

[REDACTED]

From: [REDACTED] Longcake
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Some comments on the above from WDA perspective.

Overall satisfied with the document and sites (6) allocations, and support the criteria for considering applications for unallocated sites.

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.

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.

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.

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.

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.

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.


[REDACTED]

[REDACTED] Longcake [REDACTED]
Principal Waste Management Officer

[REDACTED]

City of Bradford Metropolitan District Council
Department of Environment & Sport

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