

**BRADFORD WASTE MANAGEMENT DPD - EXAMINATION**  
**MATTER 6: PROPOSED SITE ALLOCATIONS (Policies W3 & WM1-WM6)**

**Key issue:**

***Are the proposed site allocations in suitable and appropriate locations, are they effective, deliverable, fully justified with evidence and soundly based, and do they properly address site and infrastructure requirements, mitigation measures and environmental, traffic and other considerations, in accordance with national policy?***

**6.1 General**

**a. Does the Waste Management DPD:**

- i. identify sufficient sites suitable for the provision of waste management facilities in appropriate locations, including the broad types of appropriate waste management facilities at the allocated sites, in line with the waste hierarchy and guidance in the Waste PPG [ID-28:037-041]?**

**Council Response**

The Council is of the opinion the Waste Management DPD does identify sufficient sites suitable for the provision of waste management facilities in appropriate locations, including the broad types of appropriate waste management facilities at the allocated sites, in line with the waste hierarchy and guidance in the Waste PPG.

The Waste Management DPD identifies a total of 6 sites across the Bradford District, totalling approximately 17.62ha of land. The sites are considered to be in appropriate strategic locations, as the broad 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 a spatial distribution of sites centre within 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.

All proposed waste management allocation sites have been subject to a rigorous site assessment process undertaken at the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication draft, details of which can be found in documents WD-SD-016, WD-SD-024, WD-SD-034. The criteria have been established in accordance with various policy guidance documents including: The Waste Framework Directive, National Planning Policy for Waste and other good practice guides, including 'Planning for Waste Management Facilities: A Research Paper (2004). The criteria are therefore considered compliant with the National Planning Policy for Waste and Appendix B to the document.

The assessment criteria set in Site Assessment Reports have been subject to consultation at a number of production stages including the Preferred Approach, Preferred Approach: Revised Chapter 5, and the Publication Draft stages. Evidence of this participation in the plan making process can be found in the various Statements of Consultation produced at each stage of consultation. These documents show how key stakeholders have helped shape and change the assessment criteria through each production stage of the Waste Management DPD. The Site Assessment Methodology has also been assessed at each stage including Issues and Options, Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft.

The sites themselves have also been appraised through the Sustainability Appraisal process, details of which can be found with documents WD-SD-002, WD-SD-011 and WD-SD-028, and greater detail within the Sustainability Appraisal Site Assessment Summaries in documents WD-SD-013, WD-SD-022 and WD-SD-030.

The Council acknowledges there are a number of mitigation / enhancement measures for the site suggested in the latest draft of the Sustainability Appraisal (WD-SD-002) which are still outstanding. The Council are looking to address this through the proposed modifications to the plan (PS-B004).

The Council has not stipulated the exact type of facility to be located on the each site, but has identified the broad type of waste management facility that would be appropriately located on each allocated site in line with the waste hierarchy, this permit flexibility and is considered to enable delivery of any future innovation.

- ii. **plan for the disposal and recovery of municipal waste in line with the proximity principle, recognising that new facilities may need to serve a catchment area large enough to secure the economic viability of the plant?**

**Council Response**

The sites are considered to be in appropriate strategic locations, as the broad spatial distribution of the provision of new management capacity has been based on robust analysis of the best data and information available.

The spatial distribution of proposed facilities is considered to satisfy the 'proximity principal as the site identification process was based on the proximity to waste arisings and the proximity to primary road network. This has resulted in spatial distribution of sites centred in the City of Bradford and Keighley. These areas contain the majority of Local Authority Collected Waste arisings within the District, are in close proximity to neighbouring authorities in West Yorkshire, and within close proximity to the primary road network, thus the transportation of waste over large distances should be reduced to a minimum. This will also allow the sites to serve a large enough catchment area, and thus access sufficient supply of waste materials, to ensure the sites are economically viable.

- iii. **consider the opportunities for on-site management of waste where it arises?**

**Council Response**

The Waste Management DPD does encourage on-site management of waste where it arises, specifically Construction, Demolition and Excavation Waste. The management of this waste stream encourages the reuse and recycling of the waste stream, and discourages the transportation of bulky low value waste large distance to facilities and / or other sites, and use reduces the use of primary aggregates.

- iv. **consider the spatial distribution of existing and proposed waste management facilities, related to sustainability and need, encompassing a broad range of locations, with opportunities to co-locate waste management facilities with complementary activities, including low-carbon energy recovery facilities?**

**Council Response**

The Waste Management DPD has considered the spatial distribution of existing and proposed facilities in relation to sustainability and need. The proposed allocated sites, site assessment methodology (including the Area of Search) have been appraised through Sustainability Appraisal process, details of which can be found with documents WD-SD-002, WD-SD-011 and WD-SD-028, and greater detail within the Sustainability Appraisal Site Assessment Summaries in documents WD-SD-013, WD-SD-022 and WD-SD-030.

A key sustainability issue relating to waste is the need to reduce the transportation of materials long distances and the resulting impacts this has upon the environment. Key assessment criteria within the site assessment report considered within the Area of Search was the proximity to the Primary Road Network (A-Road, M-Roads). This ensures facilities would be located in close proximity to the urban areas and any transportation which was required would be on suitable road infrastructure.

The Council are of the opinion the sites put forward within the Waste Management DPD have fully considered the need for sustainability within the plan making process.

Key assessment criteria ('Location') within Sift 2: Detailed Assessment of sites also covers the location of the proposed allocated waste management sites, with emphasis given to sites located in close proximity to current / future waste arisings in Bradford MDC (site is within urban or sub-urban area). This ensures proposed sites are prioritised in areas of the greatest needs for such a facility and reduces the need for the transportation of waste.

The need for proposed allocated waste management sites has also been analysed through Waste Needs Assessment, Capacity Gap Analysis and Site/Facility Requirements Study. The 'Study takes account of spatial of existing facilities within the Bradford District and the sub-region when examining the cross boundary movement of waste arisings.

Key assessment criteria ('Location') within Sift 2: Detailed Assessment of sites also covers the location of the proposed allocated waste management sites, with emphasis given to sites located in close proximity to current / future waste arisings in Bradford MDC (site is within urban or sub-urban area). This ensures proposed sites are prioritised in areas of the greatest needs for such a facility.

The Waste Management DPD puts forward a number of sites across the district in a broad range of locations, but mainly focusing on existing industrial locations, as this is considered to maximise opportunities to co-locate waste management facilities with complementary activities which are often found in these areas, including the potential for combined heat and power networks to which industrial uses are prime candidates for such networks. A number of policies through the Waste Management DPD (Policy W4, W5, W6, W7, WDM1 and WDM5) which encourage the co-location of waste management facilities, which can complement each other, reducing the need for the transportation of waste and encouraging the management of such up the hierarchy.

A number of sites within the City of Bradford have also been examined by the Council's Climate Change Unit for their potential to 'plug' into any future heat network within and around Bradford City Centre; however this work is still at the early stages of production.

- v. **give priority to the re-use of previously-developed land, sites identified for industrial and employment uses, and redundant agricultural/forestry buildings and curtilages?**

#### ***Council Response***

The Site Assessment Report contains a number of assessment criteria used in the analysis of proposed sites for allocated waste management facilities. The Area of Search principles, as set out in the site assessment reports, dictate a sequential approach for the identification of sites at the beginning of the site assessment process. The sequential approach prioritises sites in the following order:

- The expansion and co-location of waste facilities on existing, operational sites; then
- Established and proposed employment and industrial sites where modern facilities can be appropriately developed; then
- Other previously developed land within the Area of Search, including mineral extraction and landfill sites; then
- Greenfield, previously undeveloped sites within the Area of Search; then
- Sites within the Green Belt.

The sequential approach applied within the many of the policies contained within the Waste Management DPD ((Policy W4, W5, W6, W7, WDM1 and WDM5) ) prioritise facilities which the re-use of previously-developed land and sites identified for industrial and employment uses.

Key assessment criteria ('Site Status within the RUDP' 'Land Status') within Sift 2: Detailed Assessment of sites also covers the existing land use allocation and land status of the proposed allocated waste management sites, with priority given to sites located on existing employment allocations and previously development land. This ensures proposed sites are prioritised in areas of the greatest needs for such a facility and reduces the need for the transportation of waste.

The sequential approach applied within the site assessment reports and the Waste Management DPD policies ensure priority is given to the re-use of previously development land and sites identified in industrial and employment uses.

- b. **Has the Waste Management DPD objectively assessed the suitability of sites for new/enhanced waste management facilities accurately and comprehensively against the following criteria:**
- i. **the extent to which the site would support national planning policies for waste, including the locational criteria set out in Appendix B to the National Planning Policy for Waste (NPPW)?**

#### ***Council Response***

The Council are of the opinion the Waste Management DPD and the supporting site assessment reports have objectively assessed the suitability for new/enhanced waste management facilities accurately and comprehensively against the extent to which the sites will support national planning policies for waste, including the locational criteria set out in Appendix B to the National Planning Policy for Waste (NPPW).

Where issues have been identified on proposed allocated waste management sites, mitigation measures have been proposed within the proposed site allocation statement to ensure site specific impacts are minimised.

The site assessment report has assessed the proposed allocated sites in detail using a variety of assessment criteria. Policy 'WDM 2: Assessing All Applications for New and Expanded Waste Management Facilities' of the Waste Management DPD also assesses the suitability of all proposed new/enhanced waste management facilities using a range of assessment criteria.

The assessment criteria used within both the site assessment reports and Policy WDM2 is considered to support national planning policies for waste and location criteria set out in Appendix B of the NPPW.

**ii. physical and environmental constraints to development, including sensitive/ neighbouring land uses, flood risk, visual and amenity impact and deliverability?**

***Council Response***

The site assessment report has assessed the proposed allocated sites in detail using a variety of assessment criteria ('Site Proximity to Sensitive Uses', 'Physical Development Constraints' 'Visual / Landscape Impact', 'Development Cost/Value for Money', including those relating to physical and environmental constraints including sensitive/ neighbouring land uses, flood risk, visual and amenity impact and deliverability. Policy 'WDM 2: Assessing All Applications for New and Expanded Waste Management Facilities' of the Waste Management DPD also assesses the suitability of all proposed new/enhanced waste management facilities using a range of assessment criteria.

The assessment criteria used within both the site assessment reports and Policy WDM2 is considered to support national planning policies for waste and locational criteria set out in Appendix B of the NPPW.

**iii. the capacity of existing and potential transport infrastructure to support the sustainable movement of waste and products arising from resource recovery?**

***Council Response***

The site assessment report has assessed the proposed allocated sites in detail using a variety of assessment criteria, including those relating to the capacity of existing and potential transport infrastructure to support the sustainable movement of waste and products arising from resource recovery ('Site Accessibility to Transport Networks'). Policy 'WDM 2: Assessing All Applications for New and Expanded Waste Management Facilities' of the Waste Management DPD also assesses the suitability of all proposed new/enhanced waste management facilities using a range of assessment criteria.

The assessment criteria used within both the site assessment reports and Policy WDM2 is considered to support national planning policies for waste and locational criteria set out in Appendix B of the NPPW.

**iv. the cumulative impact of existing and proposed waste management and disposal facilities on the well-being of local communities, including any significant impacts on environmental quality, social cohesion, amenity and economic potential?**

***Council Response***

The Sustainability Appraisal has been the primary mechanism for assessing sites in regard to impacts upon environmental quality, social cohesion, amenity and economic potential. The proposed allocated site and policies of the Waste Management DPD have been appraised throughout the plan making process, with the proposed mitigation / enhancement measures suggested as part of the proposal being incorporated into the site allocation statement and relevant policies.

The Council acknowledges there are a number of mitigation / enhancement measures for the site suggested in the latest draft of the Sustainability Appraisal (WD-SD-002) which are still outstanding. The Council are looking to address this through the proposed modifications to the plan (PS-B004).

The site assessment report has assessed the proposed allocated sites in detail using a variety of assessment criteria, including those relating to the cumulative impact of existing and proposed waste management and disposal facilities on the well-being of local communities, including any significant impacts on environmental quality, social cohesion, amenity and economic potential. Policy 'WDM 2: Assessing All Applications for New and Expanded Waste Management Facilities' of the Waste Management DPD also assess the suitability of all proposed new/enhanced waste management facilities using a range of assessment criteria.

- c. **Should the Waste Management DPD encourage developers to enter into early discussions with the Environment Agency about Environmental Permitting considerations relating to specific site allocations?**

***Council Response***

The Council is of the opinion developers should be encouraged to enter into early discussions with the Environment Agency about Environmental Permitting considerations relating to specific site allocations. Paragraphs 6.6 – 6.12 in Section 6 (Paragraphs 6.6 – 6.12) of the Waste Management DPD, encourages the early engagement with the Council through the pre-application process. However, the Council is aware the text in this section does not explicitly encourage the early engagement with the Environment Agency to discuss the Environmental Permitting consideration relating to site allocations. The Council is prepared to make a modification to the supporting text to reflect this.

**6.2 Site Allocations**

**a. Site WM1**

- i. **Is this site suitable for the types of waste management facilities identified?**

***Council Response***

The Council are of the opinion the site is suitable for the types of waste management facilities identified within the site allocation proposal statement.

A comprehensive site assessment has been undertaken on Site WM1, the results of which have not identified any barriers to developing the facility types identified.

- ii. **Have all relevant infrastructure requirements and mitigation measures been addressed, including transport/access, utilities, flood risk, drainage and impact on residential amenity?**

***Council Response***

The Council are of the opinion all the relevant infrastructure requirements and mitigation measures have been properly addressed within site allocation statements of the proposed sites, including transport/access, utilities, flood risk and drainage. Mitigation measures proposed have been subject to consultation with key stakeholders including (but not exclusively) Highways England, transport providers and undertakers, utilities providers and the Environment Agency, throughout the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft. In addition to this, internal consultation with officers of Bradford Council has taken place on infrastructure requirements and mitigation measures have taken place. As a result of the consultation, key stakeholder have inputted into the relevant sections of the proposed allocation statements to ensure transport / access, utilities, flood risk and drainage have all been properly addressed.

**iii. What is the latest planning status of the site and its likely waste management capacity, and is the proposal deliverable within the expected timescale?**

**Council Response**

The proposed allocated site currently has no live planning application or extent planning permission for waste management.

The likely capacity of the site is estimated at 100,000 to 150,000 tonnes, dependant on what facility is proposed / delivered.

The site assessment has not identified any significant issues which would prevent the delivery of the site within the timescales set out in the Waste Management DPD. The capacity gap analysis undertaken through the 'Needs Assessment also sets out a significant shortfall in the facilities required to meet the projected need. The combination of high levels of need and lack of delivery issues, the Council is of the opinion the site is deliverable within the expected timescales.

**b. Site WM2**

**i. Is this site suitable for the types of waste management facilities identified?**

**Council Response**

The Council are of the opinion the site is suitable for the types of waste management facilities identified within the site allocation proposal statement.

A comprehensive site assessment has been undertaken on Site WM2, the results of which have not identified any barriers to developing the facility types identified.

**ii. Have all relevant infrastructure requirements and mitigation measures been addressed, including transport/access, utilities, flood risk, drainage and impact on the landscape and historic assets?**

**Council Response**

The Council are of the opinion all the relevant infrastructure requirements and mitigation measures have been properly addressed within site allocation statements of the proposed sites, including transport/access, utilities, flood risk and drainage. Mitigation measures proposed have been subject to consultation with key stakeholders including (but not exclusively) Highways England, transport providers and undertakers, utilities providers and the Environment Agency, throughout the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft. In addition to this, internal consultation with officers of Bradford Council has taken place on infrastructure requirements and mitigation measures have taken place. As a result of the consultation, key stakeholder have inputted into the relevant sections of the proposed allocation statements to ensure transport / access, utilities, flood risk and drainage have all been properly addressed.

It should also be noted that site development issues have also been addressed through planning application 09/05140/FUL (renewed in in 2013 and 2016) for the proposed gasification waste management facility.

**iii. What is the latest planning status of the site and its likely waste management capacity, and is the proposal deliverable within the expected timescale?**

**Council Response**

The likely capacity of the site is estimated at 120,000 to 160,000 tonnes, dependant on what facility is proposed / delivered. There is currently a live planning application on the site, renewed under application 16/01827/VOC, for a proposed gasification waste management facility. The site assessment has not identified any significant issues which would prevent the delivery of the site within the timescales set out in the Waste Management DPD. The capacity gap analysis undertaken through the 'Needs Assessment also sets out a significant shortfall in the facilities required to meet the projected need. The combination of high levels of need and lack of delivery issues, the Council is of the opinion the site is deliverable within the expected timescales.

**c. Site WM3**

**i. Is this site suitable for the types of waste management facilities identified, including gasification and pyrolysis?**

**Council Response**

The Council are of the opinion the site is suitable for the types of waste management facilities identified, including gasification and pyrolysis, within the site allocation proposal statement.

A comprehensive site assessment has been undertaken on Site WM3, the results of which have not identified any barriers to developing the facility types identified.

It is worth noting a planning application was granted for a pyrolysis and energy from waste facility on the site in 2013 (13/04217/FUL).

**ii. Have all relevant infrastructure requirements and mitigation measures been addressed, including transport/HGV movements, access, utilities, pollution, flood risk, drainage, and impact on residential amenity and health, highway safety, heritage assets and on the South Pennine Moors SAC/SPA?**

**Council Response**

The Council are of the opinion all the relevant infrastructure requirements and mitigation measures have been properly addressed within site allocation statements of the proposed sites, including transport/access, utilities, flood risk and drainage and impact on residential amenity and health, highway safety, heritage assets and on the South Pennine Moors SAC/SPA. Mitigation measures proposed have been subject to consultation with key stakeholders including (but not exclusively) Highways England, transport providers and undertakers, utilities providers, Natural England, Historic England and the Environment Agency, throughout the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft. In addition to this, internal consultation with officers of Bradford Council has taken place on infrastructure requirements and mitigation measures have taken place. As a result of the consultation, key stakeholder have inputted into the relevant sections of the proposed allocation statements to ensure transport / access, utilities, flood risk and drainage have all been properly addressed.

The sites have also been appraised through the Sustainability Appraisal process in regards to residential amenity, health, heritage, safety and the natural environment. Details of the appraisal can be found with documents WD-SD-002, WD-SD-011 and WD-SD-028, and greater detail within the Sustainability Appraisal Site Assessment Summaries in documents WD-SD-013, WD-SD-022 and WD-SD-030.

In regards to specific impact of the site upon the South Pennine Moors SAC / SPA, this has been assessed through the Habitats Regulation Assessment WD-SD-052, which has been produced in consultation with Natural England and the Environment Agency. The Council acknowledges there are a number of mitigation / enhancement measures for the site specifically relating to the impact upon the SPA / SAC suggested in the latest draft of the Sustainability Appraisal (WD-SD-002) which are still outstanding. The Council are looking to address this through the proposed modifications to the plan (PS-B004).

It should also be noted that site development issues (including the addressing any impacts upon the South Pennines SPA/SAC) have also been addressed through planning application 13/04217/FUL and 16/06857/FUL (with linked application 16/06850/MAO & 16/06851/MAO) for the proposed gasification waste management facility.

**iii. What is the latest planning status of the site and its likely waste management capacity, and is the proposal deliverable within the expected timescale?**

**Council Response**

Planning permission was granted in April 2014 (13/04217/FUL) for three energy from waste plants on this site, including an EfW (taking C&I waste 100ktpa), tyre pyrolysis (10ktpa) plant and waste plastic plant (30ktpa) – generation of 13MW of electricity and CHP ready. A further application (15/01381/FUL) for two plants, which proposed a higher building and larger mass of buildings for an EfW (taking C&I waste 100ktpa) and waste plastics plant (30ktpa) was refused in August 2015 on visual amenity, height massing and finish of the buildings. A further application (16/06857/FUL) was received by the Council in Aug 2016, which has the same waste facilities proposed as the 2015 application, but with alternate buildings and an alternate finish. The 2016 application is also linked to two other applications (16/06850/MAO & 16/06851/MAO) for a data centre and battery farm, which would

utilise the electricity generated from the EfW. The Developer has indicated that they would be able to start on site within 6 months.

The site assessment has not identified any significant issues which would prevent the delivery of the site within the timescales set out in the Waste Management DPD. The capacity gap analysis undertaken through the 'Needs Assessment also sets out a significant shortfall in the facilities required to meet the projected need. The combination of high levels of need and lack of delivery issues, the Council is of the opinion the site is deliverable within the expected timescales.

**d. Site WM4**

**i. Is this site suitable for the types of waste management facilities identified?**

***Council Response***

The Council are of the opinion the site is suitable for the types of waste management facilities identified within the site allocation proposal statement. A comprehensive site assessment has been undertaken on Site WM4, the results of which have not identified any barriers to developing the facility types identified.

**ii. Have all relevant infrastructure requirements and mitigation measures been properly addressed, including transport/access, utilities, flood risk and drainage?**

***Council Response***

The Council are of the opinion all the relevant infrastructure requirements and mitigation measures have been properly addressed within site allocation statements of the proposed sites, including transport/access, utilities, flood risk and drainage. Mitigation measures proposed have been subject to consultation with key stakeholders including (but not exclusively) Highways England, transport providers and undertakers, utilities providers and the Environment Agency, throughout the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft. In addition to this, internal consultation with officers of Bradford Council has taken place on infrastructure requirements and mitigation measures have taken place. As a result of the consultation, key stakeholder have inputted into the relevant sections of the proposed allocation statements to ensure transport / access, utilities, flood risk and drainage have all been properly addressed.

It should also be noted that site development issues have also been addressed through planning application [12/01947/FUL](#) for the proposed waste management facility.

**iii. What is the latest planning status of the site and its likely waste management capacity, and is the proposal deliverable within the expected timescale?**

***Council Response***

Planning permission (12/01947/FUL) was granted in November 2012 for a Mechanical Recycling Plant (MRP) and an Energy Recovery Plant (ERP) to optimise the proportion of recyclables extracted from residual waste. The MRP would have been a waste sorting and separation plant. The ERP plant would have processed around 190,000 tonnes of residual municipal waste per annum and will produce 14.8MW of electricity. The Council in Partnership with Calderdale Council initiated a procurement exercise through the PFI process in 2005, in order to address how the Council was managing its waste. Primary drivers were to increase recycling and divert waste from landfill. This process involved competitive dialogue and a bidding process, which concluded in December 2011 when a successful bidder was announced. The application was from the successful bidder and was granted approval in Nov 2016. PFI credits were withdrawn from Bradford Council before the planning permission was implemented and the site remains in use as a waste transfer and bulking station for LACW.

The site assessment has not identified any significant issues which would prevent the delivery of the site within the timescales set out in the Waste Management DPD. The capacity gap analysis undertaken through the 'Needs Assessment also sets out a significant shortfall in the facilities required to meet the projected need. The combination of high levels of need and lack of delivery issues, the Council is of the opinion the site is deliverable within the expected timescales.

e. **Site WM5**

i. **Is this site suitable for the types of waste management facilities identified?**

**Council Response**

The Council are of the opinion the site is suitable for the types of waste management facilities identified within the site allocation proposal statement.

A comprehensive site assessment has been undertaken on Site WM5, the results of which have not identified any barriers to developing the facility types identified.

ii. **Have all relevant infrastructure requirements and mitigation measures been addressed, including transport/access, utilities, flood risk and drainage, and impact on the South Pennine Moors SAC/SPA?**

**Council Response**

The Council are of the opinion all the relevant infrastructure requirements and mitigation measures have been properly addressed within site allocation statements of the proposed sites, including transport/access, utilities, flood risk and drainage. Mitigation measures proposed have been subject to consultation with key stakeholders including (but not exclusively) Highways England, transport providers and undertakers, utilities providers and the Environment Agency, throughout the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft. In addition to this, internal consultation with officers of Bradford Council has taken place on infrastructure requirements and mitigation measures have taken place. As a result of the consultation, key stakeholder have inputted into the relevant sections of the proposed allocation statements to ensure transport / access, utilities, flood risk and drainage have all been properly addressed.

The Council is of the opinion any proposed waste management facility on Site WM5 will not impact upon the South Pennine Moors SAC / SPA. Habitats Regulations Screening Assessment (WD-SD-051) undertaken as part of the supporting evidence did not identify the site as having any potential significant impact upon the SAC / SPA. It is also worth noting the site is not within 10km of the South Pennine Moors SAC / SPA.

iii. **What is the latest planning status of the site and its likely waste management capacity, and is the proposal deliverable within the expected timescale?**

**Council Response**

The proposed allocated site currently has no live planning application or extent planning permission for waste management.

The likely capacity of the site is estimated at 100,000 to 150,000 tonnes, dependant on what facility is proposed / delivered.

The site assessment has not identified any significant issues which would prevent the delivery of the site within the timescales set out in the Waste Management DPD. The capacity gap analysis undertaken through the 'Needs Assessment also sets out a significant shortfall in the facilities required to meet the projected need. The combination of high levels of need and lack of delivery issues, the Council is of the opinion the site is deliverable within the expected timescales.

f. **Site WM6**

i. **Is this site suitable for the types of waste management facilities identified?**

**Council Response**

The Council are of the opinion the site is suitable for the types of waste management facilities identified within the site allocation proposal statement.

A comprehensive site assessment has been undertaken on Site WM6, the results of which have not identified any barriers to developing the facility types identified.

- ii. **Have all relevant infrastructure requirements and mitigation measures been addressed, including transport/access, utilities, flood risk and drainage and impact on the amenities of nearby residential properties?**

***Council Response***

The Council are of the opinion all the relevant infrastructure requirements and mitigation measures have been properly addressed within site allocation statements of the proposed sites, including transport/access, utilities, flood risk, drainage and residential amenity. Mitigation measures proposed have been subject to consultation with key stakeholders including (but not exclusively) Highways England, transport providers and undertakers, utilities providers and the Environment Agency, throughout the Preferred Approach, Preferred Approach Revised Chapter 5 and Publication Draft. In addition to this, internal consultation with officers of Bradford Council has taken place on infrastructure requirements and mitigation measures have taken place. As a result of the consultation, key stakeholder have inputted into the relevant sections of the proposed allocation statements to ensure transport / access, utilities, flood risk and drainage have all been properly addressed.

The sites have also been appraised through the Sustainability Appraisal process in regards to residential amenity. Details of the appraisal can be found with documents WD-SD-002, WD-SD-011 and WD-SD-028, and greater detail within the Sustainability Appraisal Site Assessment Summaries in documents WD-SD-013, WD-SD-022 and WD-SD-030.

- iii. **What is the latest planning status of the site and its likely waste management capacity, and is the proposal deliverable within the expected timescale?**

***Council Response***

The proposed allocated site currently has no live planning application or extent planning permission for waste management.

The likely capacity of the site is estimated at 100,000 to 150,000 tonnes, dependant on what facility is proposed / delivered.

The site assessment has not identified any significant issues which would prevent the delivery of the site within the timescales set out in the Waste Management DPD. The capacity gap analysis undertaken through the 'Needs Assessment also sets out a significant shortfall in the facilities required to meet the projected need. The combination of high levels of need and lack of delivery issues, the Council is of the opinion the site is deliverable within the expected timescales.