

Local Development Framework for Bradford

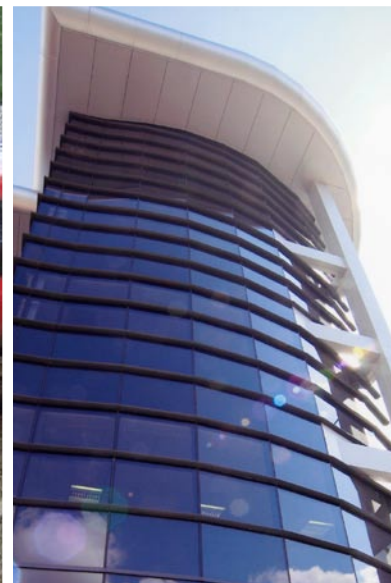
Core Strategy

Further Issues and Options

Summary of Representations

Waste Management Further Issues and Options and Initial Sustainability Appraisal

March 2009



City of Bradford MDC

www.bradford.gov.uk

CORE STRATEGY - FURTHER ISSUES & OPTIONS
WASTE MANAGEMENT & INITIAL SUSTAINABILITY APPRAISAL
SUMMARY OF REPRESENTATIONS

INTRODUCTION

As required by The Town and Country Planning (Local Development) (England) 2004 Regulations as amended, consultations have been carried out on the Core Strategy Further Issues & Options in accordance with Regulation 25. The Regulations require Local Planning Authorities to consider any representations made within a six-week period of consultation and to have regard to them when preparing a Development Plan Document for submission to the Secretary of State.

Following consideration of comments received to Topic Paper 8: Waste Management, and to take account of changes to the national and regional policies, the Council felt it necessary to revise the documents relating to waste management and to provide more information to assist the stakeholders in choosing options and making further comments, prior to the preparation of the Preferred Options document.

Approximately 96 organisations and individuals were notified by letter about the Waste Management Further Issues & Options and Initial Sustainability Appraisal consultation along with the availability of the consultation reports. Copies of the reports were placed on the Council's website for viewing and downloading and copies were made available upon request. The circulation list is included within this report along with a further list of those who made a written representation.

The attached Schedule of Representations sets out in tabular form the representations from the 13 bodies, organisations and individuals who submitted written representations during the consultation period.

The attached schedule is divided into the following sections:

- 1) A list of consultees
- 2) A list of those who submitted written representations
- 3) A schedule of written representations to the Waste Management Further Issues and Options
- 4) A schedule of written representations to the Initial Sustainability Appraisal

1.0 LIST OF CONSULTEES

1.1 The following people were specifically contacted as part of the further consultation on the Waste Management, Sustainability Appraisal and Topic Paper 7: Environment (Minerals) Update. Please note that the majority of these contacts will be duplicated from the previous consultation lists.

- A & S
- Aggregate Industries UK
- Airedale Partnership
- Allan Bailey
- ASHLAR stone products
- Associated Waste Management Limited
- Autospares Bingley Limited
- Bank Top Quarry
- Bedminster International (UK) Limited
- Berry And Marshall (Bolton Woods) Limited
- Biffa Waste Services Ltd
- Biogonix Ltd
- Birks Royd Stone
- Bradford Chamber of Commerce & Industry
- Bradford Hospitals NHS Trust
- Bradford Organic Composting Scheme
- Bradford Waste Traders
- Bradley Natural Stone Products
- CBCMDC – Department of Regeneration (Dockfield Road)
- CBMDC - Environment & Neighbourhoods
- CBMDC - Waste Project
- CEMEX UK Operations
- Charles Raistrick
- Colas Ltd
- Combined Masonry Supplies
- Covanta Energy Limited
- CPRE Bradford District
- Cullingworth Parish Council
- Darrington Quarries Ltd
- Denholme Residents Action Group
- Denholme Town Council
- Dennis Gillson and Son
- Dennis Gillson And Son (Haworth) Limited
- Dial A Skip Service Limited
- Dolmens
- ENER-G plc
- English Heritage
- Ennstone Johnstone
- Environment Agency
- Erlings Works
- Fairport Engineering Ltd
- Farrar Natural Stone
- George M Watson (Construction) Limited
- Gill Demolitions
- GW Butler Limited
- Hanson Aggregates
- Hard York Quarries Ltd
- Harry Sanders Ltd
- Highways Agency, Yorkshire & Humber
- John Hornby And Sons Limited
- Keighley Town Council
- Lafarge Aggregates & Concrete UK
- Leeds Environmental Organisation Limited
- Leeds Friends of the Earth

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- M & G Stone Ltd
- Midgeham Cliff End Quarry Ltd
- Miles J Delaney
- Mineral Resources (Yorkshire) Limited
- Mr Bryan Scott
- Myers Group
- Natural England
- Northern Stone & Paving Co
- Omega Proteins Ltd
- Orchid-environmental
- P Casey (Enviro) Limited
- P Waddington And Sons Ltd
- Parkinson Spencer Refractories Ltd
- Quarry Products Association
- Russell Stone Merchants
- S M Building Products
- Shanks
- Shipley Stone Sales
- Sibelco UK
- SITA UK Limited
- Skipton Properties
- Sterecycle
- Stone Federation Great Britain
- Tarmac Northern Limited
- TEG Environmental Ltd.
- The Bingley Stone Company
(Yorkshire) Ltd
- The British Aggregates Association
- Thomas Crompton Developments Ltd
- University Of Bradford - Estates And
Facilities
- Veolia Environmental Services Plc
- VISTA ENVIRONMENTAL LIMITED
- Soil Hill
- W E Leach
- Waste Recycling Group Limited
- West Riding Crushing Services
- West Riding Waste Disposal Limited
- WRG
- Yorkshire Aggregates Ltd
- Yorkshire and Humber Assembly
- Yorkshire Poultry Products
- Yorkshire Water Services Ltd
- Yorwaste Ltd

2.0 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

A list of consultees that submitted general comments to the Waste Management and the Initial Sustainability Appraisal consultation documents as part of the Further Issues and Options stage of the Core Strategy.

1. Yorkshire Wildlife Trust
2. ENCIA Environment Limited on behalf of Bio-Gen Power Limited
3. English Heritage
4. Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)
5. Government Office for the Yorkshire and Humber
6. Yorkshire Water
7. SITA UK
8. Highways Agency
9. ARUP on behalf of Aire Valley Environmental
10. Waste Recycling Group
11. WDA
12. Yorkshire & Humber Assembly
13. Natural England

3.0. SCHEDULE OF WRITTEN REPRESENTATIONS TO THE WASTE MANAGEMENT FURTHER ISSUES AND OPTIONS DOCUMENT

General Comments		
Rep ID	Name / Organisation	Summary of Representation to Waste Management Further Issues and Options
5	Government Office for Yorkshire and Humber	1. We note that you have addressed our comments of 18 March concerning consultation on the key issue of providing strategic waste facilities in accordance with PPS10 and the European Waste Directive.
		2. The document contains very little on European legislation about waste and waste disposal. This sets a framework and targets to hit for recycling, composting and diversion of waste from landfill. These targets will direct action by the Council and we therefore suggest that in the forthcoming documents, fuller reference will be needed to European waste policy and legislation (without repeating policy), particularly the Landfill Directive. This also applies to UK waste policy legislation where not already mentioned, e.g. the Landfill Tax Regulations 1996; the Household Waste Recycling Act 2004; National Waste Strategy.
		3. There should be coherence and consistency with the LDFs prepared by neighbouring authorities, where cross-boundary issues are relevant. You might wish to expand details of cross-boundary waste movements, e.g. is there any scope for joint working with neighbouring authorities in the consideration of methods of disposal, appropriate sites, etc.? Is there any scope for sub-regional working? You also need to ensure that you have carried out effective consultation on cross-boundary issues.
		4. At the next stage you may wish to consider adding some wording about opportunities to co-locate facilities together with complimentary activities, e.g. if Combined Heat and Power is to be developed then consideration needs to be given to the location in respect of the likely receptors of the heat generated.
		5. At submission, the Core Strategy will need to demonstrate sufficient flexibility to accommodate known and unexpected changes, including methods of waste management.
		6. We understand that the Issues and Options Report is primarily concerned with the management of municipal solid waste, and that agricultural and hazardous waste will be dealt with in the Waste DPD. RSS Policy ENV13 and para 10.74 say that

General Comments		
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		<p>waste planning authorities should take into account that the existing range of facilities for dealing with hazardous waste will need to change to provide for more treatment and less landfill, and that there will be significantly more hazardous waste in the overall regional waste stream. With this in mind you may wish to be aware of the judgement in <i>Associated British Ports v Hampshire County Council & Others</i> (4 July 2008). The High Court held that certain policies in the Hampshire County Council Waste and Minerals Core Strategy were unsound in that they had not identified the broad locations of sites (albeit not details of specific sites) and, more relevant here, the judgement also commented on the need to take tough decisions in a core strategy and not leave them to lower tier DPDs. I am also enclosing a copy of the recent note of the Exploratory Meeting into Newcastle's Core Strategy, paras 25-30 of which contain the Inspector's comments on the waste elements of the Core Strategy (see also para 31 on minerals). He commented that the Core Strategy was deficient in that it failed to refer to hazardous waste. Although this is specific to Newcastle, you may find it helpful in plan preparation.</p> <p>7. We note the Inspector's comments from the PINS Advisory visit, which he copied to GOYH, and would particularly draw your attention to his comments on the Core Strategy and the Waste DPD.</p>
8.	Highways Agency	<p>The Agency's key concern is to protect the primary role of the Strategic Highways Network (SNR) and to ensure its safe and efficient operation. The Agency would therefore have concerns over any development proposals or plans which would have a material impact on this. As you will be aware, the M62 and M606 form part of the SNR in the Wakefield District.</p> <p>Firstly, it is important to identify the capacity issues currently evident on the SNR with Bradford district.</p> <p>The M62 suffers from significant capacity constraints and severe queuing between Junctions 24 (Huddersfield/Halifax) and 27 (M62/M621 intersection) during peak periods. Traffic flows more freely in the westbound direction than eastbound.</p> <p>The M606 experiences queuing at the two interfaces with the local highway network – on the southbound slip road to the M62 and the roundabout junction at Chain Bar, and on the northbound approach to Staygate junction where peak period traffic levels on the District principal road network contribute to the development of a northbound traffic queue.</p>

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		The Core Strategy options being developed by Bradford and neighbouring authorities in West Yorkshire, and the potential impact of additional housing requirements expect as a result of the RSS review, will result in additional traffic on the M62, M606 and other parts of the SRN. The ongoing dialogue between the Agency and the West Yorkshire Local Planning Authorities is designed to ensure that these impacts are addressed.
11.	WDA	<p><u>Further Issues & Options Paper. Page 10:</u> Second bullet point relating to search criteria; “1 km of existing road network...”. Does this mean any road network or major or strategic road network? The point needs clarifying.</p> <p><u>Further Issues & Options Paper. Page 10:</u> On the third bullet point, would not most of the suggested possible locations be in green belt and not urban centres? Also in consideration of excluded areas (sensitive areas) do major aquifers need to be considered?</p> <p><u>Further Issues & Options Paper. Page 12:</u> Could insert; “A sustained waste awareness campaign has been introduced since 2002 aimed at increasing the general public’s knowledge of waste issues and promoting the waste hierarchy”. Also our published recycling performance 07/08 = 24%. 52,000 t (recycled) / 212,000 (domestic arising) = 24%.</p> <p><u>Further Issues & Options Paper. Page 12:</u> The last point on page 12 (ie. increasing to 50%) will require the provision of new waste treatment facilities for the treatment of Bradford’s residual household wastes (ie. that which currently goes to landfill) in order to assist the council in achieving the 50% target in 2020.</p> <p><u>Further Issues & Options Paper. Page 13:</u> Can you confirm in the text the source data of the waste tonnages 2010, 2015, and 2020?</p> <p><u>Further Issues & Options Paper. Page 14:</u> Short term; second bullet point – I would rephrase this to say “seeking a short term (typically 5 years) contract to treat a proportion of the council’s residual municipal wastes to generate a number of recyclable products”. Long term, the start date of</p>

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General Comments		
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		2010-2012 is incorrect. A date of 2014/15 should go in as an anticipated date. Delete "at the latest".
		Further Issues & Options Paper. Page 15: Can you confirm the source data of these tonnage values?

Question 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		
Rep ID	Name / Organisation	Summary of Representation
1.	Yorkshire Wildlife Trust	Option 3: Both of the above maximising opportunity and need. By applying policies to conserve and enhance biodiversity this option should give the most opportunities to provide sustainable facilities.
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)	It is considered that the Council should in the first instance seek to utilise the potential for developing existing waste management facilities. This has significant benefits in terms of: <ul style="list-style-type: none"> - Established waste management land use (in planning terms); - Established highway infrastructure and routing of vehicles; - Established facility for customers; - Local acceptance of the site for waste management use; and - Sustainable use of existing assets.
		The existing Council owned site at Bowling Back Lane in Bradford for example is an established key municipal waste

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		<p>management site which has the potential for development of a large scale, integrated waste management facility – incorporating elements such as recycling and recovery with the potential for physical and/or thermal treatment of waste to facilitate energy recovery. The site is situated within an existing industrial area and is of sufficient size to facilitate development of this nature (see Appendix 1 which stipulates waste management facility land requirements). Such a facility could make a significant contribution to the level of waste treatment and recovery capacity required to manage the future municipal and commercial waste arisings within Bradford, allowing the District to become more self sufficient in managing its own waste.</p> <p>In addition to focusing on opportunities to develop existing waste management facilities, the Council should also ensure that existing waste management sites that will continue to contribute significantly to municipal and commercial waste management infrastructure in the future are safeguarded. Furthermore, opportunities to develop these sites (e.g. to increase operational efficiency and/or to maximise opportunities for recycling and recovery of waste) should be supported.</p> <p>The existing Council owned site at Royd Way in Keighley for example is an established waste transfer station which plays a key part in the existing municipal waste service delivery. The site has the potential to contribute significantly to the future management infrastructure in Bradford and also has the potential for investment/redevelopment (e.g. to provide additional recycling and recovery infrastructure, moving the management of waste further up the waste hierarchy). The site is within an existing industrial area and is of sufficient size to facilitate development of this nature.</p> <p>The above discussion demonstrates that at least two of the existing waste management facilities within Bradford should be identified as sites where retention/development is to be supported. In terms of question 8.8 overall, it is considered that the approach should be selective support for existing sites (i.e those are appropriate in planning terms) and new sites in suitable locations. ETS therefore supports Option 3 above.</p>

Question 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		
Rep ID	Name / Organisation	Summary of Representation
6.	Yorkshire Water	Option 3 would seem the most appropriate if Bradford is to maximise flexibility within its waste management strategy and to also allow for the broadest range of locations to be examined. Option 1 would potentially rule out a number of sites which could otherwise be suitable including those where a complementary activity currently takes place. Adoption of option 3 would not rule out the expansion of existing facilities where appropriate but would ensure that the most sustainable locations within the district are assessed on their own particular merits. A more flexible approach would also better cater for the likely scale and nature of growth, which as the consultation paper makes clear, is likely to occur within the District over the next fifteen years.
8.	Highways Agency	<p>Much of the landfill waste, waste destined for treatment plants and waste for reclamation generation in Bradford District is transported to locations elsewhere in West and South Yorkshire. A substantial proportion of that traffic is likely to be routed via the SRN. If no action is taken, the amount of 'Bradford waste' traffic routed via the SNR will continue to increase. Hence, the Agency supports the policy principle of increased self-sufficiency in terms of waste treatment and disposal as this will reduce HGV traffic on the SNR</p> <p>The Agency has no particular views on the options for choosing new waste management facilities – expanding facilities, identifying new sites or a combination of both – or on the most appropriate distance of sites from main roads.</p>
9.	ARUP on behalf of Aire Valley Environmental	<p>For Bradford to take responsibility for the waste it generates and move the management of waste up the waste hierarchy, it will need to enable the provision of a range of waste management facilities. This will include facilities which range in scale as well as type of operation.</p> <p>This will require both the modernisation and expansion of existing facilities (where considered appropriate and achievable in relation to their surrounding land uses) and the provision of new facilities to provide new technologies and manage the</p>

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		<p>scale of waste arising. This is because as more waste is treated and recycled in the District and enables movement up the waste hierarchy, generally larger total footprints for sites will be needed, so either more sites or larger sites will be required to meet future needs.</p> <p>It is therefore considered that the Council should look at both expanding existing facilities and identifying new sites to maximise opportunity and need (Option 3).</p>
10.	Waste Recycling Group	<p>3) Both of the above maximising opportunity and need.</p> <p>We consider that Option 3 should be taken forward. This would allow for both expanding existing facilities and identifying new sites for waste management activities. We would like to suggest that existing areas of waste management activity should take priority, but ensuring that any new development on these sites encompasses regeneration principles.</p>
11.	WDA	<p>8.8 would favour option 3 of expanding existing facilities and identifying new ones.</p> <p>However, in commenting on 8.8, the map in figure 9 precluding environmentally sensitive areas from any waste development does not seem to strike a “balanced approach” when such sensitive areas include green belt. It is clear certain waste facilities (even taking account of proximity principle and PPS10) do not easily sit in an urban area, because of potential negative impact on nearby populations. The ability to develop in green belt by demonstrating “very special circumstances” may continue to prove too tough a test (or constraint) to achieve the PPS10 aspirations of providing sufficient opportunities for new waste management facilities of the right type, in the right place and at the right time. There are certainly significant areas as shown in figure 10 that are potentially suitable (being within 1 km of strategic roads) and outside the urban area, but in green belt.</p>

Question 8.8: When looking to identify potential locations for new waste management facilities should the Council?		
<p>- Option 1: Expand existing facilities</p> <p>- Option 2: Identify new sites</p> <p>- Option 3: Both of the above maximising opportunity and need</p>		
Rep ID	Name / Organisation	Summary of Representation
		It is accepted that otherwise such waste development should not be in or adjacent to areas listed in the natural environment (e.g. SSSI), taking account of the comments or green belt and strategic roads above, and also not in or adjacent to areas of Historical Heritage.
13.	Natural England	<p>Natural England would prefer to see Option 3 pursued.</p> <p>A combination of expanding existing facilities and identifying new sites would maximise the potential for finding the most sustainable locations for waste facilities, allowing flexibility to consider the cumulative impacts of co-location of facilities at existing sites, as well as the potential of new sites in less sensitive locations. However, all sites must consider the physical and environmental constraints on development and whether cumulative effects can be fully mitigated or avoided.</p> <p>We would also point out that the RSS places co-location of complementary activities at the top of a hierarchy of potential locations for sites in Policy Env15, followed by use of previously developed land, including existing landfill sites. This would infer that there should be a tendency towards using existing facilities (wherever sustainable) before other sites are considered.</p>

Question 8.9: Do you agree with the indicative Area of Search for waste or not? - Option 1: Use Areas of Search as identified using alternative criteria (see question 8.10 below) - Option 2: Use a different area of search - Option 3: Do not identify area of search in the Core Strategy and only reply on criteria policy only		
Rep ID	Name / Organisation	Summary of Representation
3	English Heritage	Insofar as they go, we would broadly endorse the approach to identifying Areas of Search for waste management facilities. However, it is essential that the DPD sets out a framework requiring a detailed assessment to be undertaken of potential sites within the “white” areas in order to ascertain whether or not the development of these areas for waste management facilities will be likely to have an adverse impact upon not just the historic assets set out page 19 of the Report, but also other elements of the District’s historic environment.
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)	It is considered appropriate that the Council should identify indicative areas of search for waste management facilities within Bradford. ETS supports the Council’s approach that the search should be confined to the administrative area, in accordance with the self sufficiency principal and in line with PPS 10, the Waste Strategy 2007 and the Yorkshire and Humber Plan.
		The broad criteria adopted by the Council in order to define the indicative areas of search (as shown in Figure 11) are considered appropriate. Furthermore, the comments made in the interim Sustainability Appraisal (on page seven) that the use of indicative areas of search provides transparency and gives developers knowledge in advance of where development is/is not likely to be acceptable are supported.
		In terms of question 8.9 overall, ETS supports Option 1 above that the Council should use the indicative areas of search as identified in figure 11.
6.	Yorkshire Water	The area of search appears overly narrow and if adopted will potentially rule out a number of sites that could otherwise be suitable for a waste management facility. The rationale for the areas of search is not entirely clear from the information provided in the consultation document but it appears to be restricted to urban areas which will not necessarily provide the most sustainable (in economic and environmental terms) locations, particularly when looking at future requirements.

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Rep ID	Name / Organisation	Summary of Representation
7.	SITA UK	<p>We agree with Option 1 – agree in general with the areas of search identified on Figure 11 but consider that alternative sites coming forward outside this area should not be ruled out and should be given due consideration. In the longer term, to retain flexibility, alternative sites should be able to be considered under criteria based policies in the final DPDs.</p> <p>The document recognises the current reliance on exporting waste from the region and whilst it is obviously desirable to move towards self-sufficiency, export may remain a better solution for some waste streams if sites close to the regional boundaries provide significant locational or other advantages. Flexibility is key to a good DPD, providing strong guidance yet allowing alternative proposals coming forward to be considered on their individual merits.</p>
8.	Highways Agency	<p>Application of the principle of self-sufficiency in developing waste disposal options within Areas of Search should minimise any adverse impacts on the SNR – indeed, it should eventually take some HGV movements off the SNR. However, any joint initiative with neighbouring Districts in West Yorkshire could have the opposite effect resulting in use of the M606 access any selected sites in the south of the District unless mitigation measures can be devised.</p>

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Rep ID	Name / Organisation	Summary of Representation
9.	ARUP on behalf of Aire Valley Environmental	<p>It is our view that the Area of Search as defined is not sufficiently robust to be used as a determining factor for the location of future waste management facilities. It does not recognise the difference in scale of different types of waste management facility and their specific locational needs.</p> <p>If rigidly applied, the Area of Search would also restrict sites coming forward for waste related development, which may be considered appropriate if the site selection criteria outlined in Planning Policy Statement 10: Planning for Sustainable Waste Management are applied.</p> <p>It is therefore considered that the Council should not identify an Area of Search in the Core Strategy and rely on criteria policy only (Option 3).</p>
10.	Waste Recycling Group	<p>3) Do not identify area of search in the Core Strategy and only reply on criteria policy only</p> <p>We believe that the Area of Search is relevant as an indicative guide to development of waste management facilities rather than a definitive placement. We would suggest that the framework allows for sites to be assessed on their merit both within and without the indicative areas.</p>
11.	WDA	<p>It follows [from Q.8.8] therefore that the WDA would favour Option 2 in 8.9.</p> <p>A more balanced approach could allow consideration of waste development in the green areas as well as white areas as shown in figure 11, otherwise the approach adopted in figure 11 is supported. Clearly a specific site selection criteria may be needed for consideration of any proposed development in the green areas of figure 11 to be permitted.</p>

Question 8.9: Do you agree with the indicative Area of Search for waste or not?

- Option 1: Use Areas of Search as identified using alternative criteria (see question 8.10 below)
- Option 2: Use a different area of search
- Option 3: Do not identify area of search in the Core Strategy and only reply on criteria policy only

Rep ID	Name / Organisation	Summary of Representation
13.	Natural England	<p>Natural England broadly agrees with the indicative areas of search selected, including the environmentally sensitive areas across the district (Option 1). However, we would add Local Nature Reserves to the list as they are likely to be of significant public amenity.</p> <p>We would also urge use of Bradford's Landscape Character Assessment SPD to determine additional sensitive locations (for instance, areas of strong landscape sensitivity) which may not be suitable for most waste sites (though some types of waste sites, e.g. composting facilities in redundant agricultural buildings, may be acceptable).</p>

Question 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

Rep ID	Name / Organisation	Summary of Representation
1.	Yorkshire Wildlife Trust	<p>Option 2: Remove environmentally sensitive areas. The Trust would support this option. Waste management and landfill areas within environmentally sensitive areas have potential to damage such areas. The Trust would like to see Local Nature Reserves included as environmentally sensitive areas.</p>

Question 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		
Rep ID	Name / Organisation	Summary of Representation
3	English Heritage	<p>In terms of the historic environment, at a strategic level, we would endorse the inclusion of the three assets which are depicted on Figure 9 as a means of identifying broad locations for waste management facilities. However, it should be borne in mind that there is a requirement within national policy guidance to also have regard to the impact which development might have upon the “setting” of these assets. As PPG15 makes clear, this can include land at some distance from the designated area and is not simply limited to land “adjacent” to the asset itself (as implied on Page 19 of the Report).</p> <p>In refining the areas of search, the strategy would need to have regard to the potential impact such development might have upon:-</p> <ul style="list-style-type: none"> - Scheduled Monuments and other nationally-important archaeological remains (where there is a presumption, in national policy guidance, in favour of the physical preservation in situ of such sites and their setting), - Listed Buildings (where there is, again, a presumption in favour of the preservation of their special character and setting), - Conservation Areas, and - The character and landscape setting of the District’s historic settlements.

Question 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		
Rep ID	Name / Organisation	Summary of Representation
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)	<p>It is considered that the broad search criteria adopted by the Council are appropriate in terms of identifying the most suitable areas within Bradford for waste management development. The proximity of municipal and commercial waste management sites to urban areas is considered to be particularly importance since facilities should ideally be located as close to waste arisings as possible, in order to minimise the waste miles travelled. Similarly, the requirement for sites to be located close to the strategic highway network is a key consideration, in order to minimise the impact of waste related traffic on the environment and local community. Support is also given to the use of ‘environmentally sensitive areas’ criteria.</p> <p>ETS support Option 3 above, that the Council should keep the search criteria layers as they are.</p>
6.	Yorkshire Water	<p>As outlined above, we do not consider the reasons for the broad search criteria are sufficiently robust. In particular, we question the reasons for including Green Belt as an “Environmentally Sensitive Area” which does not fit with the criteria laid out in PPS2 for the purposes of Green Belt designation. We have waste water treatment works situated within the Green Belt and it is essential that they are operated effectively and able to comply with any new legislation, which may require the construction of new plant or buildings within existing sites.</p> <p>Given the extent of Green Belt within the Bradford District, excluding potential waste management sites within it at this early stage of the planning process could rule out sites where, to quote the Companion Guide to PPS10, “very special circumstances exist that clearly outweigh the harm caused by the proposed site being developed in the Green Belt....” We suggest that Green Belt is removed as an “Environmentally Sensitive Area” but a note is made in the document that an applicant would have to demonstrate that very special circumstances exist at a particular site.</p>

Question 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

Rep ID	Name / Organisation	Summary of Representation
7.	SITA UK	We agree with Option 3 – to keep the layers as they are, although it should be clarified within the text whether the second filter looks to prioritise site within 1km of the <i>strategic</i> road network or simply the existing road network. Presumably the former was what was meant.

Question 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

Rep ID	Name / Organisation	Summary of Representation
9.	ARUP on behalf of Aire Valley Environmental	<p>We have concerns about the broad search criteria used to define the Area of Search. We consider there are inaccuracies and insufficient information to define an appropriately robust and sophisticated area of search for inclusion in the LDF.</p> <p>We note that the West Yorkshire Green Belt has been included within the 'Environmentally Sensitive Areas' layer. This is inappropriate and misleading, because Green Belt is a land use policy designation not an environmental designation.</p> <p>The five purposes of Green Belt as described in PPG2: Green Belts, are to: check the unrestricted sprawl of large built up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration by encouraging the recycling of derelict and other urban land. These purposes do not relate to environmental sensitivity.</p> <p>In addition, Paragraph 8.17 of the Companion Guide to PPS10: Planning for Sustainable Waste Management is clear that criteria based policies in Local Development Documents need not impose a total blanket ban on the establishment of waste management sites in Green Belts.</p> <p>Green Belt should not be included in the same layer as the statutory and non statutory environmental designations and indeed we question whether the Green Belt should feature as a layer in its own right either, in light of the guidance offered by PPS10. In summary, we cannot support any of the options in relation to question 8.10 as they are currently worded. However, in principle we support the identification of statutory and non statutory environmental designations (excluding Green Belt) and the identification of the existing road network and urban areas, as information which may be useful in guiding decision making, but not as absolute decision making factors in their own right.</p>

Question 8.10: Are the broad search criteria adopted in this paper appropriate?		
<p>- Option 1: Remove existing road network and urban areas</p> <p>- Option 2: Remove environmentally sensitive areas</p> <p>- Option 3: Keep layers as they are</p>		
Rep ID	Name / Organisation	Summary of Representation
10.	Waste Recycling Group	3) Keep layers as they are.
11.	WDA	A potential Option 2 to include the green area in figure 11 subject to specific (and as yet undefined) site selection criteria is preferred.
13.	Natural England	Natural England would agree with Option 3 : to keep layers as they are, but would add the additional constraints mentioned in 8.9 above.

Question 8.11: Are there any broad criteria that should be on the plan that are not, if so what?		
Rep ID	Name / Organisation	Summary of Representation
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)	<p>In general, it is not considered that the council should adopt any additional criteria in order to further define the indicative areas of search of waste management facilities. Any additional criteria used may constrain the site search unduly and make the process overly complex.</p> <p>However, it is considered that some weight should be given to the potential to develop a major strategic facility within the south east of the administrative boundary, proximate to the urban area of Bradford, for reasons of sustainability (i.e. where the majority of the Districts population is concentrated and predominantly where the waste will arise.)</p> <p>It is also considered that, within the broad areas of search identifies on Figure 11, priority should be given to:-</p> <ul style="list-style-type: none"> - The development of existing waste management facilities; and - utilising previously developed industrial sites.

Question 8.11: Are there any broad criteria that should be on the plan that are not, if so what?		
Rep ID	Name / Organisation	Summary of Representation
6.	Yorkshire Water	PPS10 and RSS policy make it clear what search criteria should be utilised in identifying appropriate locations for waste management facilities. It would be helpful if the Potential Area of Search better reflected these criteria, for example identifying areas where complementary activities already take place and areas of previously developed land which might be suitable for re-use. It would also be useful to show the current distribution and pattern of waste management facilities within the district (including WWTW).
7.	SITA UK	There are many filter criteria which could be used but we agree with these as broad criteria.
9.	ARUP on behalf of Aire Valley Environmental	<p>It is our view that PPS10 and its associated companion guide provide a very clear steer on the criteria that should be considered in determining appropriate locations for waste management facilities, many of which have not been reflected in the Area of Search.</p> <p>To enhance the sophistication of the Area of Search, Bradford MDC could consider the following:</p> <ul style="list-style-type: none"> – Rather than just identifying urban areas, seek to understand the location and distribution of potential complementary land uses to waste management facilities, such as general industrial estates, waste water treatment works and redundant agricultural buildings. – Understand the location of potentially sensitive receptors, such as schools, air quality management zones and statutory wildlife sites. – Understand the current distribution of waste management facilities across the district and take a view as to the ability to accommodate further facilities in such locations. – Understand the distribution of previously developed land both within and outside urban areas across the district. – Understand that the district may need to accommodate waste management facilities that range significantly in scale and size, so identify broad locations that can accept, large, medium and small scale facilities (and define the size parameters of each).

Question 8.11: Are there any broad criteria that should be on the plan that are not, if so what?		
Rep ID	Name / Organisation	Summary of Representation
10.	Waste Recycling Group	No further broad criteria considered.
11.	WDA	No further comments on 8.11.
13.	Natural England	See answer to 8.9 above.

Question 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?		
Rep ID	Name / Organisation	Summary of Representation
1.	Yorkshire Wildlife Trust	It is very important that there is no overall assumption within the plan that quarries and other brownfield sites should be automatically suitable for developing waste facilities. Such sites, particularly if they have been left and allowed to regenerate naturally, may have very high biodiversity and value for nature. Each site should be evaluated individually including evaluating for its invertebrates populations, which are often of regional importance.
3	English Heritage	The Indicative Areas of Search should be the preferred location (subject to a detailed site specific impact assessment) for waste management facilities. However, it may well be possible to locate such facilities within the defined Environmentally Sensitive Areas where it can be demonstrated that there are no suitable site within the Preferred Areas and that it the proposed development will not have an adverse impact upon the environmental assets of the area or the amenities of the District's communities.
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure	In general, it is considered that exceptions to the indicative areas of search should not be made, given that the sites are not likely to be in close proximity to the urban areas or to the strategic highway network, which ETS considers (in agreement with the consultation documents) to be important considerations to be taken into account when identifying the most suitable sites for waste management development.

Question 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?

Rep ID	Name / Organisation	Summary of Representation
	Development UK LTD (Skanska)	It is recognised however that this approach may be too rigid and there may be certain circumstances where it is appropriate to allow exceptions. In such cases, it should be necessary to demonstrate that the site outside the indicative areas of search is at least as good as sites within the indicative search areas and meets certain criteria (e.g. it is not within an environmentally sensitive areas and it is close to the strategic highway network).
6.	Yorkshire Water	There are existing waste management/complementary activities already located within Green Belt or other sensitive areas. If the current broad areas of search are retained in the Core Strategy, then these sites should logically be considered as exceptions. Not to do so could conflict with PPS 10 policy guidance.
7.	SITA UK	As answered to Q8.9 above, any sites coming forward outside the area of search should be given due consideration and the broad search criteria will be some of the aspects against which they will be considered.
9.	ARUP on behalf of Aire Valley Environmental	<p>We consider that there should definitely be exceptions to the indicative areas of search shown on figure 11 for the following reasons:</p> <ul style="list-style-type: none"> - As demonstrated in this response, the criteria currently used to define the Area of Search are not robust and will constrain consideration of sites which would otherwise meet the requirements of PPS10. - Sites within the Green Belt or open countryside are not necessarily inappropriate for waste management uses, especially if they are related to a complementary use, bring previously developed or under used land back into active use and are accessible. - We consider existing waste water treatment work sites should be considered as complementary uses to potential waste management facilities.

Question 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?		
Rep ID	Name / Organisation	Summary of Representation
10.	Waste Recycling Group	Yes, as per our response to question 8.9 we believe that each site should be assessed on its own merits. Locating complimentary activities together is supported in national and regional guidance including PPS 1 and should be considered. In addition the support of appropriate rural development to should be encouraged to aid economic growth within these regions.
11.	WDA	WDA believes 8.12 is a possible start of specific site selection criteria as mentioned in our response to 8.10 above. This could also include any other areas of degraded land within a greenbelt setting arising from a previous industrial activity, mineral extraction, water/wastewater treatment etc that lie in green belt yet within 1km of the strategic road network. The case for the reason why has already been made above, but in particular to achieve a more balanced approach, and does not constrain potential new waste facility development.
13.	Natural England	There may be exceptions to the indicative areas of search shown in Figure 11 as different waste treatments have different levels of impacts in different locations. In particular, redundant agricultural buildings may be able to accommodate composting facilities and such buildings may, in some circumstances, be the most sustainable locations. Such exemptions should only be permitted if environmental and social impacts can be mitigated for, so it may be advantageous to include criteria based policy to cover such exceptions.

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?

- Option 1: 1km as it is
- Option 2: Another variable (suggest)
- Option 3: 1km used less strictly as a preference rather than a constraint

Rep ID	Name / Organisation	Summary of Representation
1.	Yorkshire Wildlife Trust	Option 3: 1km used less strictly as a general preferred distance. The distance from urban centers may be a more important constraint in reducing vehicle movements than 1km from the road network. Also sites which are less environmentally sensitive and damaging to biodiversity might be excluded on this ground.
3	English Heritage	Given the Council's stated intention that the LDF, as a whole, should deliver sustainable development, the waste strategy should explore the possibility of using the rail network to move waste around the District rather than simply assuming that it will all be transported by road.
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)	ETS considers that the proximity of the site to the strategic highway network is a key consideration, given that (as highlighted in the Sustainability Appraisal pn page 18) the limitations on transporting waste by water and rail means that it is difficult to transport inputs and outputs to/from waste management facilities by other modes than road transport. There is a need therefore to ensure that sites are located as close to the strategic highway network as possible, in order to reduce as far as practicable the impacts from waste related traffic on local communities and the environment. ETS therefore supports Option one above.
6.	Yorkshire Water	Option 3 would provide the most flexibility particularly with regard to future waste management requirements.
7.	SITA UK	We agree with Option 3 – to use the 1km less strictly as a general preferred distance. There is no good reason to rule out a site simply because it is 100m further from the strategic road network – related impacts will depend very much upon the characteristics of the intervening road and land.

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?		
<p>- Option 1: 1km as it is</p> <p>- Option 2: Another variable (suggest)</p> <p>- Option 3: 1km used less strictly as a preference rather than a constraint</p>		
Rep ID	Name / Organisation	Summary of Representation
9.	ARUP on behalf of Aire Valley Environmental	<p>Whilst access to the strategic network is an important criteria for the movement of waste arising across the district, we consider that rigid application of this criteria may exclude sites worthy of consideration. For example, some sites may have an access point within the 1km criteria which lead into the site, but the site itself might be beyond this 1km limit. In addition, it is important that sites which are well located to areas of likely population, housing and employment growth are not excluded from consideration by the 1km criteria.</p> <p>In summary we therefore support Option 3, 1km used less strictly as a generally preferred distance to enable flexibility.</p>
10.	Waste Recycling Group	<p>1) 1km as it is</p> <p>In general we broadly agree with the 1km preference where the development relates to high traffic facilities, although further detail is needed to allow an understanding of how the “strategic” network has been defined.</p>
11.	WDA	In 8.13 the WDA believe 1 km either side of major/primary/strategic road network as identified in figure 11 is supported.
13.	Natural England	Natural England would agree with the sustainability appraisal that a distance threshold from the strategic road network should be stated to minimise the need for upgrading minor roads. However, we would like to see more emphasis on locating waste facilities close to access points to the rail and/or canal network in order to ensure the sustainability of transporting waste is maximised.

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RESPONSE TO CALL FOR SITES (WASTE)			
Rep No.	Consultee	Site	Location
2.	ENCIA Environmental LTD on behalf of Bio-Gen Power Limited	Ripley Road	West Bowling, Bradford
6.	Yorkshire Water	Esholt Sewage Treatment Works	Esholt, Bradford
9.	ARUP on behalf of Aire Valley Environmental	Esholt Sewage Treatment Works	Esholt, Bradford
11.	WDA	Bowling Back Lane Waste Transfer Station and Household Waste Recycling Centre	Bradford
		Royd Way Waste Transfer Station and Household Waste Recycling Centre	Keighley
		Wilson Road Household Waste Recycling Centre (HWRC)	Deal Burn Road, Low Moor, Bradford
		Ford Hill HWRC	Hill End Lane, Queensbury, Bradford
		Sugden End HWRC	Halifax Road, Cross Roads, Keighley
		Ilkley HWRC	Golden Butts Road, Ilkley
		Dowley Gap HWRC	Wagon Lane, Bingley
		Midland Road HWRC	Midland Road, Manningham, Bradford

4.0. SCHEDULE OF WRITTEN REPRESENTATIONS TO THE INITIAL SUSTAINABILITY APPRAISAL DOCUMENT

Rep ID	Name / Organisation	Summary of Representations to Waste Management Initial Sustainability Appraisal
3.	English Heritage	<p>Page 12, Table 2</p> <p>In the majority of Sustainability Appraisals, the Plan’s Options are tested against each of the SEA Objectives. This enables one to ascertain which aspects of the environment are likely to experience adverse effects and which positive effects. This also enables the Plan maker to consider whether there are any potential mitigation measures which might lessen the severity of harm identified.</p> <p>The approach undertaken in this Table (which makes a generalised assessment of the effects across the whole raft of SA Objectives) makes it impossible to ascertain whether the score is likely to be correct. Consequently, there may be questions raised about whether or not the strategy is actually identifying the likely significant effects upon the environment of pursuing the adopted strategy (as it is required to do by the SEA Directive).</p> <hr/> <p>Page 21: Draft Sustainability Appraisal Objectives</p> <p>In response to the last consultation on the Sustainability Appraisal of the Core Strategy, we expressed our reservations about the way in which it was proposed to frame a Sustainability Appraisal Objective for the historic environment. We are concerned, therefore, that despite our comments, it is still proposed to use what appears to be the same SA Objective for the historic environment.</p> <p>The SEA Directive requires SEAs to consider the likely significant effects of the plan upon “cultural heritage including architectural and archaeological heritage”.</p> <p>As currently proposed, one would presume that the majority of the historic environment would fall within the “Land Use”</p>

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Rep ID	Name / Organisation	Summary of Representations to Waste Management Initial Sustainability Appraisal
		<p>Objective. However, the second topic under the “Natural Assets” Objective which deals with man-made landscapes could, potentially, include Historic Parks and Gardens. It would be more logical if all the historic assets were dealt with under the one Objective. This would leave the “Natural Assets” Objective simply covering wildlife, habitats and landscapes (although it would be preferable to simply refer to “landscapes” which would overcome the issue of whether one can refer to “man-made assets” as being “natural”).</p> <p>However, even if all the historic assets are grouped together, we have reservations about incorporating the historic environment under the “Land Use” Objective. This is a composite Objective containing three distinct elements - design quality; the historic environment; and the efficient use of land. Whilst there is undoubtedly a link between the first two elements, the connection between the historic environment and making better use of land is somewhat tenuous. It would be quite possible, therefore, to achieve a positive outcome for one aspect of this SA Objective yet, at the same time, have an adverse impact upon another. For example, the Council might embark upon a strategy which sought to increase the heights of buildings and a commitment to higher densities within the City centre. Whilst such a strategy would undoubtedly score highly against the “making more efficient use of land” Objective, it could, potentially, have an adverse effect upon the character of the District’s Conservation Areas or the setting of its Listed Buildings. In scoring this strategy, a positive score for “the efficient use of land and buildings” Objective would be cancelled out by a negative score for the “protecting and enhancing the historic environment” Objective. Thus, rather than being able to clearly identify likely effects of such a strategy, it is more likely simply to result in an “uncertain” scores in the assessment.</p> <p>Consequently, we consider that there should be a separate SA Objective relating to the historic environment (in a similar manner to that proposed for biodiversity). This approach has been adopted in the vast majority of SAs/SEAs which have been produced around the Region and is one where it can be clearly demonstrated that the Assessment has met the Directive’s requirements insofar as considering the likely significant effects of the plan upon “cultural heritage including architectural and archaeological heritage”.</p>

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Rep ID	Name / Organisation	Summary of Representations to Waste Management Initial Sustainability Appraisal
		We would suggest an Objective along the lines “Protect and enhance the historic assets”.
4.	Scott Wilson on behalf of Earth Tech Engineering (Earth Tech) and Skanska Infrastructure Development UK LTD (Skanska)	<p>Comment made under Question 8.8</p> <p>While the Interim Sustainability Appraisal on the Core Strategy Waste Management DPD: Further issues and Options states (on page six) that “existing waste sites may or may not be located in the most suitable locations”, both the sites highlighted above are within the indicative areas of search shown on Figure 11 by virtue of the fact that they are:</p> <ul style="list-style-type: none"> – Not within an environmentally sensitive area – Within 1km of the strategic highway network; and – In close proximity to urban areas <p>In addition, the sites are within two of the three areas (namely the City Of Bradford and Keighley) which are identified within the Core Strategy Issues and Options papers as areas for future growth and development across Bradford.</p> <p>Comment made under Question 8.9</p> <p>The broad criteria adopted by the Council in order to define the indicative areas of search (as shown in Figure 11) are considered appropriate. Furthermore, the comments made in the interim Sustainability Appraisal (on page seven) that the use of indicative areas of search provides transparency and gives developers knowledge in advance of where development is/is not likely to be acceptable are supported.</p> <p>Comment made under Question 8.10</p> <p>The comments made in the Interim Sustainability Appraisal (on page nine) that the use of the broad search criteria provides a more tailored approach without being too complex are supported.</p>
8.	Highways Agency	<p>The Agency supports the additional Sustainability criteria that could be applied for potential waste management, and, in particular, the criterion that “<i>sites should be in the right locations to serve current and future population thereby reducing distances travelled to treatment sites, minimising nuisance caused by waste transport and confining it to suitable roads</i>”.</p> <p>The Agency has no substantive comments on the Appraisal other than a need to be able to provide an input when options are being worked up. The Agency supports the principles contained in SA8 in terms of its impact in minimising</p>

Local Development Framework for Bradford

Rep ID	Name / Organisation	Summary of Representations to Waste Management Initial Sustainability Appraisal
		the need to move all forms of waste out of Bradford for disposal in order to minimise impact on the SNR.
13.	Natural England	Natural England welcomes the Interim Sustainability Appraisal and agree with the assessment made in Table 2: Summary of Sustainability Appraisal. We would, however, note that the coverage of key question 8.10 in the table on page 15 seems to focus entirely on the negative impacts of locating in urban areas, when clearly there are environmentally sensitive areas in rural locations too. Further to this, it is not clear whether urban areas are considered a constraint in themselves in the Further Issues and Options report. The RSS's emphasis on utilising established industrial sites may in practice mean that some urban locations should be considered in areas of search.

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