitzroy Square	
	LONDON	
	W1T 5DX	
	The Victorian Society 1 Priory Gardens	
	Bedford Park	
	LONDON	
	W4 1TT	
	The Twentieth Century	
	Society	
	70 Cowcross Street	
	LONDON	
	EC1M 6EJ	
	The Garden History Society	
	70 Cowcross Street LONDON	
	EC1M 6EJ	
	Andrew Bower	
	Renewables Developer	
	Npower Renewables	
	14b Redwell Court	
	Harmire Enterprise Park	
	Barnard Castle	
	Co. Durham	
	DL12 8BN	
	Hannah Philip/Claire	
	McIntosh	
	Vincent and Gorbing Ltd	
	Sterling Court	

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	ILKLEY LS29 9AH	
	Kate Anderson/Nichola	
	Sewell	
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	LEEDS LS1 5JL	
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	Indigo Planning	
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	17 Marble Street	
	MANCHESTER M2 3AW	
	Beverley Butler	
	Leith Planning Ltd	
	13 South Clifton Street	
	Lytham St Annes	
	Lancashire FY8 5HN	
	The Abbeyfield Society	
	Abbeyfield House	
	53 Victoria Street	
	St Albans	
	Herts AL1 3UW	
	Colin Burnett	
	Burnett Planning &	
	Development	
	Golden Cross House	
	8 Duncannon Street	
	London WC2N 4JF	
	Rachel Pierce	
	Sanderson & Weatherall	
	25 Wellington Street	
	LEEDS	

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	Jason Tait Planning Prospects Ltd 1 Broomhall Business centre Broomhall Lane WORCESTER WR5 2NT	
	Trevor Sayle Goldfinch Estates Ltd Elston West Road Weaverham CHESHIRE CW8 3HH Mr S MacPherson	
	Ben Rhydding Action Group/Save Us Pub 33 Wheatley Lane Ben Rhydding ILKLEY LS29 8BW	
	Val Summerscales Bradford District Chamber of Trade Gleave House C/o 91a Victoria Road Eccleshill BRADFORD	

CAP REF	Name and Address	Email Address
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	John Goodwin/Kate	
	Broadbank	
	Carter Jonas	
	Regent House	
	13 – 15 Albert Street	
	HARROGATE	
	HG1 1JX	
	Faye Wilders RPS	
	1 st Floor West	
	Cottons centre	
	Cottons Lane	
	LONDON	
	SE1 2QG	
	Conar Vallelly	
	How Planning	
	40 Peter Street MANCHESTER	
	M2 5GP	
	Mrs B Smith	
	42 Allerton Upper Green	
	BRADFORD	
	BD15 8AE	
	Jemma Benson	
	Future Energy Yorkshire	
	The Green Sand Foundry 99 Water Lane	
	LEEDS	
	LS11 5QN	
	Mr T Bendrien	
	Greenfield	
	62 Long Lane	
	Queensbury	
	BRADFORD	
	BD13 2LR Charles Patchett	
	Patchett Homes Ltd	
	180 Highgate Road	
	Queensbury	
	BRADFORD	
	BD13 1DS	
	Mr J P Lloyd	
	Nook Cottage	

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	Brierley Lane	
	Eaves	
	Woodplumpton	
	PRESTON	
	Lancashire PR4 0BJ	
	Martin Spiers	
	37 Bowland Avenue	
	Baildon	
	BRADFORD BD17 5SA	
	Felicity Wye	
	Planning Research Manager	
	Tribal MJP	
	70 High Street	
	Chislehurst	
	KENT BR7 5AQ	
	Duncan Hartley	
	Hartley Planning	
	Consultants	
	10 Margerison Road	
	Ilkley	
	LS29 8QU	
	Tom Jones	
	Moorhurst Langley Lane	
	BINGLEY	
	BD16 4ET	
	Christopher Whitmore	
	Andrew Martin Associates	
	Innovate Office	
	Lake View Drive	
	Sherwood Park	
	NOTTINGHAM NG15 0DT	
	F M Lister & Son	
	6 Manor Square	
	OTLEY	
	LS21 1QR	
	Dr A Tupholme	
	Yorkshire Gardens Trust	
	1 Heather View	
	ELDWICK	

CAP	Name and Address	Email Address
REF	riamo ana 7 aan 555	Email Addition
NO.		
	Bingley	
	BD16 3HH	
	Tamsin Cowley	
	Dunlop Haywards Planning Abbey House	
	32 Booth Street	
	MANCHESTER	
	M4 4QP	
	Steve Hughes	
	Hurstwood Group	
	Link 665 Business Centre	
	A65 Rosendale	
	Lancashire BB4 5HU	
	Mr Kurt Kunz	kunzkurt@aol.com;
	Gazeby Hall Farm	, , , , , , , , , , , , , , , , , , , ,
	Back Lane	
	Wilsden	
	Bradford	
	BD15 0LE James Woffendin	
	David Wilson Homes	
	Northern	
	Barfield House	
	Britannia Road	
	Morley	
	LEEDS	
	LS27 0DT	
	Edward Uwechue	
	DPP Apsley House	
	78 Wellington Street	
	LEEDS	
	LS1 2EQ	
	Emma Knott	
	Purearth PLC	
	Balderton Hall	
	Fernwood Newark	
	NG24 3JR	
	Mr C Narrainen	
	39 Keats Road	
	WILLENHALL	
	WV12 5HY	

CAP REF NO.	Name and Address	Email Address
	John Wilkinson Trench Wood Barn Higher Coach Road Baildon BD17 5SJ	
	National Offender Management Service c/o Lambert Smith Hampton Atkins Global Bank Chambers Faulkner Street MANCHESTER M1 4EH	
	Joanne Besford and Tony Zacharczuk 108 Westfield Lane Idle BRADFORD BD10 8UQ	
	Mr & Mrs Filligan Hollyhocks 37A Tong Lane Tong Village Bradford BD4 0RT	
	Vicki Richardson Walton & Co 2 Queen Street LEEDS LS1 2TW	vicki.richardson@walton-co.co.uk;
	Jay Everett Director CB Richard Ellis Ltd Bank House 27 King Street Leeds LS1 2HL	jay.everett@cbre.com;
	Kate Matthews Assistant Planner Firstplan 25 Floral Street LONDON WC2E 9DS Andrew E Brown	kmatthews@firstplan.co.uk; andrew.brown@brookhousegroup.co.uk;

CAP	Name and Address	Email Address
REF NO.		
	Land and Planning Manager Brookhouse Group Prospect House 168 – 170 Washway Road Sale Cheshire M33 6RH	
	Laura Haworth 28 The Mistral Bradford BD10 8WQ	lhaw@aol.com;
	Rachael Probert Taylor Young Vanilla Factory 39 Fleet Street LIVERPOOL L1 4AR	rachael.probert@tayloryoung.co.uk;
	Gemma Brickwood Planning Potential Palace House 3 Cathedral Street LONDON SE1 9DE	gemma@planningpotential.co.uk;
	Annette Elliott Retail Planning Liaison Manager Property Division – Planning The Co-operative Group Ltd 5th Floor, Old Bank Building Hanover Street Manchester M60 0AB	annette_e@coop.co.uk;
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	Heidi Sobers 4 Festival Square BRADFORD BD1 5BD	heidi.sobers@bradford.gov.uk;
	John & Judith Bolland 127 Apperley Road Idle BRADFORD BD10 0AX	j.bolland@challenge.ngfl.ac.uk;
	Sally Fletcher Januarys York House	sfletcher@januarys.co.uk;

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	Aneesha Jain Turley Associates The Chancery 58 Spring Gardens Manchester M2 1EW	ajain@turleyassociates.co.uk
	Ben R Coles Strategic Land & Planning Manager	Benjamin.Coles@taylorwimpey.com;

CAD	Nome and Address	Fmail Address
CAP REF	Name and Address	Email Address
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	WF2 7UA	
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	Anthony Greaves	AGREAVES@henryboot.co.uk;
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	James Sheppard Consultant	James. Sneppard@eu.jii.com,
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	Ali-Marie Ladwa	amladwa@googlemail.com;
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	Thackley	
	BD10 8WN	Luka al'aman @a d'
	Luke Plimmer	Luke.plimmer@martineau-uk.com;
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	No 1. Colmore Square	
	Birmingham	
	B4 6AA Mark Fisher	Jarmanm@aol.com;
	Facility Development	Jannanne aul.com,
	Manager	
	The Lawn Tennis	
	THE LAWIT FOILIS	

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	SW15 5JQ Land & Development Manager Land & Development (B1) National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6TG	
	Andy Rollinson Rollinson Planning Consultancy 80 Main St Menston Ilkley LS29 6HS	andy@rollinsonplanningconsultancy.co.uk;
	Andrew Roberts Strategic Land manager George Wimpey West Yorkshire Ltd Taylor Wimpey Sandpiper House Peel Avenue Wakefield WF2 7UA	Andy.Roberts@taylorwimpey.com;
	Nadine Illingworth Faxfleet Residents Association 68 Rathmell Street Bradford BD5 9QJ	n.illingworth@fsmail.net;
	Mrs Samantha Maddocks 3rd Queensbury Guides c/o 38 Ashlar Grove Queensbury Bradford BD13 2SP	samantha.claire@sky.com;
	David J Rhodes Oakenshaw Residents'	padama6@tiscali.co.uk;

CAP REF	Name and Address	Email Address
NO.		
	Association	
	Dale House	
	Illingworth Road	
	Oakenshaw	
	BRADFORD	
	BD12 7AJ	brian@bpearson6@fsnet.co.uk;
	Brian Pearson Woodlands Cricket Club -	brian@bpearsone@isnec.co.uk,
	Oakenshaw	
	C/o 567 Bradford Road	
	Cleckheaton	
	BD19 6BU	
	Mrs Patricia Hollings	
	New Horizons	
	1 Greenacre way	
	Wyke	
	Bradford	
	BD12 9DJ	dracupledge@htcoppet.com
	Mrs Virginia Robinson Dracup Lodge Day Nursery	dracuplodge@btconnet.com;
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	Great Horton	
	Bradford	
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	Mr Richard Humpreys	rbh@bbc.bradford.sch.uk;
	Buttershaw Business and	
	Enterprise College	
	Reevey Road West	
	Bradford	
	BD6 3PX Cannon Gordon Dey	thedeyteam@blueyonder.co.uk;
	Holmewood Community	andacyteam soldcyonder.co.dk,
	Council	
	Tong Vicarage	
	74 Holme Wood Road	
	Bradford BD4 9EJ	
	Pastor Warren Evans	whl.evans@gmail.com;
	Bierley	mino ogmanioom,
	Community Association &	
	Bethel Community Church	
	Shetcliffe Lane	
	Bierley	
	Bradford	

CAP REF NO.	Name and Address	Email Address
	BD4 6DF	
	Mr Rob Martin Saltaire Village Society 61 Albert Road Shipley West Yorkshire BD18 4NS	robmartin@phonecoop.coop;
	Revd Cannon Tony Parry New Testament Church of God 34 NecropolisRoad Lidget Green Bradford BD7 2PU	pastor@ntcgbradford.org.uk;
	Mrs Betty Waterhouse Sutton Community Association Sutton Community Centre 51 Kyffin Place BD4 8NB	eawaterhouse@yahoo.co.uk;
	Mrs Carol Woodley Bolton Woods Community Centre Livingstone Road Bolton Woods Bradford BD2 1BD	cazyw@yahoo.co.uk;
	Mr Stan Burston Wyke Christian Fellowship 10 Wyke Lane Wyke Bradford BD12 9BX	hsje6@blueyonder.co.uk;
	Mr William Barraclough Wyke Armature Rugby League Club 9 railway Terrace Low Moor Bradford BD12 0LT	
	Mr David Reynolds South Bradford Community Network	sbcn@talk21.com;

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REF	Name and Address	Eman Address
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	37 SmithAvenue	
	Odsal	
	Bradford	
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	Mr Geoff Twentyman	geoff@twentyman.org.uk;
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	Group	
	13 St Abbs Fold	
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	Mrs Caroline Heward	Caroline.heward@salvationarmy.org.uk;
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	Bradford South & West Live	
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	Salvation Army Buildings	
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	Fairweather Green	
	BD8 0LY	
	Andrew Thorby	thorbya@yahoo.co.uk;
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	Cottingley	
	Bingley	
	West Yorkshire	
	BD16 1RB	the area also del @ heaters all a area.
	Rev. David Kennedy C of E St Johns	therevdavid@hotmail.com;
	St Johns Vicarage	
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	Bierley	
	BD4 6AA	
	David Barry Clark	
	Lidget Green Community	
	Partnership	

REF NO. 3 Church Court Lidget Green Bradford BD7 2LL Mr Frank Kirk 3 Herschel Road Bradford BD8 0QS Mr Brian Rhodes 133 Allerton Road Bradford BD8 0AA Mr Jim Smith Incommunities Trust House 5 New Augustus Street Bradford BD1 5LL Frank.kirk1@btopenworld.com Frank.kirk1@btopenworld.com Jim.smith@incommunities.co.to Jim.smith@incommun	
3 Church Court Lidget Green Bradford BD7 2LL Mr Frank Kirk 3 Herschel Road Bradford BD8 0QS Mr Brian Rhodes 133 Allerton Road Bradford BD8 0AA Mr Jim Smith Incommunities Trust House 5 New Augustus Street Bradford	
Lidget Green Bradford BD7 2LL Mr Frank Kirk 3 Herschel Road Bradford BD8 0QS Mr Brian Rhodes 133 Allerton Road Bradford BD8 0AA Mr Jim Smith Incommunities Trust House 5 New Augustus Street Bradford	
Bradford BD7 2LL Mr Frank Kirk 3 Herschel Road Bradford BD8 0QS Mr Brian Rhodes 133 Allerton Road Bradford BD8 0AA Mr Jim Smith Incommunities Trust House 5 New Augustus Street Bradford	
BD7 2LL Mr Frank Kirk 3 Herschel Road Bradford BD8 0QS Mr Brian Rhodes 133 Allerton Road Bradford BD8 0AA Mr Jim Smith Incommunities Trust House 5 New Augustus Street Bradford	
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3 Herschel Road Bradford BD8 0QS Mr Brian Rhodes 133 Allerton Road Bradford BD8 0AA Mr Jim Smith Incommunities Trust House 5 New Augustus Street Bradford	
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	Mark Williams Miller Homes Limited – Yorkshire Lapwing House Peel Avenue Calder Park Wakefield WF2 7UA	tim.williams@miller.co.uk;
	Mrs Mandy Miller Secretary Mossdale Residents Community Group c/o 5 Chilver Drive Tong BD4 0TS	info@mossdale.org;
	Miss Karen Hodgson Scholemoor Beacon c/p 53 Scholemoor Avenue Bradford BD7 2RU	Karen.hodgson@incommunities.co.uk;
	Mr Andrew Robertson Barnardo's Allergrange Community Service 91 Saffron Drive Allerton Bradford BD15 7NQ	Andy.robertson@barnardos.org.uk;
	Yvonne Oliver Partnership Development Manager Community Centre 102 - 104 Bierley House Avenue Bradford West Yorkshire	yvonne.oliver@Q2regeneration.org.uk;

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	Trish Lambert 43 Beaconsfield Road Clayton Bradford BD14 6LQ	trish@tlctravelltd.co.uk;
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	Simon Artiss Planning Manager Bellway Homes North West Division 2 Alderman Road Liverpool L24 9LR	Simon.artiss@bellway.co.uk;
	Mr Anthony Casson lyss Localities West The Arc Canterbury Youth and community Centre Arum Street Bradford BD5 9LE	
	Martin Walsh Martin Walsh Associates Firth Buildings 99-191 Leeds Road	m.walsh@martinwalshassociates.co.uk;

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	Steve Gibbs Principal Consultant The Arley Consulting Company Ltd Chorleian House 49-51, St Thomas's Rd Chorley Lancs PR7 1JE	Sgibbs@taccl.co.uk;
	Mrs Imogen Scotney Scott Wilson Royal Court Basil Close Chesterfield Derbyshire S41 4SL	Imogen.scotney@scottwilson.com;

8.0 APPENDIX 3 – REPRESENTATIONS

- 8.1 This section contains the all the representations received on the Waste Management DPD: Issues Options as of 1st March 2010.
- 8.2 The 20 respondents are listed below:
 - 1. Yorkshire Wildlife Trust
 - 2. Martin Walsh Associates
 - 3. Lancashire County Council
 - 4. Earth Tech & Skenska
 - 5. Highways Agency
 - 6. West Yorkshire Archaeology Advisory Service
 - 7. P Casey
 - 8. English Heritage
 - 9. Theatres Trust
 - 10. Steeton-with-Eastburn Parish Council
 - 11. Aire Valley Environmental
 - 12. Government Office for Yorkshire and the Humber
 - 13. Yorkshire Forward
 - Burley Parish Council
 - 15. Environment Agency
 - 16. Coal Authority
 - 17. Minerals Planning Group
 - 18. Bradford Wildlife Group
 - 19. Waste Disposal Authority (WDA)
 - 20. Environment and Waste Management Improvement Committee