## **Your City - Your Plan**

Submitted - 06/02/2016

### The Bradford Waste Management Development Plan Document

Client	
Title	Dr
First Name*	
Last Name*	McGowan
Job Title (if applicable)	
Organisation (if applicable)	
House	
Number/Name*	
Street name*	
Locality (e.g. Haworth)	
Town/City*	Keighley
Postcode*	BD21
Email Address*	
Telephone Number	

#### What comment do you wish to make?

A specific site/policy/section in the plan

Details		Is the plan sound?		
document or Map (e.g. WM5)*		Do you consider the the plan	to be sound?*	No
		Which test of soundness are you comments about?		
		Postively Prepared Effective Justified Consistency with National Policy		

#### Please set out why you think the plan is unsound?

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.

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.

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.

# Please set out what change(s) you would consider necessary to make the Plan sound?

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 wast 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 throw Bradford & Keighley.

Is the Plan legally compliant?				
Legally compliant* Don't Know				
Which part of the legal compliance is your comment about?				
Local Development Scheme				
Planning and Compulsory Purchase Act 2004				
Statement of Community Involvement				
Sustainability Appraisal Report				
Consultation of appropriate Statutory Bodies				
Town & Country Planning (Local Planning) Regulations				
Duty to Cooperate				
Not sure/other				
Please give details of why you consider the plan is not clear on legality?				

Taking part in the public examination					
Your comments will be taken into account by the Planning Inspector. Would you like to take part in the					
forthcoming Public Examination?					
No					
Future updates					
Please select from below if you would like to be notified of any of the following?					
The Submission of the Plan(s) for Public Examination					
Furure adoption					