

BRADFORD WASTE MANAGEMENT DPD - EXAMINATION
MATTER 3: NEED FOR NEW WASTE MANAGEMENT FACILITIES Policy W2

Key issue:

Does the Waste Management DPD adequately address the need for new waste management facilities, including existing and future waste arisings for all forms of waste, the existing and future waste capacity gap, and provision to fully meet the need for further waste management capacity, in a manner which is appropriate, effective, deliverable, positively prepared, justified by up-to-date, proportionate and robust evidence, soundly based and consistent with national policy?

Council Response

The Council is of the opinion the Waste Management DPD does adequately address the need for new waste management facilities for existing and future waste arisings for all forms of waste.

A key evidence base document, and the various updates, underpinning the Waste Management DPD is the Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study (WM-SD-047 / WM-SD-048 / WM-SD-049 / WM-SD-050). The 'Assessment is split into two parts, with PART A setting out the context of the report, data sources for forecasting and the cross boundary movements of waste across the region. PART B of the 'Assessment details the existing waste arisings and the future forecasting for the next 15 years, with an analysis of existing waste management capacity and future capacity requirements. The Council considers the evidence base underpinning the Waste Management DPD to be appropriate, effective, deliverable, positively prepared, justified by up-to-date, proportionate and robust evidence, soundly based and consistent with national policy.

3.1 Evidence base

Is the Waste Management DPD accompanied by sufficient, up-to-date, reliable and proportionate evidence about waste arisings and waste management capacity within Bradford district and neighbouring authorities' areas?

Council Response

The Waste Management DPD is accompanied by the Waste Needs Assessment, Capacity Gap Analysis and Site / Facility Requirement Study (WM-SD-047 / WM-SD-048 / WM-SD-049 / WM-SD-050). The 'Study sets out an up-to-date, reliable and proportionate evidence base for existing and future waste arisings within the District, and the existing and future capacity requirements to management the forecast waste arisings. The study has also analysed waste management capacity within neighbouring authorities.

Is the planned provision of new capacity and its spatial distribution based on a robust analysis of the best available data and information, including future waste arisings, and an appraisal of options?

Council Response

Planned provision of new management capacity has been based on robust analysis of the best available data and information. Waste Needs Assessment, Capacity Gap Analysis and Site / Facility Requirement Study sets out the data sources used for each waste stream and how this has been applied in the forecasting of future waste arisings. The report sets out detailed

evidence of how the forecasting data was then applied to projections of waste management capacity required. The 'Study also puts forward a number of options for the provision of sites based on land-take and facility size.

The spatial distribution of the provision of new management capacity has been based on robust analysis of the best data and information. The spatial distribution of sites has been based on the proximity to waste arisings and the proximity to primary road network. This has resulted in spatial distribution of sites centred in and around the City of Bradford and Keighley, the areas in which the majority of Local Authority Collected Waste and Commercial and Industrial Waste arises within the District. In combination with the major of sites within City of Bradford being in close proximity to neighbouring authorities in West Yorkshire, and the proximity to the primary road network, the transportation of waste over large distances should be reduced to a minimum.

Has Bradford MDC worked jointly with other waste planning authorities to collect and share data and information on waste arisings, which takes account of waste arisings across neighbouring waste planning authority areas, any identified national waste management requirements and recycling targets, and the need to identify and provide a suitable network of facilities to deliver sustainable waste management?

The Council Response

Bradford Council has shared information on waste arising's, capacity, facilities etc, through the Y&H WTAB and identified with the Y&H WTAB members the strategic waste facilities across the Y&H area, identifying with the members of the Y&H WTAB where there maybe issues of concern. The Y&H Waste Position Paper assists in pulling these matters together and has concluded that the Y&H area is largely self-sufficient in meeting its waste management needs. Landfill capacity within the WY sub area was identified as a potential issue, but this has been scrutinised, agreed and concluded through the Y&H WTAB and Regional Landfill capacity paper 2016 that; landfill capacity is high across Y&H, but reducing as more new waste management options come online; that there is sufficient landfill capacity for all types of waste across the area, albeit some potential issues may arise for landfill of hazardous waste in South Yorkshire; that if one of the large WY landfills closes early, there is sufficient landfill capacity elsewhere in the Y&H area, albeit the residual waste may have to travel further. A newly identified (Sep 2016), but currently un-quantified issue, is that of Low Level Radioactive Waste Water that may arise through Shale Gas exploration, there are no PDEL licences in Bradford, but Bradford will work with the Y&H WTAB to identify the issues around LLRW water and capacity needs across Y&H. Bradford will continue to monitor and manage through the Y&H WTAB and WYCA/LCR waste management requirements and ensure that a suitable network of waste facilities is maintained across the Y&H area and more particularly the WY sub area. The joint working of the WY authorities is evolving further, as agreement has recently been reached at the WYCA/LCR Heads of Planning on the 8 July 2016, that beyond 2017, joint evidence on waste, in particular waste arising's/capacity gap analysis, is to be undertaken to assist in ensuring that a suitable network of waste management facilities is available across WY sub area and Y&H area.

Through work undertaken on discharging the Duty to Cooperate, the Council has shared information collected on Landfill and Hazardous Waste. The data (consisting of volumes, type, classifications, management type / fate, collected over a 4 year period) was shared with

neighbouring authorities receiving significant volumes of each waste type, and entered in a constructive dialogue with officer from each local authority.

Has Bradford MDC undertaken early and meaningful engagement with local communities and the waste industry, so that the DPD reflects a collective vision and agreed set of priorities when planning for sustainable waste management?

Council Response

The Council has engaged with local communities, the waste industries and key stakeholders throughout every stage of plan production. Meaningful consultation on each, including the Issues and Options, Preferred Approach, Preferred Approach Revised Chapter 5, and the Publication Draft, the Council have sent out notifications by email and post, published press releases through using local media, and held consultation events throughout the District. The details of each consultation, the comments received and the Council's responses can be found with the Statements of Consultation (WM-SD-26. WM-SD-37. WM-SD-45 and WM-SD-60). Through the extensive consultation undertaken on the Waste Management DPD, the Council considers the plan now reflects a collective vision and an agreed set of priorities for sustainable waste management planning within the District.

What are the implications of the updated assessment of Waste Arisings and Capacity Requirements (June 2016), and updated data on Regional Landfill Capacity (July 2016), including changes in forecast arisings and capacity gap assessments for each waste stream, and how will the DPD address these implications?

Council Response

There have been significant changes to the forecast arisings as a result of work undertaken whilst updating the Waste Needs Assessment reflected in the Proposed Modifications document (PS-B004). As part of the update, the 'Assessment now includes additional analysis based on operational capacity of waste management facilities and estimated land-take. The results of the analysis demonstrated the total number of hectares of the sites set out in the Waste Management DPD (17.62ha) is greater than the maximum land take required under the capacity gap forecasts. However, a surplus land take requirement, as put forward in the Waste Management DPD, was advised for the following reasons:

- Providing a choice and mix of potential waste management sites across the District is important to support waste hierarchy objectives;
- It ensures flexibility of the Plan respond to future circumstances and changing approaches to waste management including technological advancement;
- An appropriate mix of sites will help accommodate different waste streams allowing waste operators flexibility to develop the necessary waste management facilities the District needs.

With regards to Regional Landfill Capacity analysis (July 2016)[WD-SD-069], this confirms the position that Bradford was aware of since 2011, that is, there is still sufficient landfill capacity across the Y&H Region for the period of the plan. Bradford has no proposal to allocate landfill sites and this recent landfill analysis justifies the approach set out in the Waste Management DPD. The Regional Landfill Capacity paper notes that the WY area has the potential to lose 10.8millm3 by 2018 if a specific site closes, but as agreed and identified through the Y&H WTAB there is more than sufficient capacity across Y&H Region (94.3 mill m3) within reasonable proximity; there is possible an overcapacity of 14.7 mill m3 of inert material in WY

(due to work undertaken on EA non licenced sites) and hazardous is sufficient in WY at 1.8millm3 due to a reclassification of a site in Kirklees.

3.2 Need for Waste Management Facilities

a. Does Policy W2 and the Waste Management DPD:

- i. identify sufficient opportunities to fully meet the identified needs of Bradford district for the management of all waste streams?**

Council Response

The Council are of the opinion Policy W2 identifies sufficient opportunities to fully meet the identified needs of Bradford District for the management of all waste streams. The policy identifies the need to allocate appropriate sites for LACW and C&I waste arisings, and the onsite management of CDEW and agricultural waste. Where sufficient demand is demonstrated for the management of CDEW and agricultural waste off-site arises, an application for such a development would be assessed under criteria based policies W4 and W5 respectively. The management of hazardous and residual waste for final disposal (i.e. Landfill) waste will continue to be managed at a sub-regional level in the first instance if appropriate and thereafter at a regional level, due to there being sufficient capacity to maintain this existing relationship.

- ii. help to drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities, so that adequate provision is made for the management, treatment and disposal of waste?**

Council Response

The Council are of the opinion Policy W2 encourages waste management to be driven up the waste hierarchy through the provision of appropriate sites for sustainable waste management facilities for LACW and C&I waste streams, and the on-site sustainable management of CDEW, , Agricultural waste, Hazardous and Residual Waste for Final Disposal (i.e. Landfill). This policy approach therefore encourages the sustainable management of waste through the encouraging the increased recycling and recovery through the delivery of facilities or on-site management.

- iii. identify and forecast the amount and percentages of municipal and commercial and industrial waste requiring management and disposal over the plan period, in line with the guidance in the Waste PPG [ID-029/032] and having regard to the Council's Municipal Waste Minimisation & Management Strategy?**

Council Response

Table 4 of Policy W2 sets out the overall volumes of LACW and C&I waste in need of management by 2030. The forecasts are consider compliant and are drawn from the Council's Municipal Waste Minimisation and Management Strategy in regards to the growth rates applied to LACW. Paragraph 3.3 in the supporting text to Policy W2 sets out the growth rate applied to C&I waste, agricultural, CDEW and Hazardous waste, which the Council considers compliant

with the guidance put forward in the Waste PPG. The 'Needs Assessment sets out in greater detail the growth rates considered in the formulation of the waste forecasts.

- iv. **consider the need for any additional waste management capacity of more than local significance and reflect any identified national requirements for waste management facilities?**

Council Response

Policy W2 does not consider the need for any additional waste management capacity of more than local significance, but does reflect on any identified requirement for waste water, which is of a sub-regional significance, within the supporting text of the Policy. Esholt Waste Water Treatment Works (operated by Yorkshire Water) is a major facility located within the Bradford District, but also services a significant portion of properties within the Leeds District. The Council will continue to work with Yorkshire Water and neighbouring authorities on the planning of waste water at both a local and sub-regional / regional level.

- v. **take account of any need for waste management, including for disposal of the residues from treated wastes arising in more than one waste planning authority area where only a limited number of facilities are required?**

Council Response

Policy W2 states hazardous waste and residual waste for final disposal (i.e. landfill) will be managed at a sub-regional, regional and greater than regional level due to their being insufficient levels of arisings to allocated a site for these waste streams; in combination with the fact there is sufficient capacity at a sub-regional, regional and greater than regional level the Council do not consider it appropriate to allocate a site for the management of hazardous or residual waste for final disposal (i.e. landfill). The Waste Management DPD does contain two criteria based policies for sites proposed for the management of hazardous waste (Policy W6) and residual waste for final disposal (i.e. Landfill)(Policy W7) should the demonstrated need for such facilities arise.

- vi. **consider the extent to which the capacity of existing waste management facilities would satisfy any identified need and identify additional waste management facilities to fully meet the identified waste capacity gap and other identified needs?**

Council Response

Policy W2 states the need to allocate appropriate sites for the management of LACW and C&I waste streams in addition to existing capacity. Table 3 in the supporting text to Policy W2 sets out the identified capacity gap for each waste management type, which has taken account of existing waste management facilities. The 'Needs Assessment examines existing waste management capacity within the District and the subsequent capacity gap in greater detail.

- vii. **ensure that the need for waste management facilities is considered alongside other spatial planning concerns, recognising the positive**

contribution that waste management can bring to the development of sustainable communities?

Council Response

Policy WDM4 considers the importance of the contribution of waste management in the development of sustainable communities. The policy will ensure sustainable waste management is integral to all developments within the District.