## **Waste Management DPD Schedule of Main Modifications**

The document sets out the Main Modifications required to the Submission Draft of the Waste Management DPD [WM-SD-001] to ensure that it is sound and legally compliant.

In terms of presentation, the deletion of text is denoted with a 'strike through' (strike through), with inserted new text as bold underlined (new text). Where the detailed wording of the policies and/or accompanying text has been amended following consultation on the Proposed Main Modifications, these are highlighted in red.

Page and paragraph numbers relate to the Waste Management DPD as submitted: Submission Document [WM-SD-001]

## Main Modifications (MM)

Modification	Page	Policy /	Proposed Modification
Number	No.	Paragraph	
MM1	5	Vision	Bradford needs to take responsibility for the waste it generates, undertaking a step-change in the way it manages its waste, through more sustainable waste management, moving the management of waste up the waste hierarchy of: prevention; preparing for re-use; recycling; other recovery and only disposing of waste as a last resort. We aspire to achieve net self-sufficiency, managing the waste we generate at the nearest appropriate facilities, and will put in place the necessary structures and systems to enable this to happen including the promotion of a range of technologies, modal shift in the transportation of waste arisings and cross=boundary working where appropriate. This will aid in climate mitigation and adaptation
MM2	6	Objective 3	"To ensure that expansions to existing facilities where appropriate and new waste facility developments support the planned growth and waste needs of the Bradford community and are delivered in a manner which protects <a href="mailto:and,where">and, where</a> <a href="mailto:appropriate">appropriate</a> , <a href="mailto:enhances">enhances</a> the District's environmental assets and safeguards human health"
MM3	6	Objective 5	Objective 5: To work in collaboration with appropriate local authorities and waste industry operators to ensure that subregional waste (and if necessary beyond the subregion) issues are effectively considered and planned for in accordance with the duty to co-operate. Cross boundary issues including the movement of waste, transportation of waste arisings by sustainable transport modes and locating of facilities near to source must be managed and planned for collectively where possible

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Number	No.	Paragraph	
MM4	10	2.19	The Waste Management DPD therefore does consider opportunities for joint cross-boundary working on waste matters and also reflects the possibility of a continued Bradford and Calderdale joint initiative for Municipal Solid Waste management
			facilities. need to work closely with neighbouring authorities.
MM5	11	Policy W1	Work collaboratively to promote (where possible) modal shift in the movement of waste from road to more sustainable
			forms of transport.
MM6	12	Table 1	Table 1: Summary Current Total Waste Arisings in Bradford ( <del>2012</del> <b>2013</b> )
			Type of Waste Arising Arisings (Tonnes)
			Agricultural Waste <del>283,132</del> <b>296,902</b> <del>20.204</del> <b>20.6%</b>
			Commercial Waste <u>254,314</u> <u>18.20</u> <u>17.6%</u>
			Industrial Waste <u>219,773</u> <u>15.71</u> <u>14.2%</u>
			Construction Demolition and Excavation Waste 350,000 440,000 25.02% 30.6%
			Hazardous Waste <del>19,155</del> <b>19,084</b> <del>1.37%</del> <b>1.3%</b>
			Local Authority <del>272, 668</del> <b>226,085 19.50 15.7%</b>
			Total*** 1,399,042 100 1,456,158
			Waste Water** 1,024,568 Type of Waste Arising Arisings (Tonnes)
			Source: Environment Agency Waste Data Interrogator (WDI) 2012 2013*. Yorkshire Water 2014**. Total Being Planned for
			in the Waste Management DPD through either planning policy or site allocations or a combination of both***

Modification Number	Page No.	Policy / Paragraph	Proposed Mod	dification					
MM7	13	Table 2	Table 2: Forecast Waste Arisings in Bradford (20 <del>13</del> 15-30) using Bradford Waste Forecasting Model Waste Stream						
			Waste Stream	2013	2015	2020	2025	2030	
			Agricultural Waste*	283,133	283,133 296,902	283,133 296,902	283,133 296,902	283,133 296,902	
			Commercial and Industrial	<del>513,830</del>	538,326 498,621	558,882 522,078	580,329 546,797	602,721 572,863	
			Waste* CDEW*	447,604	455,709 443,504	472,360 456,971	483,800 470,844	495,515 485,141	
			Hazardous Waste*	<del>19,153</del>	<del>19,764</del> <b>19,338</b>	<del>20,267</del> <b>20,386</b>	<del>20,782</del> <b>22,066</b>	21,311 23,570	
			Local Authority Collected Waste – Bradford**	<del>226,085</del>	227,880 200,419 <sup>1</sup>	257,738 226,684 <sup>2</sup>	268,780 236,396 <sup>3</sup>	279,282 245,629 <sup>4</sup>	
			Total Tonnes	1,489,805	1,524,812	1,592,380	1,636,824	1,681,962	

Modification Number	Page No.	Policy / Paragraph	Proposed Modification	
			1,458,784	1,523,021 1,550,939 1,624,105
			<sup>1</sup> 145,648 tonnes of Secondary Waste ge	nerated for Residual Mechanical Treatment
			•	nerated for Residual Mechanical Treatment
				nerated for Residual Mechanical Treatment
			<sup>4</sup> 178,504 tonnes of Secondary Waste ger	nerated for Residual Mechanical Treatment
MM8	8 15 Table 3		Waste Management	Existing Capacity Gap (Tonnes)
			Landfill (non-hazardous) 59	<del>9,439</del> <u>61,655</u>
			Landfill (hazardous) 74	4– <u>5,035</u>
			Landfill (CD&E)	<del>01,200</del> <b>74,945</b>
			Energy recovery (LACW & C&I)	<del>)3,169</del> <u><b>102,346</b></u>
			Incineration (Specialist High Temp)	<del>33</del> <u>861</u>
			Recycling (C&I and LACW) 46	<del>00,084</del> <b>444,225</b>
			Recycling (aggregates CD&E) 1:	<del>12,975</del> <b>334,834</b>
			Recycling (specialist materials— 4	<del>,,059</del> - <b>2,306</b>
			including metal recycling, End of	
			Life Vehicles and WEEE	
			Composting 34	<del>1,340</del> <u><b>4,421</b></u>
			Residual Mechanical Treatment 4	<del>99,146-<b>195,277</b></del>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification						
			Treatment Plant (inc Anaerobic Digestion, treatment of biodegrand wastes, organic treatment by distillat	specialised radable liquids waste	<del>-52,376</del> - <u><b>46,643</b></u>				
MM9	16	Policy W2	providing for this leve (including energy from sufficiency and acknow	I of waste, the C n waste) in acco wledges the mo	council will support the prevention rdance with the Core Strategy pol	es of waste arisings over the period to 2030. In n of waste, its re-use, recycling and other recovery licy WM1. The Council aim is to achieve net self-lution to waste management may result in relying on and national policy guidance.			
MM10	16	Policy W2 Table 4	Waste Stream Agricultural Waste	Capacity Requ	283,133 296,902				
			Commercial and Industrial Waste		<del>602,721</del> <u><b>572,863</b></u>				
			CDEW		495,515 485,141				
			Hazardous Waste		21,311 23,570				

Modification Number	Page No.	Policy / Paragraph	Proposed Modification			
			Local Authority		<del>279,282</del>	
			Collected Waste – Bradford		<u>245,629*</u>	
			Total Tonnes		1,681,962	
					<u>1,624,105*</u>	
			*178,504 tonnes of Secondary Loca	al Authority Collected Waste g	enerated for Residual Mechanica	al Treatment
MM11	17	4.1 and 4.2	The established capacity gap is now needed to be translated into a land requirement for new waste manager be allocated within the DPD. This can be extrapolated by working on a broad estimate-of approximately 50,0 tonnes per hectare of most standard treatment technologies. This equates to a minimum need of approximately of developable land for allocated waste management sites of various sizes and distributed across the District following:  Table 5 – Site Size Assumptions			
			Facility Type	Tonnage	Land Take	
			Materials Recycling/Reprocessing Facilities (LACW & C&I waste)	128,000 tonnes	1 ha	
			Materials Recycling/Reprocessing Facilities (C&D waste)	63,000 tonnes	1 ha	

Modification	Page	Policy /	Proposed Modification					
Number	No.	Paragraph						
			Non-hazardous non-	100,000 to 500,000	N/A			
			inert landfill	tonnes (or the				
				equivalent void space)				
			Non-hazardous inert landfill	100,000 tonnes	N/A			
			Hazardous landfill	20,000 tonnes	N/A			
			Composting	25,000 to 35,000 tonnes.	1 – 2 ha			
			Energy Recovery	100,000 – 200,000 tonnes	2 – 3 ha			
			Residual Mechanical	100,000 tonnes	1 ha			
			Treatment					
			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. A surplus land take requirement has been adopted for the following					
			<ul> <li>Providing a choice and hierarchy objectives;</li> </ul>	I mix of potential waste m	anagement sites acro	ss the District is important to support waste		
				the Plan respond to futur	e circumstances and o	changing approaches to waste management		
			including technological					
			• An appropriate mix of	sites will help accommod	ate different waste st	reams allowing waste operators flexibility to		

Modification	Page	Policy /	<b>Proposed Modification</b>					
Number	No.	Paragraph						
			develop the necessary was	ste manager	nent facilities the Distr	ict needs.		
			More information relating accompanying Evidence Ba			·		
			4.2-Providing a choice and hierarchy objectives. An agwaste) allowing waste ope	p <del>ropriate m</del>	ix of sites will help acco	mmodate different w	aste streams (particu	ularly MSW and C&I
MM12		Additional Table	Waste Management	Year	Tonnage/year	Min no new (additional) Facilities in year	Size (ha)	
			Energy recovery (LACW & C&I)	2015	100,404	1	2 – 3 ha	
			ا م دها	2020	94,412	0	2 – 3 ha <b>N/A</b>	
				2030	102,346	0	2 – 3 ha <b>N/A</b>	-
			Incineration (Specialist	2015	861	<1	N/A	-
			High Temp)	2020	861	<1	N/A	-
				2030	861	<1	N/A	-
			Recycling (C&I and LACW)	2015	325,611	3	3 ha	
				2020	385,958	0	3 ha <b>N/A</b>	]

Modification Number	Page No.	Policy / Paragraph	Proposed Modification				
				2030	444,225	1	4ha 1 Ha
			Recycling (aggregates CD&E)	2015	148,313	3	N/A Extant PP in place in combination with onsite management
				2020	315,301	2	N/A Extant PP in place in combination with onsite management
				2030	334,834	0	N/A Extant PP in place in combination with onsite management
			Composting	2015	-16,692	Surplus	Surplus
				2020	-649	Surplus	Surplus
				2030	4,421	<1	N/A
			Residual Mechanical Treatment	2015	16,073	1	<del>0.5</del> - <u>1 ha</u>
				2020	180,844	1	<del>2 ha</del> <b>1 ha</b>

Modification Number	Page No.	Policy / Paragraph	Proposed Modification					
				2030	195,277	0	4 ha <b>N/A</b>	
			Total estimated addition	onal land take			9 ha	
MM13	17	4.5	A number of sites have been shortlisted as having potential to accommodate more than one type of waste management facility, subject to Environmental Permits being obtained. Applicants are advised to enter into discussions with the Environment Agency regarding Environmental Permits at the earliest opportunity to assist in identifying and responding to any key issues, which may need to be addressed. Any development proposals on shortlisted sites must accord with the relevant Waste Development Management policies as set out in Section 7 of this document. For further information on the site assessment process see the full Site Assessment Report which accompanies this document.					fying and responding must accord with the
MM14	21	Site WM1	In addition, there is a new development on Site 1, the landscaping should not be of UK genetic provenance site development takes habitat fragmentation, here	o form a wildli be incorporated e and be appro place the follo	fe buffer zone, which d into the buffer zone opriately retained and wing effects will nee	should be free free. The buffer zone managed throughto be investigated.	rom all built developmen should be planted with ghout the lifetime of the ted and mitigated: the p	t and any formal locally native species development. <u>Before</u>
MM15	21	Site WM1	Utilities  Access to national grid /  Due to the site's proxim proposed facility may provider heat network in the	ity neighbouri	ng commercial prope ty to the national gri	erty, the applican d via a local conr	nection and the potentia	I for contributing to a
MM16	21	Site WM1	Visual and landscape assimprovements to the sit				ty and prominence withi	n the area. Visual

Modification	Page	Policy /	Proposed Modification
Number	No.	Paragraph	
MM17	23	Site WM2	Before site development takes place the following effects will need to be investigated and mitigated: the potential on the
			site for habitat fragmentation and habitat enhancement (including helping to achieve BAP targets). Air quality and noise
			should be assessed (in accordance with Policy WDM2) and mitigation put in place as necessary.
MM18	23	Site WM2	Utilities
			Access to national grid / capacity of grid for local energy production? District heat network potential due to proximity to the
			city centre? Stand off distance from the railway line?
			Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the
			proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a
			wider heat network in the local area within the supporting information of any planning application.
MM19	23	Site WM2	Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual
			improvements to the site should be sought through its redevelopment;
MM20	25	Site WM3	Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual
			improvements to the site should be sought through its redevelopment;
			The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or
			SAC will need to be assessed under the Habitats Regulations through a project level Appropriate Assessment (AA) if it is
			determined by an appropriate body that such an assessment is required."
MM21	25	Site WM3	Utilities
			Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the
			proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a
			wider heat network in the local area within the supporting information of any planning application.

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
MM22	27	Site WM4	Before site development takes place the following effects in particular will need to be investigated and mitigated: effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built environment and the potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets). Air quality, noise and visual effects should be assessed and mitigation put in place as necessary due to residential receptors located nearby.
MM23	27	Site WM4	Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.
MM24	27	Site WM4	Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;
MM25	<del>29</del>	Site WM5	Air quality and noise assessment and appropriate mitigation will be required in order to ensure there are no negative effects on sensitive receptors.
MM26	29	Site WM5	Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.
MM27	29	Site WM5	Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;
MM28	31	Site WM6	Before site development takes place the following effects in particular will need to be investigated and mitigated: effects on the two Listed Buildings west of the site, the effect on the quality of the surrounding built environment and the

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			potential on the site for habitat fragmentation, habitat enhancement (including helping to achieve BAP targets).
MM29	31	Site WM6	Utilities
			Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.
MM30	31	Site WM6	Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;
MM31	33	5.3	The key issues for Bradford District in relation to the management of Construction, Demolition and Excavation Waste (CDEW) are:  • CDEW arisings form a significant proportion of total waste arisings across Bradford District at the current time and forecast
			<ul> <li>• CDEW arisings are likely to grow in the future linked to the District's forecast population growth and the subsequent need for local planning of economic and housing development. This growth will stimulate additional waste arisings; The Council will encourage the management of CDEW waste (along with other waste streams) on-site at the point of origin with an emphasis on re-use and recycling, in accordance with the waste hierarchy. The Council considers this the most sustainable and environmentally sound solutions for management of Construction, Demolitions and Excavation Waste. The Council are of the opinion the capacity gap for Construction and Demolition Waste can be addressed through a combination of an extant planning permission for CDEW management and the continuation of on-site management.</li> </ul>
MM32	35	5.4	Although the quantities of agricultural waste are quite significant, reaching 283,133 296,902 tonnes by 2030, the quantities of agricultural waste for off-site management are very small at just over 2,000 tonnes and this is fragmented across facilities

Modification Number	Page	Policy /	Proposed Modification
Number	No.	Paragraph	
			of various types
MM33	40	6.6	Pre-application consultation with the Council is essential to establish what supporting information is likely to be required and is strongly encouraged as an important element of applying for permission for waste development. This is particularly so given the likely need for a supporting Environmental Impact Assessment (EIA), Transport Assessment, Health Impact Assessment and other impact related studies. Such liaison will also help ensure planning applications are processed efficiently and effectively. In accordance with the Localism Act and the NPPF, public consultation with the local community is strongly encouraged at the earliest stage of waste development proposals, with the process of consultation on planning applications set out in the Council's Statement of Community Involvement. It is also advised applicants enter into discussions with the Environment Agency regarding Environmental Permits at the earliest opportunity to assist in
			identifying and responding to any key issues, which may need to be addressed.
MM34	42	WDM2 (j)	j) The applicant must demonstrate any biodiversity enhancement has been fully investigated through an ecological assessment and adverse effects on European Designated Sites are avoided through appropriate mitigation; and
		6.12	"Where the ecological assessment (Criteria J of Policy WDM2) determines that adverse effects on the integrity of European Designated Site(s) cannot be avoided, the applicant must demonstrate that there are no suitable alternatives, that there are imperative reasons of overriding public interest for the project and that compensation can be delivered."
MM35	42	WDM2 (d)	d) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised, <u>and</u> <u>where possible and appropriate</u> , <u>enhancements made</u> , <u>onto</u> :
MM36	42	WDM2 (e)	The impacts of the proposed waste management facility are adequately assessed and the applicant can demonstrate that adverse effects are minimised, and where possible enhancement made, in terms of to:
MM37	44	6.14	The Council will resist the loss of existing facilities and allocated sites unless there is no realistic prospect of the site being used for waste management purposes exceptional circumstances can be demonstrated. Exceptional Particular circumstances will need to demonstrate how the loss of an existing facility, or development of an allocated waste site for another unrelated purpose, does not adversely affect the Council's ability to meet the District's waste management vision

Modification Number	Page No.	Policy / Paragraph	Proposed Modification
			and objectives.
MM38	44	WDM3	The Council will resist the loss of existing facilities and allocated sites through redevelopment or change of use for any other purposes other than waste management, unless the applicant can demonstrate any of the exceptional particular circumstances exist:
			a) There is no longer any identified need for the facility or site across any form of waste arising in the District and subregion, and such a facility could be accommodated elsewhere; or
			b) The facility or site does not accord with Bradford's core waste policies or cannot contribute to the waste hierarchy's objectives; or
			<ul> <li>c) The use of the facility or site for waste management activities are proved to be obsolete or economically unviable and market testing effectively demonstrates that other waste operators would not bring the site facility or site into use there is no realistic prospect of the site being used for waste management purposes; or</li> <li>d) An alternative, suitable waste facility site is identified elsewhere in the District enabling a site swap that is capable of satisfying the site location criteria for the waste management facility.</li> </ul>
MM39	45	6.15	The preferred policy sets out the objectives for the construction and operation of developments, principally relating to waste management.
MM40	45	6.16	6.16 All new and expanded developments will be required to demonstrate that any buildings associated with the development have regard to sustainable construction methods. Applicants should be mindful of environmental management regulations and best practice during the on-site use and recovery of CDEW to ensure it does not cause undue nuisance to surrounding communities.
MM41	45	WDM4	WDM4: Waste Management within Development  Proposals related to the expansion of existing and new developments will be permitted where they demonstrate:

Modification	Page	Policy /	Proposed Modification
Number	No.	Paragraph	
			a) The use of recycled and secondary materials for construction of the development, including the minimisation of waste
			resulting from construction;
			b) Energy efficient design, maximising, the on-site generation of electricity from the recovery and treatment of wastes and
			the provision of other renewable energy sources, including opportunities to contribute to climate change mitigation;
			c) Water efficient design, including where possible water recycling and sustainable drainage measures;
			d) That waste to be treated cannot practically and reasonably be reused, recycled or processed to recover materials;
			e) The appropriate management arrangements are in place for waste arisings generated by the development;
			f) Reduction in gases associated with adverse climate change;
			g) Design which minimises the disposal of waste and maximises the recovery and recycling of materials at the end of the development's life; and
			h) Maximise opportunities to contribute to climate change mitigation and priorities.
			Where demolition needs to take place before construction, as far as possible, construction and demolition waste should be
			recovered or recycled, preferably on-site. The applicant must also demonstrate the impacts of any proposed on-site
			management of construction and demolition waste are minimised in terms of:
			• Environmental, social or economic effects;
			• Human Health;
			• Noise, vibrations, dust, odour;
			Water, ground, light or air pollution; and
			Climate Change
MM42	47	WDM5	a) d) Residual landfill development proposals will be permitted where: a) Site specific impacts are adequately assessed and the applicant can demonstrate that adverse effects are minimised on:

Modification	Page	Policy /	Proposed Modification
Number	No.	Paragraph	
			Designated protected areas of landscape, historic or nature conservation including habitat loss or fragmentation;
			Visual and landscape amenity;
			• Floodplains, groundwater or water quality;
			• Transport accessibility, capacity and the need to travel <u>including investigating the potential of transporting waste by non-</u>
			road transport modes;
MM43	50	Objective 3	"To ensure that expansions to existing facilities where appropriate and new waste facility developments support the
			planned growth and waste needs of the Bradford community and are delivered in a manner which protects and, where
			appropriate, enhances the District's environmental assets and safeguards human health"
MM44	50	Objective 5	Objective 5: To work in collaboration with appropriate local authorities and waste industry operators to ensure that sub-
			regional waste (and if necessary beyond the subregion) issues are effectively considered and planned for in accordance with
			the duty to co-operate. Cross boundary issues including the movement of waste, transportation of waste arisings by
			sustainable transport modes and locating of facilities near to source must be managed and planned for collectively where
			possible