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# **Initial Sustainability Appraisal**

# Core Strategy: Waste Management Further Issues and Options

City of Bradford Metropolitan District Council

November 2008





#### HOW TO COMMENT

Bradford Council welcomes your comments on this Initial Sustainability Appraisal.

Consultation on a) the Core Strategy: Waste Management Further Issues and Options and b) Initial Sustainability Appraisal commences on **7 November 2008** for the period to **12 December 2008**.

Comments can be sent to the following freepost address:

Bradford Local Development Framework FREEPOST NEA 11445 PO Box 1068 BRADFORD BD1 1BR

Comments can also be:

- emailed to ldf.consultation@bradford.gov.uk
- faxed to 01274 433767
- handed in to the Planning Offices at Jacobs Well, Bradford or the Town Halls in Ilkley, Keighley and Shipley.

Please head the letter, email or fax **Initial Sustainability Appraisal** and clearly set out your comments.

The document will be made available in different formats on request.

If you have any queries regarding this document, or the Local Development Framework please do not hesitate to contact the Local Development Framework Group on (01274) 434950.

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#### **1.0 INTRODUCTION AND BACKGROUND**

This is the initial SA of the Core Strategy Waste Management Further Issues and Options paper produced by the City of Bradford Metropolitan District Council (CBMDC).

An integral part of preparing the Core Strategy is the Sustainability Appraisal (SA) process, which will have the aim of assessing the overall environmental, economic and social impact of the Strategy's objectives and policies. The appraisal is also required to comply with the European Union Directive 2001/42/EC, commonly known as Strategic Environmental Assessment (SEA), which requires an assessment of the effects of certain plans and programmes on the environment. The whole SA process exists to ensure that the Core Strategy, and in time other parts of the LDF, integrates environmental considerations into the preparation and adoption of plans with a view to achieving sustainable development.

Consultations on the 'Core Strategy Issues and Options' themed topic papers (including topic paper 8: Waste Management) took place in February-July 2007. A further consultation on the 'Core Strategy Further Issues and Options' were also carried out between January and March 2008. Both of these Issues and Options reports were accompanied by Initial SAs, which focused on the spatial strategy options of the plan. However, following consideration of the representations received on the consultations, and in response to further Government and the Planning Inspectorate advice on the waste management content of Core Strategy, a further consultation on the initial SA was deemed necessary.

The 'Core Strategy Waste Management Further Issues and Options' paper focuses on the strategic spatial Issues and Options for waste management across the District, feeding into the Core Strategy and Waste Management Development Plan Document (DPD) being undertaken by CBMDC. This paper seeks to generate discussion about the issues and opportunities for the location and type of facilities that are necessary to support the sustainable management of waste in Bradford.

The previous Core Strategy Topic Paper 8 (February 2007) introduced a series of "Issues and Options" and consulted on a number of key questions and options (Key question 8.1 to 8.7) relating to waste management across Bradford. Given the period of time since the publication of that document and this second issues and options report, these issues have been updated following consultations and additional key questions and options (Key question 8.8 to 8.13) have been developed to reflect the more recent position.

This second initial SA therefore focuses on these additional key questions and options only and provides stakeholders with more information to assist in choosing options and making further comments.

#### 2.0 INITIAL SA OF ADDITIONAL KEY QUESTIONS AND OPTIONS

This initial SA broadly follows a similar methodology developed for the earlier Core Strategy Issues and Options papers. It starts by assessing how the potential strategic and spatial options might perform against the draft SA framework and links the draft SA objectives to the additional questions and options posed in the further Issues and Options report.

The initial SA is in two sections accompanied by two appendices. The first section identifies the links between the Draft Sustainability Appraisal Objectives (Appendix 1) and the additional Key Questions and Options (Appendix 2) as set out in the 'Core Strategy Waste Management Further Issues and Options' paper. It also highlights the links of the options with the relevant SEA topic area and briefly summarises the advantages and disadvantages of each option. These are presented in Table 1.

The second section briefly summarises the potential environmental, social and economic impacts of the additional Key Questions and Options. This is presented in Table 2. The Draft Sustainability Appraisal Objectives have been used to prompt consideration of impacts related to different area of concern.

Although it is important that SA informs the process of identifying and choosing initial options and offers consultees additional information, it was not considered possible or appropriate to go into too much detail at this stage. The next stage of the planmaking process will be that of feeding information, from both the stake-holder consultation and the SA processes, into the developing and refining of plan options and assessing effects.

# TABLE 1: LINKS BETWEEN ADDITIONAL KEY QUESTIONS AND OPTIONS AND DRAFT SA OBJECTIVES AND SEA TOPIC

	Key Question 8.8: When looking to identify potential locations for new waste management facilities	should the Council?
н		

	Advantages	Disadvantages	Link to SA Objective	Link to SEA Topic
Option 1: Expand existing facilities	Easier to promote particular type of facility on a specific location based on current policies and criteria.	Existing waste sites may or may not be located in the most suitable locations. For example, existing sites may be far from centres of population, requiring waste to travel large distances. Any DPD setting out policies on the basis of existing facilities could be inflexible. The inflexibility could arise from the fact that it is unlikely that the current waste management facilities would be adequate to deal with increased volume of wastes and/or not appropriate to deal with certain type of wastes. Put pressure on existing infrastructure, which may be approaching capacity.	o SA 2 o SA11	<ul> <li>Water, Soil and Air</li> <li>Climatic Factor</li> </ul>

	acceptable in different areas, and public consultation is conducted on the basis that a range of different facilities will need to be developed in sustainable locations over a period of time.	Strategy to assist in the process of delivering viable solutions. Certain waste management facilities tend to be limited by the technology adopted. This could have considerable implications for choice of sites in terms of their location and achieving preferred level of distribution of waste management facilities.		○ Population and Human Health
Option 2: Use a different area of search using alternative criteria (see question 8.10 below)				
Option 3: Do not identify area of search in the Core Strategy and rely on criteria policy only	May be less controversial and simpler than option 1, and may also be seen as more objective and more flexible.	Does not give certainty to the developers, or the public of where facilities could be located Will continue to compete with other employment uses Likely to lead to more challenges on the ground that there could be more suitable locations elsewhere.	<ul> <li>○ SA5</li> <li>○ SA6</li> <li>○ SA11</li> </ul>	<ul> <li>Biodiversity, Flora and Fauna</li> <li>Cultural Heritage and Landscape</li> <li>Population and Human Health</li> </ul>

	Advantages	Disadvantages	Link to SA Objective	Link to SEA Topic
Option 1: Remove existing road network and urban areas	More responsive to local needs regardless of the potential infrastructural constraints.	Choice of locations may result in higher infrastructural investment potentially affecting local communities and the environment.	∘ SA5 ∘ SA6	<ul> <li>Biodiversity, Flora and Fauna</li> <li>Cultural Heritage and Landscape</li> </ul>
Option 2: Remove environmentally sensitive areas	Allows facilities to be located in areas which may best suited for waste management facilities.	Could lead to development on unsustainable and environmentally sensitive locations.	<ul><li>○ SA5</li><li>○ SA6</li></ul>	<ul> <li>Biodiversity, Flora and Fauna</li> <li>Cultural Heritage and Landscape</li> </ul>
Option 3: Keep layers as they are	Provides a more tailored approach than Option 1 and 2 without becoming unduly complex. Considering the significant differences between different types of waste management facilities, this approach is more likely to deliver the right facilities in the right places.	May tend to introduce very tight constraints which disadvantage waste management relative to other economic activities (by, for example, introducing a presumption against a benign waste management process in a shed in the countryside that would not apply to a directly comparable industrial or agricultural process). More work is required and the Core Strategy could become more complex.	<ul> <li>○ SA5</li> <li>○ SA6</li> <li>○ SA11</li> </ul>	<ul> <li>Biodiversity, Flora and Fauna</li> <li>Cultural Heritage and Landscape</li> <li>Population and Human Health</li> </ul>

	Advantages	Disadvantages	Link to SA Objective	Link to SEA Topic
	Any new criteria could make the policy (not necessarily its	Any lack of clarity can lead to more disputes, and hence delays.		
	implementation) simpler to deliver.	New criteria could make the process even more complex.		
•	nould there be exceptions to the indicative a facilities within quarries, landfill sites, redu	reas of search as shown on the Fig		-
	Advantages	Disadvantages Certain sites may be suitable only for specific types of waste	Link to SA Objective	Link to SEA Topic
	Advantages			

Key Question 8.13: Should the distance from the strategic road network be 1km, another variable, or used less strictly as a preference rather than a constraint?

	Advantages	Disadvantages	Link to SA Objective	Link to SEA Topic
Option 1: 1km as it is Option 2: Another variable (suggest) Option 3: 1km used less strictly as a general preferred distance	Makes good use of existing transport infrastructure and reduces transport to/from and between complementary processes.	May limit the opportunities to achieve a preferred degree of (de)centralization (and, by implication, the scale of operation)	∘ SA3 ∘ SA11	<ul> <li>Climatic Factor</li> <li>Population and Human Health</li> </ul>

## TABLE 2: SUMMERY OF INITIAL SUSTANABILITY APPRAISAL

#### Appraisal scoring System:

Symbol	Meaning
+	Positive effect on the Sustainability Objective(s)
++	Very positive effect on the Sustainability Objective(s)
0	Neutral effect on the Sustainability Objective(s)
-	Negative effect on the Sustainability Objective(s)
	Very negative effect on the Sustainability Objective(s)
?	Uncertain effect on the Sustainability Objective(s)

# Key Question 8.8: When looking to identify potential locations for new waste management facilities should the Council?

	Summery of Initial SA	Score
Option 1: Expand existing facilities	<ul> <li>Location of waste management facilities is not relevant as the option focuses on expanding the existing facilities on their current location. This could positively contribute towards managing current stream of wastes without much adversely affecting the available land resources, but this would inevitably lead to an increase in HGVs needed to transport waste, which will continue to have a negative impact on the neighbouring community and local environment. Moreover, continuing some of the existing means of waste management e.g. landfilling outside the district are not environmentally sustainable or financially viable.</li> <li>Expansion of the existing facilities could have a negative impact on providing local facilities for some small settlements (e.g those in rural areas) who currently do not have such facilities.</li> </ul>	+/

Option 1: Use areas of search as identified on Figure 11	The location of additional waste management facilities within or in close proximity to major urban areas and settlements will encourage local communities to take more responsibility for the waste they generate, as urban areas in Bradford are where the greatest amount of waste is produced. Furthermore, locating waste management facilities within or in close	++
	Summery of Initial SA	Score
Key Question 8.9: Do you agree with the	indicative Area of Search for waste management facilities or not?	
Option 3: Both of the above maximising opportunity and need	This option benefits from the other two options and maximises all available opportunities and needs. However, any reduced choice of locations may result in lower levels of investment.	++
	Furthermore, the main concentrations of opportunity sites for waste management facilities are within urban areas and the most environmentally sensitive areas in the district lie in the north, west and south-western boundaries. As such, any potential location of additional waste management facilities within or in close proximity to these urban areas will have a significant positive effect on avoiding a net loss of the most environmentally sensitive areas in Bradford.	
Option 2: Identify new sites	The location of additional waste management facilities within or in close proximity to major urban areas and settlements will encourage local communities to take more responsibility for the waste they generate, as urban areas in Bradford are where the greatest amount of waste is produced. Furthermore, locating waste management facilities within or in close proximity to urban areas and settlements corresponds with the national policy objective of communities taking more responsibility for their waste; equally it is more sustainable to locate facilities close to the source of waste.	++/-

	proximity to urban areas and settlements corresponds with the national policy objective of communities taking more responsibility for their waste. The location of additional waste management facilities within or in close proximity to major urban areas and settlements will also have a significant positive effect on maximising the use of previously developed land in Bradford.	
	Moreover, the main concentrations of opportunity sites for waste management facilities are within these urban areas. The most environmentally sensitive areas in the district lie in the north, west and south-western boundaries. As such, the location of additional waste management facilities within or in close proximity to these urban areas will have a significant positive effect on avoiding a net loss of the most environmentally sensitive areas in Bradford.	
	However, with a spatial strategy that is concentrated on urban areas, some rural settlements will have to travel further to treat certain types of waste, although certain types of waste management facility may be more appropriate in rural areas (i.e. composting). As such, the location of additional waste management facilities within or in close proximity to major urban areas and settlements could potentially have a negative effect on providing local facilities to minimise the distance travelled to handle and treat wastes in rural areas.	
Option 2: Use a different area of search using alternative criteria (see question 8.10 below)	See key question 8.10	
Option 3: Do not identify area of search in the Core Strategy and rely on criteria policy only	The Core Strategy will not identify specific locations but should provide spatial guidance for the Waste Management DPD to deliver sufficient and suitable land allocations to support the waste strategy set out in the RSS and in the Core Strategy. It is unlikely however that it would be possible to identify sufficient sites in the Waste Management	+/-

Kay Question 9.10. Are the bread second	DPD to cater for all possible circumstances so the Core Strategy may need to set out the criteria which will be used to judge the merits of individual planning applications for new waste management facilities for particular types of waste. However, undue application of policies could result in a higher concentration of waste management facilities in one area thereby creating greater negative impacts on the environment and local amenity. It is also important to note that, some types and sizes of facilities are likely to be more suitable in certain types of location than others, particularly if they are to be located outside the main urban areas.	
Rey Question 6.10. Are the broad search	n criteria adopted in this paper appropriate? Summery of Initial SA	Score
Option 1: Remove existing road network and urban areas	Concentrating 'area of search' outside the major urban areas and settlements would lead to environmentally sensitive areas including green belt, agricultural land, protected floodplains and associated watercourse. As such, the location of additional waste management facilities outside major urban areas and settlements could potentially have a negative effect on the protection and enhancement of designated sites of environmental and ecological importance. However, impacts are likely to vary depending on the type of facility and proximity of the sensitive sites.	
Option 2: Remove environmentally sensitive areas	There are high concentrations of listed historic buildings in major urban areas and settlements, particularly in city and town centres. As such, the location of additional waste management facilities within or in close proximity to major urban areas and settlements could potentially have a negative impact on protecting and enhancing the natural and built historic environment if site specific opportunities for locating new waste facilities are not assessed to determine their historic value and more sensitive areas avoided in the first instance.	
	Moreover, depending on the location and designs, additional waste management facilities could also affect the urban landscape quality. Whilst the location of additional waste	

	The scope of the SA depends upon the criteria to be considered. For example, if the criteria is to be based on the different 'types' of waste management facilities, it should be noted that it is possible to control many potentially adverse impacts such as noise, litter, air emissions through mitigation or enclosed facilities, as opposed to open facilities. On the other hand, if it is to be based on 'location' of potential sites, it is important to consider	?
	Summery of Initial SA	Score
Key Question 8.11: Are there any bro	ad criteria that should be on the plan that are not, if so what?	
Option 3: Keep layers as they are	This option benefits from the other two options and maximises available opportunities and needs. However, any reduced choice of locations may result in lower levels of investment.	++
	All four Air Quality Management Areas (AQMAs) in Bradford are within or in close proximity to large urban settlement, and so any additional waste management facilities in these areas could potentially have a negative effect on air quality. However, there is a degree of uncertainty when considering the effects of atmospheric pollution from waste management facilities, as some new technologies will not create emissions and other may be subject to control under the Waste Incineration Directive and will require PPC licenses. Furthermore, impacts from waste management activities on air quality depend on the type of waste management facility, i.e. thermal treatment facilities will result in a higher level of atmospheric pollution. As such, the effect of additional waste management facilities within or in close proximity to major urban areas and settlements is considered to be uncertain.	
	management facilities on industrial sites and on particular areas of PDL may be consistent with townscape character, those located in close proximity to major urban areas and settlements in these areas could potentially have a negative effect on the overall landscape quality.	

	<ul> <li>population, and will require particular balancing of amenity and disturbance issues.</li> <li>Location and size of waste management facilities could also depend on the type of the facilities.</li> <li>However, HGV and small vehicle traffic is inevitable from almost all facilities and will have some effects.</li> </ul>	
-	eptions to the indicative areas of search as shown on the Figure 11 (for example to allouarries, landfill sites, redundant agricultural buildings, or other existing complementary	
	Summery of Initial SA	Score
	Significant impacts are more likely to result from broad locations that are based on landfill/minerals sites and agricultural and forestry buildings as these locations are in rural areas and likely to be in closer proximity to environmentally sensitive sites. Mineral voids only exist where minerals have been extracted and these are generally in rural locations, there can be advantages of landfilling these voids as it may bring back land into agricultural use. Minerals sites and agricultural buildings will impact smaller communities, but will incur greater environmental impact (e.g. greater greenhouse has emissions) from HGV traffic due to longer travel distances. Those located reasonably close to rural communities may be suitable, but some sites may be too remote to act as local service points. Certain minerals sites and agricultural buildings are within or in close proximity to environmentally sensitive areas, whilst others are outside, resulting in mixed effects. However, the actual effects are dependent on site locations.	+/-

	existing air quality, where additional enclosed facilities may not degrade the District's National Air Quality status. The potential for dust generated by the operations should be considered however. All location options could potentially contain historic buildings of value, and minerals sites or agricultural buildings may also contain historic settings or landscapes of value. Therefore, potential sites for waste management facilities should be assessed to determine their historic value. Special consideration to siting and design of the facilities within or near historic environments may mitigate impact.	
-	distance from the strategic road network be 1km, another variable, or used less strictly as a prefe	erence
rather than a constraint?	Summery of Initial SA	Score

	important in the first instance to ensure that facilities using road transport are located close to the primary road network, so as to reduce the negative effects on communities and the environment.	
Option 2: Another variable (suggest)	The greater the distance, the higher the impacts are likely to be. For locations closer to the strategic road network, the overall effect is likely to be reduction in total transport distance and associated impacts such as noise and emissions. Closer location will have less financial implications in terms of infrastructure investment and/or upgrading the existing network.	?
Option 3: 1km used less strictly as a general preferred distance	However, as mentioned before, HGV and small vehicle traffic is inevitable from almost all facilities regardless of the distance from the strategic road network and will have some effects. New or additional waste management sites, located at shorter distances from the urban centres where most waste will be generated, may reduce transportation requirements, and thus greenhouse gas emissions.	+

APPENDIX 1: Core Strategy Draft Sustainability Appraisal Objectives		
SA Objectives		SEA Topic Covered
Energy and Resources		
SA1	Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy.	<ul><li>Water, Soil and Air</li><li>Climatic Factors</li></ul>
SA2	Minimise the growth in waste and increase the amount of waste which is re-used, re-cycled and recovered.	<ul><li>Water, Soil and Air</li><li>Climatic Factors</li></ul>
	Response to Climate Change	
SA3	Reduce the districts impact on climate change and vulnerability to its effects.	<ul><li>Water, Soil and Air</li><li>Climatic Factors</li></ul>
	Air, Soil and Water Quality	
SA4	Safeguard and improve air, water and soil resources.	<ul> <li>Biodiversity, Flora and Fauna</li> <li>Water, Soil and Air</li> </ul>
	Natural Assets	
SA5	Conserve and enhance the internationally, nationally and locally valued wildlife species and habitats	<ul> <li>Biodiversity, Flora and Fauna</li> </ul>
SA6	Maintain and enhance the character natural and manmade landscapes	Cultural Heritage and Landscape
	Housing	
SA7	Provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources.	<ul> <li>Population and Human Health</li> </ul>
	Transport	
SA8	Develop and maintain an integrated and efficient transport network which maximizes access whilst minimizing detrimental impacts.	<ul> <li>Population and Human Health</li> <li>Climatic Factors</li> </ul>
SA9	Reduce congestion and pollution by increasing transport choice and by reducing the need to travel by lorry / car.	<ul> <li>Population and Human Health</li> <li>Water, Soil and Air</li> <li>Climatic Factors</li> </ul>
Land Use		
SA10	Improve the quality of the built environment and make efficient use of existing land and buildings.	<ul> <li>Population and Human Health</li> <li>Water, Soil and Air</li> <li>Cultural Heritage and Landscape</li> </ul>
Accessibility and Local Needs		
SA11	Improve the quality and range of services available within communities and connections to wider networks.	<ul> <li>Population and Human Health</li> </ul>

Communities		
	Promote social cohesion, encourage	Population and Human
SA12	participation and improve the quality of	Health
	deprived neighbourhoods.	
	Culture, Leisure and Recreation	
	Create good cultural, leisure and recreation	<ul> <li>Population and Human</li> </ul>
SA13	activities available to all.	Health
3413		<ul> <li>Cultural Heritage and Landscape</li> </ul>
	Safety and Security	
SA14	Improve safety and security for people and	Population and Human
5414	property.	Health
Health (and Social Welfare)		
	Provide the conditions and services to improve	<ul> <li>Population and Human</li> </ul>
SA15	health and well-being and reduce inequality to	Health
	access to health and social care.	
	Education and Training	
	Promote education and training opportunities	<ul> <li>Population and Material</li> </ul>
SA16	which build the skills and capacity of the	Assets
	population.	
Local Economy and Employment		
	Increase the number of high quality job	<ul> <li>Population and Material</li> </ul>
SA17	opportunities suited to the needs of the local	Assets
	workforce.	
	Support investment and enterprise to develop a	<ul> <li>Population and Material</li> </ul>
SA18	dynamic, diverse and knowledge based	Assets
UAIU	economy, excelling in innovation with higher	
	value and lower impact activities.	

### **APPENDIX 2: Waste Management Issues and Options**

The previous Waste Management Issues and Options paper (February 2007) consulted on a number of key questions and options, as summarised below.

#### Previous key questions:

- 8.1 How can the LDF promote waste minimisation and re-use?
- 8.2 How can the forthcoming Waste DPD help assist in the Bradford District reaching its recycling targets set by Government?
- 8.3 What additional waste management facilities are needed for the different types of waste that are produced in the Bradford District?
- 8.4 Are there any types of waste for which there are sufficient facilities?
- 8.5 In which areas of the Bradford District should these waste management facilities be located?
- 8.6 Should we identify the major waste facilities that may be required and allocate sites for these?
- 8.7 Should we have a site selection criteria as well as identifying the major waste facilities?

#### Further key questions and options to consider:

In focusing on broad locations for waste management facilities across Bradford we have developed a number of additional key questions and options. We would like your views on these additional key questions and options.

- 8.8 When looking to identify potential locations for new waste management facilities should the Council?
- Option 1: Expand existing facilities
- Option 2: Identify new sites
- Option 3: Both of the above maximising opportunity and need
- 8.9 Do you agree with the indicative Area of Search for waste management facilities or not?
- Option 1: Use areas of search as identified on Figure 11
- Option 2: Use a different area of search using alternative criteria (see question 8.10 below)
- Option 3: Do not identify area of search in the Core Strategy and rely on criteria policy only

- 8.10 Are the broad search criteria adopted in this paper appropriate?
- Option 1: Remove existing road network and urban areas
- Option 2: Remove environmentally sensitive areas
- Option 3: Keep layers as they are
- 8.11 Are there any broad criteria that should be on the plan that are not, if so what?
- 8.12 Should there be exceptions to the indicative areas of search as shown on the Figure 11 (for example to allow for the development of waste facilities within quarries, landfill sites, redundant agricultural buildings, or other existing complementary land uses), if so why?
- 8.13 Should the distance from the strategic road network be 1km, another variable, or used less strictly as a preference rather than a constraint?
- Option 1: 1km as it is
- Option 2: Another variable (suggest)
- Option 3: 1km used less strictly as a general preferred distance





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