

Bradford Waste Management DPD: Publication Draft

Statement of Consultation

**Public Consultation
December 2015 – February 2016**

FORWARD

This Statement of Consultation relates to the public consultation that was carried out on the Publication Draft of the Bradford Waste Management DPD in 2015 / 2016 and the responses received as a result.

The Publication Draft consultation formed the final round of public consultation on the Waste Management DPD. The consultation sought to involve interested parties and stakeholders and invite representations on the draft planning policies and development allocations put forward by the council.

This Statement of Consultation provides a link between the representations received and how these have been taken into account and addressed in the DPD Submission Draft document.

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1.0 INTRODUCTION & BACKGROUND

- 1.1 The Planning and Compulsory Purchase Act 2004 brought about a major change to the planning system, in particular to planning policy and how development plans are to be prepared. This means that the adopted Replacement Unitary Development Plan (RUDP) (2005) will, in time, be replaced by the Local Plan (previously Local Development Framework). The Waste Management DPD is being produced as part of the Bradford District Local Plan. When preparing documents which will form part of the Local Plan, the council must carry out public consultation and engage with local communities and stakeholders in order to gauge views on the plan and its soundness. The minimum requirements which all authorities must achieve are set out within the planning regulations.
- 1.2 Planning Authorities are also required to prepare and publish a Statement of Community Involvement (SCI) which explains when and how any public consultations will take place, who will be consulted and what will be done to engage with the community at each stage of the consultation process and also within planning applications. The council is fully committed to community engagement in the delivery of local services and functions. The SCI for Bradford was adopted by the Council on 8th July 2008.
- 1.3 This report contains details of the full consultation process carried out for the Bradford Waste Management DPD Publication Draft, a summary of representations received and how these representations have been taken into account in the preparation of the Submission Draft Draft.
- 1.4 Section 2 of the report sets out the methods of consultation and the programme of events. Section 3 provides a summary of the main issues raised from the consultation responses. Section 4 sets out the next steps for how the Waste Management DPD will progress.
- 1.5 It is considered that this report provides a fair and accurate representation of comments, however some comments have necessarily been summarised. It should be noted that officers work from both these summaries and from the detailed full comments submitted to move forward to the next stage of the Waste Management DPD. Appendix 3 contains a summary of all representations and Bradford Council's responses to the representations received.

Purpose of this document

- 1.6 When preparing the local plan, the council must notify key consultation bodies and stakeholders of the subject of the local plan which the council propose to prepare, invite representations about what the local plan ought to contain and take into account any representation made.
- 1.7 This Statement of Consultation report sets out how the council has involved the community and key stakeholders in the preparation of the Bradford Waste Management DPD. It sets out what was done to consult the different organisations, agencies, and residents of the district, how this met the requirements of the regulations and how it complies with the council's adopted

SCI. It also describes how the results of the consultations have been taken into account in preparing the next stage of the plan – the Publication Draft.

- 1.6 The relevant regulations as set out within the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations are listed below:
- Regulation 17- Application and interpretation of Part 6 (Local plans)
 - Regulation 18- Preparation of a local plan
 - Regulation 19- Publication of a Local Plan
 - Regulation 20- Representations relating to a local plan
 - Regulation 22- Submission of documents and information to the Secretary of State
- 1.7 This report has been prepared to provide a formal record of the consultation which has taken place to accord with Regulation 22 'Submission of documents and information to the Secretary of State'. Regulation 22 requires the submission of a local plan to be accompanied by a statement, setting out the following:
- (i) how those bodies and persons were invited to make representations (Section 2 and Appendix 2)
 - (ii) a summary of the main issues raised by the representations made pursuant to regulation 19 (see Section 3 and Appendix 3)
 - (iii) how any representations made pursuant to regulation 18 have been taken into account (see Section 3)

Bradford Waste Management DPD

- 1.8 The Bradford Waste Management DPD is being produced as part of the Bradford District Local Plan. The Local Plan will be made up of a collection of planning documents that will guide future growth and development for the next 15-20 years. The DPD will set out detailed land uses and direct future development and investment.
- 1.9 There are a number of stages for preparation of the Waste Management DPD; these are highlighted in the list below:
- 1 Pre-production scoping and evidence gathering (2007-2008)
 - 2 Consultation on Issues and Options (2009 – 2010)
 - 3 Preferred Approach (2011)
 - 4 Preferred Approach – Revised Chapter 5 (2011)
 - 3 Consultation on Publication Draft (2015)**
 - 6 Submission to Secretary of State
 - 7 Examination
 - 8 Adoption following an Inspectors report.
- 1.10 The Publication Draft consultation formed the final round of public consultation on the Waste Management DPD. The consultation sought to involve interested parties and stakeholders and invite representations on the key issues and emerging development options put forward by the council. This Statement of Consultation relates to the public consultation that was carried out for the Publication Draft of Waste Management DPD in 2015/16 and the responses received as a result.

2.0 METHODS OF CONSULTATION & EVENTS PROGRAMME

- 2.0.1 The Waste Management DPD presented a final draft plan with policies and proposed allocation sites for public consultation. It was the intention of the council to seek the views of key stakeholders, agencies, community groups and residents with regards to soundness of the policies and proposals presented within the DPD, along with the evidence base which supported the report.
- 2.0.2 Publication Draft Report was taken to the Council's Executive Committee for approval for public consultation on the 13th October 2015 and to Full Council on the 20th October.
- 2.0.3 In line with the SCI and requirements of the planning regulations, the council undertook a planned eight week public consultation on the Preferred Approach draft from December 2015 to February 2016. The consultation period started 14th December and finished on 8th February 2016, covering 8 weeks in total.

2.1 Consultation and Supporting Documents

- 2.1.1 The following documents were produced and made available for the Publication Draft consultation:

- Waste Management DPD Publication Draft
- Engagement Plan
- Bradford Waste Submission Version SA Report
- Site Assessment Paper Publication Draft
- Duty to cooperate Statement
- Bradford Waste Management DPD comment form
- Bradford Waste Management DPD comment form
- Bradford Waste Management DPD Publication Draft Sustainability Appraisal Report
- Bradford Waste Management DPD Publication Draft Sustainability Appraisal Report Annex A – Policy Revision
- Bradford Waste Management DPD Publication Draft Sustainability Appraisal Report Annex B – Site Assessment
- Bradford Waste Management DPD Publication Draft Sustainability Appraisal Report Annex C – Matrices
- Bradford Waste Management DPD Publication Draft Sustainability Appraisal Non-Technical Summary (NTS)

- 2.1.2 Copies of the key consultation documents were placed for inspection at the following deposit locations listed below. Notifications of these locations were given in the consultation letter and on the council's website. Deposit locations were:

- Planning Offices in Bradford (Jacobs Well)
- Ilkley Town Hall

- Council One Stop Shops at Keighley
- Shipley Town Hall
- in the main local libraries in Bradford, Bingley, Keighley and Ilkley

Evidence Base & Supporting Documents

2.1.3 In addition to the above consultation documents, the following reports which form part of the Local Plan's evidence base were made publically available on the Council's Local Plan webpages:

- Affordable Housing Economic Viability Assessment (AHEVA)
- Bradford District Employment Land Review Study
- Bradford District Housing Requirement Study
- Bradford District Retail Study
- Conservation Area Assessments & Management Plans
- Core Strategy Baseline Analysis Study
- District Wide Transport Study
- Draft Settlement Study
- Gypsy and Travellers Accommodation Assessment
- Local Economic Assessment (LEA)
- Local Infrastructure Plan
- Open Space Assessment
- Strategic Flood Risk Assessment Level 1 (SFRA)
- Strategic Housing Land Availability Assessmentn (SHLAA)
- Strategic Housing Market Assessment (SHMA)

2.2 Who was consulted?

2.2.1 Approximately 1,800 stakeholders, members, groups and individuals were invited to make comments to the Publication Draft consultation documents outlined above. The table below indicates those persons or bodies consulted. These are organised in line with the SCI.

Consultees List	Number of consultees
Statutory consultees	100
Previous respondents to Bradford Waste Management DPD consultation	347
Other consultees	39
Councillors	90
LDF Notification List	1564
Total	2140

2.3 How the public and other stakeholders were consulted

2.3.1 The council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the district. The ranges of methods used are outlined below:

2.3.2 A total of 2140 written notifications were sent out on Monday 7th December 2015, either by letter or by email, to individuals, community groups, developers, agents and infrastructure providers in line with the SCI, notifying them of the consultation, how to view the documents and inviting them to make comments before the set deadline. A sample of the letter can be found in Appendix 2.

2.3.3 The table below provides a summary of who was consulted and by what means.

Links to SCI	Consultee	Method of notification
Specific Consultation Bodies	Statutory Bodies	Letter and email
	Town & Parish Councils	
General Consultation Bodies	General Consultees	Email
Other Consultees	Other Consultees	Email
List of Other Organisations and Groups not identified in Planning regulations	Bradford Councillors	Email
	Notification Request	Email
	LDF Newsletter Subscribers	Email
	Previous respondents to DPD consultation	

2.3.4 The Council issued a press release in December following Council Executive approval for public consultation. A copy of this can found in Appendix 2. Local news press / media provided coverage on the Publication Draft consultation. In particular, the Telegraph and Argus ran an article to highlight the draft plan and how to get involved for the local communities. The news article published can be found in Appendix 2. The following newspaper articles were published by the Telegraph and Argus, and Keighley News:

16th September 2015

http://www.thetelegraphandargus.co.uk/news/13764325.Consultation_on_future_waste_sites_to_begin_in_bid_to_boost_recycling/

http://www.keighleynews.co.uk/news/13764325.Consultation_on_future_waste_sites_to_begin_in_bid_to_boost_recycling/

17th December 2015:

http://www.thetelegraphandargus.co.uk/news/14153399.Local_Plan_meeting_in_Keighley/

http://www.keighleynews.co.uk/news/14153399.Local_Plan_meeting_in_Keighley/

2.3.5 The **Council's local plans website** (www.bradford.gov.uk/planningpolicy) was used to facilitate communication of the consultation and the time period. Consultation documents were made available to view and download throughout

the consultation process and details of the technical and area ‘drop-in’ events were advertised. Details of how people could comment on the consultation documents, along with a comment form and online survey were clearly provided. A copy of the webpage can be found in Appendix 2. A link to the Publication Draft consultation was also placed on the council’s main Consultation webpage <http://www.bradford.gov.uk/bmdc/Consultations>.

2.3.6 The use of a revised online survey form was used during the public consultation of the Publication Draft. The use of the new online survey form was considered productive and will be used more widely for parts of the Local Plan such as the Allocations DPD. The Council also trialled a new online interactive map to increase accessibility and the usability of the planning documents. The interactive map also contained links to the online comment form to allow users to more easily make comments on planning policies and proposals put forward in the DPD.

2.3.7 **The November 2015 issue of the LDF Newsletter - *Plan-It Bradford*** was sent out electronically via email to over 1000 subscribers in November 2015 with details of the Publication Draft consultation. This newsletter along with past editions is available to view on the council’s website. Extracts from this newsletter can be found in Appendix 2.

2.3.9 Several **area consultation events** were organised across the Bradford district to allow stakeholders, community groups and residents to come along and find out more about the Draft Area Action Plans and to gain a better understanding of the Local Plan process.

2.3.10 At each of these area events the following were available:

- consultation documentation (as listed in paragraph 2.1.1)
- evidence base documents
- exhibition panels summarising the documents
- officers from the council’s Development Plans Team were available to answer any questions at each event.

2.3.12 The table below outlines the area consultation events which took place:

Date	Time	Area	Venue
Wednesday 6 th January 2016	4pm- 7pm	Keighley	Keighley Town Hall
Friday 8 th January 2016	4pm- 7pm	Shipley	Kirkgate Centre, Shipley
Monday 11 th January 2016	4pm – 7pm	City Centre	City Centre Library, Bradford

2.3.13 The events were well attended and provided the opportunity for interested stakeholders and the public to talk to officers, ask questions and look in detail at the draft policies and proposals in the Waste Management DPD.

2.3.14 Following consultation on the Waste Management DPD Publication Draft, the Council took the decision to re-consult on the Sustainability Appraisal for a period of 6 weeks from 18th March to 29th April. This was Council took this decision on account of the Non-Technical Summary not being published during the consultation of the Publication Draft. All Sustainability Appraisal documents were then published and the same consultation procedure (as stipulated above) for the Publication Draft was then followed.

3. Schedule of Consultation Responses

3.1.1 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

Rep No.	Customer Ref No.	Consultee	Group/Organisation	Agent
1.	0001	Bev Eastell	Local Resident	
2.	0002	Ian Smith	Historic England	
3.	0003	Richard Hall	Natural England	
4.	0004	Helen Ledger	Sport England	
5.	0005	Cathy Fowler	Local Resident	
6.	0006	Sian Levy	Local resident	
7.	0007	Dr Gerard McGowan	Local resident	
8.	0008	Caroline Whitaker	Local resident	
9.	0009	Stephen Mackay	Local Resident	
10.	0010	Sylvia Walker	Local Resident	
11.	0011	Richard Longcake	Bradford Council	
12.	0012	Bev Lambert	Environment Agency	

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>EFW and in particular a policy on Combined Heat and Power readiness which would maximise the use of waste as an energy resource?</p> <p>Information on Defining Residual Waste There is no legal definition of residual waste but here are 3 recent definitions:</p> <p>1. 'Residual Waste' is the definition given to wastes which have been subjected to all reasonably practicable efforts to extract and recover re-usable and recyclable materials -Scottish Parliament briefing.</p> <p>2. Mixed residual waste - This is the waste that is left over when all the recycling possible has been done. This generally means the environmental or economic costs of further separating and cleaning the waste are bigger than any potential benefit of doing so – Energy from waste A guide to the debate February 2014 (revised edition).</p> <p>3. This item is taken from the Waste England and Wales regulations which enact the part of the waste framework directive which requires separate collection of recyclables, the TEEP test (technically, environmentally and economically practicable) is key in determining whether a waste stream can/should be segregated for recycling and therefore helps define what cannot be recycled and is by default residual waste. It is not a definition in its self but it is a good indication of current thinking.</p> <p>The Waste (England and Wales) Regulations 2011 Duties in relation to collection of waste 13.—(1) An establishment or undertaking which collects waste paper, metal, plastic or glass must, from 1st January 2015, take all such measures to ensure separate collection of that waste as are available to the establishment or undertaking in that capacity and are— (a) technically, environmentally and economically practicable; and (b) appropriate to meet the necessary quality standards for the relevant recycling sectors. 3</p> <p>(2) For the avoidance of doubt, co-mingled collection (being the collection together with each other but separately from other waste of waste streams intended for recycling with a view to subsequent separation by type and nature) is a form of separate collection. (3) Every waste collection authority must, when making arrangements for the collection of waste paper, metal, plastic or glass, ensure that those arrangements are by way of separate collection.</p> <p>SITE ALLOCATIONS</p> <p>Environmental Permitting Waste facilities are likely to require an Environmental Permit from the Environment Agency. At this stage, it is difficult to ascertain specific permit requirements given that the end use of these sites has not yet been finalised, but a number of potential options have been noted. It is unlikely that there will be any 'show stoppers' from a permitting viewpoint that would result in a permit not being granted, however, it is recommended that developers enter into discussions with the Environment Agency at an early stage and submit applications for planning permission and permits at the same time to allow full consideration of the proposals.</p>	<p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to the supporting text of the document to encourage developers to enter into discussion with the Environment Agency at an early stage to discuss Environmental Permitting.</p>	<p>No action taken at this time.</p>

GENERAL COMMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
11.	Richard Longcake WDA Bradford Council	<p>Overall satisfied with the document and sites (6) allocations, and support the criteria for considering applications for unallocated sites.</p> <p>I would point out in 2.19 there is now no continued joint working with Calderdale in respect of their residual MSW, as they have now independently contracted for the treatment of this waste. Notwithstanding this, as per W1 there remains the prospect of some joint working between Councils.</p> <p>As shown in 3.8, there is a need to be consistent with terms throughout the document, if MSW is the same as LACW, then it should be either one or the other, in 3.8 we have both.</p> <p>In terms of Table 3, landfill non hazardous, landfill hazardous or hi temp incineration at the stated volumes/tonnages or unlikely to be viable based on the premise of self sufficiency, and will undoubtedly be dealt with at existing facilities in the region/sub region, and at this level the Y&H TAB will have a role to play in ensuring such facilities remain available.</p> <p>In item 6 we support the view re considering unallocated sites and the criteria stated, however, and although we understand to safeguard against the loss of existing allocated sites (WDM 3) the rigid stance taken to resist other forms of development is not supported, a more flexible approach is needed, as it is unlikely the allocated sites will only ever be proposed for just WM facilities.</p> <p>Finally given the transport nature of Bradford, and that of the waste industry in general, road haulage will be the main form of transport, in this respect the document does not emphasise enough the air quality issues in Bradford and the need to use less polluting forms of fuel eg CNG.</p>	<p>Noted.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to the supporting text of the document to correct this factual error.</p> <p>Noted.</p> <p>Whilst not considered a matter of soundness a minor change could be made to the supporting text of the document to correct this factual error.</p> <p>Noted.</p> <p>Noted.</p> <p>The Council considers the policy flexible enough to respond to a range of circumstances, as stipulated within the exceptional circumstances of the policy.</p> <p>Noted.</p> <p>Policy WDM2 point i) stipulates “The applicant can demonstrate the mitigation of waste treatment and HGV associated emissions including the consideration of cleaner fuels and technologies capable of reducing emissions”</p>	<p>No action taken.</p> <p>No action taken at this time.</p> <p>No action taken at this time.</p> <p>No action taken.</p> <p>No action taken.</p> <p>No action taken.</p>

VISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire)	The Core Strategy recognises the important contribution which Bradford’s environmental assets make to its distinctive character, to the quality of life of its communities and to its economic well-being. It is important that the strategy for waste management is delivered in a manner which safeguards these	<p>Noted.</p> <p>Noted.</p>	<p>No action taken.</p> <p>No action taken at this time.</p>

VISION				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Historic England	assets (and also the amenities of those who might be affected by any waste developments). Since these considerations are referred to within Objective 3, they ought, also, to be included as part of the overarching Vision. Suggested Change - Vision, add to the end:- This will be undertaken in a manner which safeguards the District's environment assets and protects the amenities of its communities."	Whilst not considered a matter of soundness a minor change could be made to Vision to clarify the importance of safeguarding environmental assets and the protection of their amenity.	

OBJECTIVES				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Objective 3 – Sound -We support the intention that the expansion of existing facilities and the development of new waste facilities will be delivered in a manner which protects the District's environmental assets. The Core Strategy recognises the important contribution which Bradford's environmental assets make to its distinctive character, to the quality of life of its communities and to its economic well-being. It is important that the strategy for waste management is delivered in a manner which safeguards these assets.	Noted. The Council welcomes Historic England's support.	No action taken.

POLICY W1: CROSS BOUNDARY WORKING				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

POLICY W2: BRADFORD'S FUTURE WASTE CAPACITY REQUIREMENTS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

POLICY W3: PROPOSED WASTE SITE ALLOCATIONS				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

SITE WM1 (FORMERLY SITE 1): PRINCEROYD WAY, INGLEBY ROAD, LISTERHILLS (2.1 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
12.	Bev Lambert Environment Agency	Site WM1: Princeroyd Way, Ingleby Road, Listerhills Flood risk As identified in the proposal statement, this site lies partially within flood zone 3. We note that the 'mitigation requirements' identifies the need to take a sequential approach to the site layout to avoid any development within the flood zone, and the requirement for proposals to be accompanied by a flood risk assessment. We fully support this position. Environmental Permit considerations If an anaerobic digester is proposed on this site, and if it is within 250m of residential properties we	Noted. The Council welcomes the Environment Agency's support. Noted.	No action taken.

SITE WM1 (FORMERLY SITE 1): PRINCEROYD WAY, INGLEBY ROAD, LISTERHILLS (2.1 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		would need to look at whether odours can be adequately managed through the use of closed system and/or appropriate ventilation. Also, if it is within 10m of a watercourse we will need to look at whether surface run-off can be satisfactorily managed to avoid contamination of the watercourse.	The Council considers the issues raised in this part of the representation have been addressed through the allocation statement and policy WDM2. However, should the EA still consider more detailed guidance is required in the allocation statement, the Council will consider modifications if necessary.	

SITE WM2 (FORMERLY SITE 11) - RIPLEY ROAD, BOWLING (2.35 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Site WM2 - – Ripley Road, Bowling – Sound. This site lies 250 metres from the boundary of the Grade II Registered Historic Park and Garden at Bowling Park. Therefore we welcome the required that applications for the development of this area would need to demonstrate that they would not harm the setting of this landscape.	Noted. The Council welcomes Historic England's support.	No action taken.

SITE WM3 (FORMERLY SITE 78) - AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY (2.8 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
1.	Bev Eastell Resident	I strongly object to the fore mentioned due to the following concerns: The effect on residential amenity including noise, disturbance and smells. The said site may be brown field with low lying industrial units in close proximity but the vast majority of the area is green belt with pockets of residential housing including an elderly residential home and a day nursery. The whole development will have a detrimental impact not only on the environment but to the quality of peoples lives who live in and around the surrounding areas. The disturbance from the plant that operates 24/7 will no doubt pollute the area with noise and smells and not to mention the plume from the 100ft chimney that will be emitted from the premises no matter how stringent the measures will be to minimise these. The proposed design and structure plus the plume from the chimney will dominate the area. The height, depth and mass of the development is out of keeping and out of character for its proposed locality and will undoubtedly be a blot of the landscape that will be seen from many a vantage point. The effect on heritage assets. East Riddlesden Hall, a Grade 1 listed building of national importance and the jewel in Keighley's heritage crown is approximately 500 metres away from the proposed development. The National Trust have raised objections on the basis that the said development would cause significant harm to the Grade 1 listed buildings setting even when screened by the proposed additional planting. This planting will introduce further elements of heritage harm and will be out of character with the historic role, function and appearance of this heritage asset. East Riddlesden Hall and its setting is an historical and treasured facility that should be protected and conserved for present and future generations to enjoy. Highway safety.	Noted. The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	No action taken.

SITE WM3 (FORMERLY SITE 78) - AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY (2.8 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>The proposed development will be situated off the Westbound carriageway on the A650 Aire valley road (opposite Marley playing fields) and will only be accessible from this carriageway. Under the proposed plans lorries will enter and exit the premises via deceleration and acceleration lanes on the A650. Due to the development only being accessible via the Westbound carriageway, lorries will have to go around the roundabouts at either end of this section of the A650 dependant on where the said lorries originate from. This will increase traffic heading East and going West and this stretch of road is already very busy and congested at peak times due to it being the main route from Bingley to Keighley and visa versa. This is a serious highway safety matter because not only will motorists have to negotiate lorries entering and exiting the premises, they will have to deal with the increase of traffic too and in the past numerous accidents have already happened on this busy stretch of road.</p> <p>Effects on health. There is no guarantee that this kind of development won't have an adverse and detrimental effect on peoples health in the future. This includes residents not only in the immediate vicinity but surrounding areas also. The area of possible contamination could be vast dependant on which way the wind blows. Potentially thousands of people from across the board could be affected. In a damning government report by professor J C Dearden (waste 69) on incinerators http://www.parliament.the-stationery-office.co.uk/pa/cm200910/cmselect/cmenvfru/230/230we57.htm concludes "evidence is accumulating that low, even very low, levels of dioxins and other toxicants can carry very serious health risks".</p> <p><u>Suitability of site allocation.</u> I strongly feel that the location of the planned site is totally unsuitable due to the fact that this is a valley bottom and a natural flood plain. Even though it is stated that flooding isn't a major risk factor, future flooding of this site should be taken into consideration especially after 2015 boxing day floods that catastrophically hit the Aire Valley (please see the attached photo of the flooded Marley Playing Fields, which is directly opposite the site). This was the third time in 6 weeks that Marley Playing Fields had flooded but according to the Environmental Agency, Marley is outside the flood zone area. If Marley is outside the flood zone area (but clearly floods) then there is a definite higher risk that the said site could flood also. Even the higher volume of excess surface water on this site could potentially lead to an environmental disaster with contaminated water getting into the natural water source. Also on many occasions a thick mist settles in the valley (see attached photo). On days like this it would be a concern to say the least, that hazardous emissions from the stack (that runs 24/7) would not easily get up into the atmosphere and instead linger over the valley bottom, causing a potentially toxic environment.</p> <p>The land on which this "energy from waste facility" is to be built is also possibly contaminated from past uses and natural contamination such as asbestos, arsenic etc. These could pose health risks and financial burdens to all concerned. Not only that this site currently houses high pressured mains gas pipes around its perimeter, surely even contemplating such a build is a disaster waiting to happen!!!</p> <p>I conclude that the use of this site for the "energy from waste facility" should be reconsidered and wittingly placing such a controversial facility within the proposed location is surely against basic human rights. This kind of waste management should not be built in the 21st century and this site is totally unsuitable. Nowadays there are other methods available that are friendlier to the environment</p>		

SITE WM3 (FORMERLY SITE 78) - AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY (2.8 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		and economically more beneficial to their surroundings. The mythical boost to Keighley's economy is not an acceptable compromise, especially when you take into consideration the detrimental impact this facility will have on thousands of peoples lives. Serious health issues whether they are small is a risk too far in my opinion and people's health should not be gambled on. Highway safety including the increase of industrial traffic within close proximity to the day nursery is also a major concern so on this occasion I feel the cons definitely out way the pros.		
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Site WM3, - Aire Valley Road, Worth Village – Sound. This site lies 500 metres to the south of East Riddlesden Hall, a Grade I Listed Building which has seven other Grade II Listed Buildings surrounding it. Therefore we welcome the required that applications for the development of this area would need to demonstrate that they would not harm the setting of these assets.	Noted. The Council welcomes Historic England's support.	No action taken.
5.	Cathy Fowler Resident	I am writing in response to the above development plan. Whilst I welcome the vision to achieve net self sufficiency for the district in waste management, I am concerned about the plan for the Keighley site - namely that this development will increase levels of HGV traffic through the Shipley area where I live. Air pollution levels are already high in this area and a number of schools and homes are close to the relevant roads. The impact of any increase of traffic will have a detrimental effect on the health of our population and consequently on the provision of health services. We should be looking at ways to reduce the existing pollution levels rather than increase these.	Noted. The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	No action taken.
6.	Sian Levy Resident	From 13/04217/FUL Report of the Assistant Director (Planning, Transportation & Highways) to the meeting of Regulatory and Appeals Committee held on 3 April 2014. Transport Assessment 9:30 "The site will be accessed off the A650 Airevalley Road with the number of HGV movements at a maximum of 70 HGV movements per day, averaging 6.6 movements perhour. On Saturdays 38 HGV movements, averaging 8.4 movements per hour. The access will be re-configured and highway improvements made." I understand that conditions (20, 21, 22 and 26) were imposed on access improvements and acceleration and deceleration lanes to be added to the A650. However there is no mention of how the extra HGV traffic will affect the flow of traffic on the A650. The HGV Vehicles will be required to leave left down the dual carriage way towards Keighley and will be moving between 7am and 6pm Monday to Friday, which covers both rush hours and the 38 HGV's adding to Saturday traffic up until 1pm, when there is extra traffic for the sports fields opposite the site. Traffic is already heavy with heavy tail backs in this area due to the roundabout junction slowing traffic. Sometimes it takes 20 minutes to get through this area and the extra traffic generated by this power station will add to this problem. Suggested Change - I can not see how the number of HGV vehicles accessing this site could be	Noted. The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	No action taken.

SITE WM3 (FORMERLY SITE 78) - AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY (2.8 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>altered. I suggest that -</p> <ul style="list-style-type: none"> * an alternative site is found with better access * an alternative method of delivering waste to the site is found. There is a railway line adjacent to the site. 		
7.	<p>Dr Gerard McGowan</p> <p>Resident</p>	<p>Access to the site on A650 does not take into consideration that this road is fed by narrower unsuitable roads and the increase in HGV use would increase the problems seen with congestion as there are several bottlenecks to existing traffic. These bottlenecks, for example at the Bradford Rd roundabout & Saltaire roundabout would only be further blocked by additional HGV use. Any proposed site for such heavy traffic needs better road networks that can handle increased traffic. Although there needs to be an improvement to CBMDC waste management due to over use of land fill, this incinerator is not a viable option as it doesn't meet the minimum criteria for sustainability. Recent studies have shown that a minimum of 1000 tonnes of waste must be incinerated per day for the costs of running the site and managing the toxins produced. The costs of building and maintaining effective & efficient toxic emission control is significantly greater than building the incinerator. This does not appear to have been effectively considered in the plans.</p> <p>There are alternatives to land fill & incineration. Improved recycling is a must. I personally witness in my neighbourhood locals who do not recycle any waste. Their household waste includes glass, plastic, paper, cardboard, tins and textiles. All are easily recycled and there are two council recycle centres within easy reach, plus public recycling easily available at the local supermarkets.</p> <p>The main problems with recycling is there is a lack of understanding and a lack of motivation. Making households responsible for recycling and introducing fines for households that do not separate waste as is done in other European countries may become a necessity if councils are to reach the 70% recycle targets required by EU by 2030.</p> <p>Suggested Change - I do not think an incinerator is a viable method of effective waste management unless it has in excess of 1000 tonnes incinerated per day. The incinerator would also need to manage all toxins produced by incineration including especially the heavy metals in off gassing. The site of any such 'viable' incinerator must have good transport networks. Why can railways not be used for transportation? Having waste transported via railways to an suitable site that was fed by more of west Yorkshire councils or even all of Yorkshire councils would make more financial and environmental sense. Using HGVs is merely creating a significantly greater problem of traffic congestion and increased pollution from the diesel engines thundering through Bradford & Keighley.</p>	<p>Noted.</p> <p>The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.</p>	No action taken.
8.	<p>Caroline Whitaker</p> <p>Resident</p>	<p>From 13/04217/FUL Report of the Assistant Director (Planning, Transportation & Highways) to the meeting of Regulatory and Appeals Committee held on 3 April 2014 Transport Assessment 9:30</p> <p>"The site will be accessed off the A650 Airevalley Road with the number of HGV movements at a maximum of 70 HGV movements per day, averaging 6.6 movements perhour. On Saturdays 38 HGV movements, averaging 8.4 movements per hour. The access will be re-configured and highway improvements made."</p> <p>I understand that conditions (20, 21, 22 and 26) were imposed on access improvements and acceleration and deceleration lanes to be added to the A650. However there is no mention of how the extra HGV traffic will affect the flow of traffic on the A650. The HGV Vehicles will be required to leave left down the dual carriage way towards Keighley and will be moving between 7am and 6pm Monday to Friday, which covers both rush hours and the 38 HGV's adding to Saturday traffic up until 1pm,</p>	<p>Noted.</p> <p>The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated</p>	No action taken.

SITE WM3 (FORMERLY SITE 78) - AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY (2.8 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>when there is extra traffic for the sports fields opposite the site. Traffic is already heavy with heavy tail backs in this area due to the roundabout junction slowing traffic. Sometimes it takes 20 minutes to get through this area and the extra traffic generated by this power station will add to this problem.</p> <p>Suggested Change - I can not see how the number of HGV vehicles accessing this site could be altered. I suggest that - * an alternative site is found with better access or * an alternative method of delivering waste to the site. There is a railway line adjacent to the site.</p>	that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	
9.	Stephen Mackay Resident	<p>From 13/04217/FUL Report of the Assistant Director (Planning,Transportation & Highways) to the meeting of Regulatory and Appeals Committee held on 3 April 2014 Transport Assessment 9:30</p> <p>"The site will be accessed off the A650 Airevalley Road with the number of HGV movements at a maximum of 70 HGV movements per day, averaging 6.6 movements perhour. On Saturdays 38 HGV movements, averaging 8.4 movements per hour. The access will be re-configured and highway improvements made."</p> <p>I understand that conditions (20, 21, 22 and 26) were imposed on access improvements and acceleration and deceleration lanes to be added to the A650. However there is no mention of how the extra HGV traffic will affect the flow of traffic on the A650. The HGV Vehicles will be required to leave left down the dual carriage way towards Keighley and will be moving between 7am and 6pm Monday to Friday, which covers both rush hours and the 38 HGV's adding to Saturday traffic up until 1pm, when there is extra traffic for the sports fields opposite the site.</p> <p>Traffic is already heavy with heavy tail backs in this area due to the roundabout junction slowing traffic. Sometimes it takes 20 minutes to get through this area and the extra traffic generated by this power station will add to this problem. Furthermore the Traffic will originate from the east of the site from Shipley down the dual carriageway which merges into a single carriageway road and is heavily congested through Saltaire and Shipley residential areas, for most of the working day period and saturdays and an additional large HGV every few minutes in each direction would exacerbate the traffic problems in this area.</p> <p>Suggested Change - I can not see how the number of HGV vehicles accessing this site could be altered. I suggest that an alternative site is found with better access both in the immediate site vicinity and in the wider road network Movement of waste materials on the public highway is inappropriate due to the poor road access from Bradford (and Leeds). The construction of the long mooted extension of the Airedale trunk road A650 past Shipley to link with the Bradford Canal Road would help minimise the problem in the broader road network but in the immediate site locality a more ambitious site access involving a flyover crossing the road so that vehicles exiting the site could enter the A650 travelling in the direction of Bradford...OR an alternative method of delivering waste to the site is found. There is a railway line adjacent to the site.</p>	<p>Noted.</p> <p>The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.</p>	No action taken.
10.	Sylvia Walker Resident	<p>WM3 - Aire Valley Incinerator - The same sort of plant was proposed for Bradford in Bowling back lane but was deemed to be to toxic.The site at Silsden does not meet the environmental, economic and social requirements. A waste disposal incinerator positioned on the proposed site, would be a violation of our right to breather clean, fresh air. These plants are not convincing in providing `clean energy`. `Toxic`. Any</p>	<p>Noted.</p> <p>The Council considers the issues raised within this representation are already covered under 'Mitigation Measures'</p>	No action taken.

SITE WM3 (FORMERLY SITE 78) - AIRE VALLEY ROAD, WORTH VILLAGE, KEIGHLEY (2.8 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>future plants cannot be placed in residential areas – it is far, far too damaging to health.</p> <p>- Access would be via the already badly congested Aire Valley road network,building these kind of plants in `built up areas` just does not work!</p> <p>- I understand that some of the waste to be `burnt` is plastic? This certainly would produce toxic fumes; and why, why, why – is this not being – healthily – recycled? Please, please, please – think again.</p>	<p>within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.</p>	

SITE WM4 (FORMERLY SITE 92) - BOWLING BACK LANE HOUSEHOLD WASTE COLLECTION AND RECYCLING SITE (4.27 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

SITE WM5 (FORMERLY SITE 104) - MERRYDALE ROAD, EUROWAY (2.0 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	<p>Bev Lambert</p> <p>Environment Agency</p>	<p>Environmental Permit considerations</p> <p>If pyrolysis and gasification is the end use on this site, it should be noted that the following comments should be noted. This site is within 10km of the South Pennine Moor SAC / SPA so and developer would have to show that it does not have a significant impact on this SAC/SPA. In addition the site is within 2km of the nearest AQMA so would also need to consider its impact on that area.</p>	<p>Noted.</p> <p>The Council has reassessed the distance Site WM5 is from the South Pennine Moors SPA / SAC and found it is not within 10km of the protected site. The Council's Habitats Regulations Assessment Screening Assessment (June 2012) did not consider the site to have a significant impact upon the South Pennine Moors SPA / SAC.</p> <p>The Council has reassessed the distance Site WM5 is from the nearest AQMA (Junction of Manchester Road and Mayo Avenue) and found it is not within 2km of the AQMA.</p> <p>Policy WDM2 also contains a raft of policy criteria the minimise the environmental impacts of proposed waste management facilities, but specifically stating:</p> <p>"The applicant can demonstrate the mitigation of waste treatment and HGV</p>	<p>No action taken.</p>

SITE WM5 (FORMERLY SITE 104) - MERRYDALE ROAD, EUROWAY (2.0 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
			associated emissions including the consideration of cleaner fuels and technologies capable of reducing emissions." The Council consider this adequate mitigation for offsetting any potential impact through increases in Nitrogen Dioxide levels resulting from of the site upon the AQMA. The Council is also committed to achieving the objectives of the Low Emission Strategy through the Waste Management DPD, as stated the document.	

SITE WM6 (FORMERLY SITE 121) - STEEL STOCK AND SCRAPOLDERS SITE, BIRKSHALL LANE (4.1 HA)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Bev Lambert Environment Agency	Environmental Permit considerations In relation to any proposals for use of the site for anaerobic digestion, this site is located within 250m of residential properties therefore we would need to consider whether odours can be adequately managed through the use of closed system and/or appropriate ventilation.	The Council considers the issues raised within this representation are already covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM5. In addition to this, Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	No action taken.

POLICY W4: SITES FOR CONSTRUCTION, DEMOLITION AND EXCAVATION WASTE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Policy W4 to W7 – Factual correction - The final Paragraph of all these Policies should refer to Section 6 not Section 7 - Amend the reference to Section 6 in the final Paragraph of Policies W4 to W7 to read section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.
12.	Bev Lambert Environment Agency	Policies W4, S5, W6 and W7 all state "...proposals must comply with the specific Waste Development Management policies set out in Section 7...". We believe this to be an error as Section 7 relates to delivery and monitoring and does not contain any policies. Paragraph 4.5 also refers to the policies being in Section 7.	Noted. Whilst not considered a matter of soundness a minor change could be	No action taken at this time.

POLICY W4: SITES FOR CONSTRUCTION, DEMOLITION AND EXCAVATION WASTE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
			made to correct any factual errors.	

POLICY W5: SITES FOR AGRICULTURAL WASTE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Policy W4 to W7 – Factual correction - The final Paragraph of all these Policies should refer to Section 6 not Section 7 - Amend the reference to Section 6 in the final Paragraph of Policies W4 to W7 to read section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.
12.	Bev Lambert Environment Agency	Policies W4, S5, W6 and W7 all state "...proposals must comply with the specific Waste Development Management policies set out in Section 7...". We believe this to be an error as Section 7 relates to delivery and monitoring and does not contain any policies. Paragraph 4.5 also refers to the policies being in Section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.

POLICY W6: SITES FOR HAZARDOUS WASTE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Policy W4 to W7 – Factual correction - The final Paragraph of all these Policies should refer to Section 6 not Section 7 - Amend the reference to Section 6 in the final Paragraph of Policies W4 to W7 to read section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.
12.	Bev Lambert Environment Agency	Policies W4, S5, W6 and W7 all state "...proposals must comply with the specific Waste Development Management policies set out in Section 7...". We believe this to be an error as Section 7 relates to delivery and monitoring and does not contain any policies. Paragraph 4.5 also refers to the policies being in Section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.

POLICY W7: SITES FOR RESIDUAL WASTE FOR FINAL DISPOSAL (I.E LANDFILL)				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Policy W4 to W7 – Factual correction - The final Paragraph of all these Policies should refer to Section 6 not Section 7 - Amend the reference to Section 6 in the final Paragraph of Policies W4 to W7 to read section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.
12.	Bev Lambert Environment Agency	Policies W4, S5, W6 and W7 all state "...proposals must comply with the specific Waste Development Management policies set out in Section 7...". We believe this to be an error as Section 7 relates to delivery and monitoring and does not contain any policies. Paragraph 4.5 also refers to the policies being in Section 7.	Noted. Whilst not considered a matter of soundness a minor change could be made to correct any factual errors.	No action taken at this time.

POLICY WDM1: UNALLOCATED SITES				
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Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

POLICY WDM 2: ASSESSING ALL APPLICATIONS FOR NEW AND EXPANDED WASTE MANAGEMENT FACILITIES

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Policy WDM2 – Sound. We support this Policy particularly those aspects which relate to:- · ensuring that such developments will not significantly affect the historic environment · requiring applicants to demonstrate that the impact upon areas of landscape, historic or architectural interest will be minimised · requiring applicants to submit a Heritage Statement with their planning applications · the design, siting, external appearance of such developments being of a scale, mass, form and character appropriate to its location and landscape setting. The District has a rich historic environment including one of Yorkshire’s two World Heritage Sites. These make an important contribution to the distinctive character of the area, to the quality of life of its communities and to its economic well-being. It is essential, therefore, that the impact of any potential waste developments is appropriately evaluated and that any harm to the significance of these assets is minimised.	Bradford Council welcomes Historic England’s support.	No action taken.
11.	Richard Longcake WDA Bradford Council	Re WDM 2, and sustainable development standards, Breeam is mentioned, however this may be more suited to accommodation development rather than WM which is more industrial, where Ceequal may prove a better fit.	Noted. Whilst not considered a matter of soundness a minor change could be made to a more relevant sustainable construction code.	No action taken at this time.

POLICY WDM3: APPLICATIONS RESULTING IN THE LOSS OF A PROPOSED OR EXISTING WASTE MANAGEMENT FACILITY

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

POLICY WDM4: WASTE MANAGEMENT WITHIN DEVELOPMENT

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

POLICY WDM5: LANDFILL DEVELOPMENT FOR FINAL DISPOSAL OF RESIDUAL WASTE

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
2.	Ian Smith Planning Adviser (Yorkshire) Historic England	Policy WDM5 – Sound. We support this Policy particularly the requirement:- · for applicants to demonstrate that any residual landfill developments will minimise harm to protected landscapes or the historic environment. · that the design, siting, external appearance of buildings and structures should be of a scale, mass, form and character appropriate to its location and landscape setting. The District has a rich historic environment including one of Yorkshire’s two World Heritage Sites. These make an important contribution to the distinctive character of the area, to the quality of life of	The Council Welcomes Historic England’s support.	

POLICY WDM5: LANDFILL DEVELOPMENT FOR FINAL DISPOSAL OF RESIDUAL WASTE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		its communities and to its economic well-being. It is essential, therefore, that the impact of any potential waste developments is appropriately evaluated and that any harm to the significance of these assets is minimised.		
	Bev Lambert Environment Agency	We request the addition of the following points in this policy in order to ensure potential impacts of landfill development on controlled waters is taken into full account: Proposals for new or expanded landfill developments will be permitted provided: - they comply with Environment Agency Landfill Location Position Statement - they are not in close proximity to a private potable water supply	Noted. Whilst not considered a matter of soundness a minor change could be made to Policy WDM5 to addresses the points raised in this part of the Environment Agency's representation.	No action taken at this time.

MONITORING AND DELIVERY				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATIONS RECEIVED		

EVIDENCE BASE				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
	Bev Lambert Environment Agency	Site Assessment The site assessment paper makes little, if any, reference to sensitive environmental receptors, in particular, controlled waters and drinking water abstractions. We therefore request the following additions: Table 1: Environmental and Heritage absolute constraints - this should include Source Protection Zones, and private potable abstractions 5.11 Location - this should include a reference to the Environment Agency Landfill Location Position Statement 5.13 Sensitive Uses - this should include proximity to potable abstractions as a sensitive use	Noted. There are currently no Source Protection Zones within Bradford District. In regards to the impact of 'private potable abstractions', there is currently very limited information relating to the location of these sites. The primary waste management facility type to which impacts upon private potable abstractions is landfill. The Council is currently not allocating sites for landfill development and thus the site assessment does not take this into account. There is also currently very limited information relating to the location of these abstraction sites. The Council consider the impact upon the abstraction sites may potentially be better assessed on a site by site basis. Therefore Whilst not considered a matter of soundness a minor change could be made to Policy WDM2 to addresses the points raised in this part	No action taken at this time.

EVIDENCE BASE				
Rep ID	Name / Organisation	Summary of Representation	Council Response of the Environment Agency's representation.	Action(s) Required

SUSTAINABILITY APPRAISAL				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
3.	Richard Hall Natural England	<p>Natural England notes that the draft plan does not appear to be supported by a updated version of the Habitats Regulations Assessment (HRA) on the Council's website. The Sustainability Appraisal contains a references to it where it states [URL to be provided by Bradford Council]. It is important that the HRA is available to support this DPD, without which the plan might be deemed not to be sound.</p> <p>Section 1.2 of the Sustainability Appraisal addresses the findings of the HRA. It recognises that '<i>The HRA has concluded that an adverse effect could occur on the component site of the South Pennine Moors SPA/SAC (locally called Rombald's Moor) in connection with the inclusion of 'Site 78 – Aire Valley Road, Worth Village, Keighley' within Policy W6: Proposed Waste Site Allocations. This site is identified within Policy W6 as being suitable for waste management facilities and the supporting text identifies it as a potential location for a 'Pyrolysis and Gasification Facility'. The supporting text, which provides details about this site, does not refer to the HRA or AA and the potential for combustion processes on this site to lead to an adverse effect on nearby European designated sites, which was identified following an air quality assessment, the findings of which are presented within Bradford Metropolitan District Council Waste Management DPD Habitats Regulations Assessment (ENVIRON UK Ltd, November 2012). It has therefore been concluded in the HRA that Site 78 may not be suitable for a waste management use which uses combustion processes and it has been recommended that the plan is amended to reflect that this use should not be identified as being suitable for Site 78.</i></p> <p><i>Alternative sites within the Plan Area should instead be identified for waste management use using combustion process, if it is necessary to provide such a facility within the District.</i></p> <p><i>As the Bradford Waste Management DPD Publication draft is currently worded, it cannot be concluded that an adverse effect on European designated sites will not occur as a result of the plan.'</i></p> <p>This is a serious concern as the DPD still states that site 78 is suitable for a range of uses including 'Pyrolysis and Gasification Facility'. It goes on to state that the site has an extant planning permission for a plant to recover energy from Waste 13/04217/FUL. It is important for the plan to address this issue and clarify whether the planning permission granted in 2013 for the plant to recover energy from Waste 13/04217/FUL includes gasification or pyrolysis.</p> <p>More generally the absence of the final HRA is a concern as it does not enable Natural England to review its conclusions and findings for the DPD as a whole.</p>	<p>Mitigation Requirements of the site allocation statement for Site WM3 (Formerly 78) stipulates "When assessing the environmental impacts of any proposed development on the site, the applicant must take into account any ecological impacts upon the surrounding South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation Area (SAC)."</p> <p>This is further reinforced through the environmental protection through Policy WDM2.</p>	No action taken.
	Bev Lambert Environment Agency	<p>Overall we are satisfied with the report but have the following points to make.</p> <p>Paragraph 4.1 Relationship with other plans and programmes</p> <p>The following appear to have been missed and should be included:</p> <p>☐ Waste Management Plan for England December 2013 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810-pb14100-waste-management-plan-20131213.pdf</p>	<p>Noted.</p> <p>The Council acknowledges the guidance referenced in the representation and will take note within the Sustainability Appraisal of the Submission Draft.</p>	See Sustainability Appraisal of Waste Management DPD Submission Draft 2016.

SUSTAINABILITY APPRAISAL				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>Energy from waste A guide to the debate February 2014 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/284612/pb14130-energy-waste-201402.pdf</p> <p>The section on the Waste Framework Directive does not mention that there is an explicit section in the directive on waste hierarchy and separate collection of dry recyclables which is likely to have a bearing on how waste is collected and processed. We recommend a reference is included.</p> <p>WATER FRAMEWORK DIRECTIVE Very little (if any) reference has been made to available information from the Humber River Basin Management Plan and we are concerned that the presumptions that current conditions (when these do not appear to be known) will prevail, particularly as the Water Framework Directive requires achievement of good ecological status of waterbodies. To address this, we have the following comments.</p> <p>Table 4.1: SA Baseline Summary and Future Baseline SA Objective: Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites. Under column 'Summary of Baseline Data', we would like to see the following sentence deleted: In terms of water quality, it is more likely to be poor or bad in the urban areas (Bradford and the becks to the south of the District). The Aire catchment tends to have better water quality. We suggest the following paragraph could be added instead: Rivers and streams are now assessed in accordance with standards developed under the Water Framework Directive. From monitoring carried out by the Environment Agency, levels of possible polluting substances are almost all meeting WFD quality standards in Bradford district. The only exception for this is phosphate arising from sewage treatment of rural land run-off. However the standard for phosphate is very low and these phosphate failures seldom have any environmental impact. Column headed: 'Future Baseline without the Waste Management DPD', remove the following: The future water quality of the District's watercourses is unknown. It is assumed that the current conditions will prevail and it is likely to be poor or bad in the urban areas (Bradford and the becks to the south of the District) but better quality within the River Aire catchment. Which could be replaced by the following paragraphs: Objectives for river water quality are prescribed in the statutory Humber River Basin Management plan 2015, to which Bradford Council is required to have regard throughout its activities. Any deterioration in the current condition of watercourses in Bradford is likely to be contrary to the objectives of the plan and may come under EU scrutiny. The WFD also assesses the physical nature of watercourses and notifiable deterioration in the WFD status of Bradford's watercourses could arise from regeneration or new development.</p> <p>Table 4.2: SA Framework Topic – Air, Soil and Water Quality The document does not demonstrate that consideration has been given to the potential impacts on waterbodies. With that in mind, we make the following comments: Column 'Draft Waste DPD Sustainability Appraisal Objectives' It should be noted that statutory objectives for watercourses in Bradford are given in the Humber River Basin Management plan 2015. This document and the objectives therein have been formally</p>		

SUSTAINABILITY APPRAISAL				
Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		<p>adopted by Government. Column 'Appraisal Questions. Will the plan...' We recommend the addition of the following question: ... prevent any deterioration and promote the continued improvement of the district's watercourses in line with objectives in the statutory Humber river basin management plan?</p> <p>Table 5.3: The reasons for selecting the policy approaches Issue 4: Locational Criteria for Municipal Solid Waste and Commercial and Industrial Waste Management Facilities ☐ <i>Physical constraints and delivery:</i> information on Flood Risk Zones (1, 2, & 3) should be noted. Sensitivity of nearby watercourses should be noted.</p> <p>We request that the either the word 'watercourses' is changed to 'waterbodies' or an additional reference is made to 'groundwater'.</p>		

Department of Regeneration
Development Plans
2nd Floor (South) Jacobs Well
Nelson Street
Bradford
BD1 5RW

Tel: (01274) 433679

Email: planning.policy@bradford.gov.uk

Date: Monday 14th December 2015

Dear Sir / Madam,

RE: LOCAL PLAN FOR THE BRADFORD DISTRICT

- **Waste Management Development Plan Document**
- **Bradford City Centre Area Action Plan**
- **Shipley and Canal Road Corridor Area Action Plan**

- PUBLICATION DRAFT (REGULATION 18 & 19)

I am writing to you as a statutory consultee or because of your previous interest in the Local Plan for the Bradford District. On 20th October 2015 the Council approved the Development Plans listed above for submission to the Secretary of State for public examination by an independent Planning Inspector. In advance of submission, the Publication Draft Development Plans will be published formally for representations, in line with the relevant Regulations on **Monday 14th December 2015**.

The Development Plans listed above set out proposed sites and policies which will provide the planning policy framework for determining future planning applications in these areas to 2030

Aim of this consultation

This consultation seeks your written representation(s) on the Publication Draft before the Council formally submits the documents to the Government for examination. In particular comments are sought in relation to the ‘**soundness**’ of the plans, including whether the plans have been prepared in accordance with the **legal requirements** and fulfil the **Duty to Co-operate**.

Your comments are invited on these Publication Draft Development Plan Documents during the period of consultation, which runs for 8 weeks until Monday 8th February 2016 (1pm).

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities such as email to make their responses in this way. Representations can be made using the Representation Form available online at www.bradford.gov.uk/planningpolicy or by email to the address planning.policy@bradford.gov.uk

As well as electronic representations the Council will also accept responses by post to Development Plans, City of Bradford Metropolitan District Council, 2nd Floor South, Jacobs Well, Nelson Street, Bradford BD1 5RW

All comments should be with the Council by 1pm on Monday 8th February 2016.

Your personal details and comments cannot be kept confidential and will be published and submitted to the Secretary of State alongside each of the Development Plans for public examination by an independent Planning Inspector.

Any representation submitted may be accompanied by a request to be notified at a specified address of the submission of the relevant Development Plan for independent examination; of the publication of the recommendations of the person appointed to carry out the examination on the Core Strategy; and on the adoption of the Core Strategy.

The Development Plans listed have been subject to the following assessments: Sustainability Appraisal and Habitat Regulations Assessment, Equality Impact Assessment and Health Impact Assessment.

Availability of Documents

All three development plans and supporting documents will be available to view on the Council's website at: www.bradford.gov.uk/planningpolicy.

Reference copies of each Development Plan Document together with the supporting documents listed will be available for inspection at the deposit locations listed below:

Development Plan Documents

- **Waste Management Development Plan Document Publication Draft**
- **Bradford City Centre Area Action Plan Publication Draft**
- **Shipley and Canal Road Corridor Area Action Plan Publication Draft**

Supporting Documents

Sustainability Appraisal
Habitats Regulations Assessment
Equality Impact Assessment
Statement of Representations Procedure
Statement of Consultation
Engagement Plan
Duty to Co-operate Statement

Deposit Locations

- **CBMDC Principal Planning Office: Jacob's Well, Bradford, BD1 5RW.**
- **CBMDC libraries: Bradford Local Studies Library, Bradford City Library, Bingley, Keighley and Ilkley.**
- **Town Halls & One Stop Shops: Shipley, Keighley and *Ilkley (*By appointment only).**

As part of the consultation a number of sessions have been organised where officers will be available to discuss the individual Development Plans and procedures for making representations. The sessions have been organised as follows;

Waste Management Development Plan Document (Publication Draft)

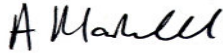
- **6th January 2016 - Keighley Town Hall, Bow Street, Keighley - 3pm to 6pm**
- 8th January 2016 - Shipley Kirkgate Centre, 39a Kirkgate, Shipley - 4pm to 7pm
- 12th January 2016 - Bradford City Library, Centenary Square, 9 Aldermanbury, Bradford - 3pm to 7pm

Bradford City Centre Area and Shipley and Canal Road Corridor Action Plan Development Plan Documents (Publication Draft)

- 7th January 2016 - Shipley Kirkgate Centre, 39a Kirkgate, Shipley - 4pm to 7pm,
- 11th January 2016 - Bradford City Library, Centenary Square, 9 Aldermanbury, Bradford - 3pm to 7pm

Should you have any further queries about the Development Plan Documents consultation process please contact a member of the Development Plans team by E-mail on planning.policy@bradford.gov.uk or telephone (01274) 433679.

Yours faithfully,

A handwritten signature in black ink that reads "A Marshall". The signature is written in a cursive style with a large initial 'A'.

Andrew Marshall
Planning & Transport Strategy Manager

Appendix 2 - List of Media and Press Releases relating to the Consultation

The council issued a press released in December 2015 (below), inviting interested parties to comment on the Waste Management DPD.

“People are invited to have their say over the coming weeks on a series of Local Plan documents being drawn up by Bradford Council.

Public consultation is about to begin on several documents including that Bradford City Centre Area Action Plan (AAP), Shipley & Canal Road Corridor AAP, and Bradford District Waste Management Plan Development Plan Document (DPD) as well as the Bradford District Community Infrastructure Levy (CIL).

The consultation starts on Monday 14 December 2015 and lasts until Monday 8 February 2016 for an eight week period.

This is the formal period for representations before the plans are submitted to the Government for independent examination.

The documents plus background material and comment form will be available online at (www.bradford.gov.uk/planning).

Coun Val Slater, Bradford Council Deputy Leader, said: “We want to make sure as many people as possible are fully informed of our plans for the district’s future.”

Bradford Council will be holding drop in exhibitions early next year on the following dates:

6 Jan - Waste Management DPD - Keighley Town Hall, Ground Floor Room 3pm to 6pm.

7 Jan - AAP's Shipley Kirkgate Centre 4pm to 7pm.

8 Jan - Bradford City Centre AAP and Shipley & Canal Road Corridor AAP – Shipley, Kirkgate Centre 4pm to 7pm.

11 Jan - Bradford City Centre AAP and Shipley & Canal Road Corridor AAP - Bradford City Library - space in library available, 3pm to 7pm.

12 Jan - Waste Management DPD - Bradford City Library - space in library available 3pm to 7pm.”

Chance to discuss plans for the area

BRADFORD Council is running drop-in events across the district as part of a consultation over its Local Plan documents.

The first will be on January 6 for the Waste Management Development Plan Document (DPD) at Keighley Town Hall, Ground Floor Room, 3pm-6pm.

On January 7 the Bradford City Centre Area Action Plan and Shipley & Canal Road Corridor Area Action Plan will be at Shipley Kirkgate Centre, 4pm-7pm, and on January 11 at Bradford City Library, 3pm-7pm.

The Waste Management DPD will be on view on January 8 at Shipley, Kirkgate Centre from 4pm-7pm and on January 12 at Bradford City Library from 3pm-7pm.

Waste Management Development Plan Document (DPD)

The Council is currently preparing the Waste Management Development Plan Document (DPD) which will set out the planning framework for managing the Districts waste in a sustainable manner to 2030.

The Plan includes policies and allocations for the management of all types of waste, including municipal waste in line with the national waste strategy and the relevant European regulations.

The Waste Management DPD Publication Draft version was approved at meeting of Full Council on 20th October 2015.

It is envisaged that the public consultation on the Waste Management DPD will commence in December 2015.

Drop-in events on waste push

SEVERAL drop-in events are being staged across the district by Bradford Council as part of a consultation over its Future Plan documents.

The first session will be in Keighley on January 6.

The event for the Waste Management Development Plan Document (WMDP), is at the town hall ground-floor room from 3pm to 6pm.

Other drop-ins are being held in Shipley and Bradford.

The consultation started on Monday and continues until February 8.

Plans will then be submitted to the Government for independent examination.

Councillor Val Slater, the council's deputy leader, said: "We want to make sure as many people as possible are fully informed of our plans for the district's future."

Documents and comment forms are now available at the website. Visit bradford.gov.uk/planning for more details.

Appendix 3 - Summary of main issues raised through representations

General Comments
<ul style="list-style-type: none"> • General support for the Waste Management DPD • Need to clarify the technical definition of residual waste • Encourage developers to engagement with the Environment Agency early to discuss environmental permitting.
Vision
<ul style="list-style-type: none"> • Additional wording suggested to enhance safeguarding of environmental assets.
Objectives
<ul style="list-style-type: none"> • Broad support for the Objectives
W1: Cross Boundary Working
<ul style="list-style-type: none"> • No Comments Received.
W2: Bradford's Future Waste Capacity Requirements
<ul style="list-style-type: none"> • No Comments Received.
W3: Proposed Waste Site Allocations
<ul style="list-style-type: none"> • No Comments Received.
WM1 - Princeroyd Way, Ingleby Road, Listerhills (2.1 Ha)
<ul style="list-style-type: none"> • Broad support for the proposed allocation. • Environmental permitting considerations put forward
WM2 - Ripley Road, Bowling (2.35 Ha)
<ul style="list-style-type: none"> • Broad support for the proposed allocation.
WM3 - Aire Valley Road, Worth Village, Keighley (2.8 Ha)
<ul style="list-style-type: none"> • A number of representations relating to concerns regarding impacts of the site upon residential amenity, heritage, highway safety, pollution and health;

WM4 - Bowling Back Lane Household Waste Collection and Recycling Site (4.27 Ha)
<ul style="list-style-type: none"> No Comments Received.
WM5 - Merrydale Road, Euroway (2.0 Ha)
<ul style="list-style-type: none"> No Comments Received.
WM6 - Steel Stock and Scrapholders Site, Birkshall Lane (4.1 Ha)
<ul style="list-style-type: none"> No Comments Received.
W4: Sites for Construction, Demolition and Excavation Waste
<ul style="list-style-type: none"> Factual error highlighted;
W5: Sites For Agricultural Waste
<ul style="list-style-type: none"> Factual error highlighted;
W6: Sites for Hazardous Waste
<ul style="list-style-type: none"> Factual error highlighted;
W7: Sites for Residual Waste for final disposal (i.e Landfill)
<ul style="list-style-type: none"> Factual error highlighted;
WDM1: Unallocated Sites
<ul style="list-style-type: none"> No Comments Received.
WDM2: Assessing All Applications for New and Expanded Waste Management Facilities
<ul style="list-style-type: none"> Broad support for Policy WDM2.
WDM3: Applications Resulting in the Loss of a Proposed or Existing Waste Management Facility
<ul style="list-style-type: none"> No Comments Received.

WDM4: Waste Management within Development

- No Comments Received.

WDM5: Landfill Development for Final Disposal of Residual Waste

- Broad support for Policy WDM5

Evidence Base

- No Comments Received.

Sustainability Appraisal

- Concerns regarding the impact of site WM3 upon South Pennine Moors SPA /SAC
- Need to take account of more up to date guidance regarding environmental protection / enhancement.