Bradford Local Plan

Core Strategy Examination

Matter: 7F Waste Management Policies WM1 & WM2

Further Statement on Waste Management Policies WM1 and WM2 in relation to proposed revisions to text

Date: 13th March 2015

Venue: Victoria Hall, Saltaire

Introduction

1.1 This statement sets out the proposed revised text in relation to Matter 7F Waste Management following the examination on day seven, in which discussion took place regarding the insertion of text/tables to clearly demonstrate the approach set out in polices WM1 and WM2.

1.2 The figures within the tables are based on the Bradford Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014) (PS/B001b/31 and PS/B001b/32). However we are aware that the 2013 figures are now available and we intend to scrutinise and run the model with 2013 data, inserting updated tables before adoption of the Core Strategy through a minor modification.

1.3 The statement provides the proposed whole section in totality, including the modifications to policies already subject of proposed minor modifications (PS/B004) which are also noted in the statement on matters issue for matter 7F.

1.4 The additional text is underscored and the deleted text struck through.

Proposed Revised Core Strategy Text and Policies

INTRODUCTION

5.6.1 Waste is often seen as a by-product of living, to be disposed of by the cheapest possible method. Bradford has traditionally been reliant upon sending waste to landfill sites outside the District and there is limited waste management infrastructure within the Bradford District to deal with certain types of waste, in particular Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C&I) by any other means.

5.6.2 However, the policy direction for waste management has changed over the years. The European Waste Framework Directive~~s~~ 2008 requires appropriate measures to prevent or reduce waste production and its harmfulness and to promote the recovery of waste by means of recycling, re-use or reclamation or any other process with a view to extracting secondary raw materials, or the use of waste as a source of energy.

5.6.3 This European guidance is subsequently delegated to a national level through the Waste (England and Wales) Regulations 2011, National Planning Policy for Waste (NPPW) Oct 2014 and the Waste Management Plan for England Dec 2013, which set out how England will meet the requirements of the European directives on waste and deliver a shift towards a more sustainable management of waste at a local level.

5.6.4 In an effort to achieve greater sustainability and net self-sufficiency in managing waste within Bradford, the ~~current~~ approach to waste management needs to improve and change further. It is essential that greater emphasis is placed on avoiding waste production and managing waste produced in the most sustainable way, making use of waste as a resource and only disposing of the residue that has no value.

5.6.5 The policies of the Core Strategy will encourage the promotion of the sustainable management of waste and recycling within the district in line with national guidance.

5.6.6 In particular the policies seek to minimise the negative effects of the generation and management of waste on human health and the environment. This reflects the need to reduce the use of natural resources, and favour the practical application of the waste hierarchy and promoting waste as resource.

5.6.7 Policy WM1 creates a strategic planning framework to minimise the negative effects of the generation and management of waste on human health and the environment. It further states that waste policy should encourage a reduced use of natural resources, and favours the practical application of the waste hierarchy. One of the primary mechanisms of achieving the aspirations of the waste hierarchy is the delivery of an adequate range of waste management facilities to ensure waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District. A range of new facilities shall be needed to deal with tonnages of Commercial and Industrial (C&I) and Local Authority Collected Waste (LACW) and this will be facilitated through the Waste Management Development Plan Document which will identify locations which are considered suitable for the development of new waste management infrastructure

5.6.8 Policies WM1 and WM2 seek to support the delivery of new waste management facilities, which aid in the movement of waste up the hierarchy, are considered critical infrastructure and support sustainable growth and sustainable communities, in line with Core Strategy Objectives 3 and 16.

EVIDENCE

5.6.9 Information relating to the specific details of this evidence base can be found within the Waste Management DPD and the supporting Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014).

WASTE ARISINGS - CURRENT POSITION

5.6.10 The future scale of waste arisings and the waste management facilities which need to be planned for in Bradford District is critical. This section considers the need for new waste management facilities.

5.6.11 Analysis is based on the Council's Waste Data Forecasting Model. For a full explanation of the methodology and sources used to calculate waste arisings and forecasts please refer to Bradford Waste Needs Assessment, Capacity Gap Analysis and Requirement Study.

5.6.12 The majority of current waste arisings within Bradford District come from Commercial and Industrial Waste (C&I), Construction, Demolition and Excavation Waste (CDEW) and Local Authority Collected Waste (LACW) which combined equate to just under ¾ of the total arisings. Agricultural waste has increased significantly from previous figures, mainly due to the new legislation coming into force in 2010. Table 1 sets out the current waste arisings for Bradford.

Table 1: Summary Total Waste Arisings in Bradford (2012)

Type of Waste Arising	Arisings (Tonnes)	%
Agricultural Waste	283,132	20.20
Commercial Waste	254,314	18.20
Industrial Waste	219,773	15.71
Construction Demolition and Excavation Waste	350,000	25.02
Hazardous Waste	19,155	1.37
Local Authority (Including Calderdale Residual)	272, 668	19.50
Total* **	**1,399,042**	100
Waste Water**	1,024,568	

Source: Environment Agency Waste Data Interrogator (WDI) 2012.*
*Yorkshire Water 2014**.*
*Total Being Planned for in the Waste Management DPD through either planning policy or site allocations or a combination of both****

5.6.13 The projected forecast waste arisings for Bradford District draws on the most reliable and robust data available for each waste stream. The Council are taking forward a 'Growth' based scenario, which follows a growth rate of 33% estimated Gross Value Added (GVA) for all the waste streams of Commercial, Industrial, CDEW and Hazardous. A separate growth rate has been applied to Local Authority Collected Waste to ensure alignment with the Municipal Waste Strategy, and zero static growth rate applied to Agricultural waste.

Table 2: Forecast Waste Arisings in Bradford (2013–30) using Bradford Waste Forecasting Model

Waste Stream	2013	2018	2022	2026	2030
Agricultural Waste*	283,133	283,133	283,133	283,133	283,133
Commercial and Industrial Waste*	634,586	662,933	686,658	711,357	737,082
CDEW*	447,604	455,709	472,360	483,800	495,515
Hazardous Waste*	19,153	19,764	20,267	20,782	21,311
Local Authority Collected Waste**	306,148	338,736	358,179	369,852	381,188
Total Tonnes	**1,690,907**	**1,760,275**	**1,820,597**	**1,868,924**	**1,918,229**

*Source: *Bradford Council Waste Data Forecasting Model, **Bradford Council Waste Strategy Team*

5.6.14 While these levels should be planned for in terms of the provision of expanded and new facilities, the Waste Management DPD policies will also ensure that opportunities to reduce, re-use and recycle waste will be maximised and that some flexibility and contingency in the levels of future waste management facilities provision will be made on a, monitor and manage basis.

CROSS-BOUNDARY WORKING

5.6.15 The Local Plan must give consideration to cross-boundary issues when setting spatial policy and waste management allocations.

5.6.16 Bradford Council will continue to work collaboratively with neighbouring local authorities and other local authorities where waste import / export relationships exist now and are recognised to likely continue in to the future recognising the importance of the duty to cooperate in achieving net self sufficiency for Bradford. This will ensure a collaborative cross-boundary approach to waste management is established and maintained. In addition to the continued active participation in the Yorkshire and Humber Waste Technical Advisory Body, the Council will:

- Share with neighbouring authorities and statutory bodies all relevant information, data and its analysis relating to current and future waste arisings across all waste streams, technologies and performance in reducing, re-using, recycling and disposing of waste;
- Work collaboratively on emerging Local Plans and their future updates where appropriate and practical;
- Provide comment on waste related planning applications where appropriate to do so;
- Support the commissioning of joint monitoring reviews, data updates and specific waste related studies to support regional and sub-regional waste management and future policy development where appropriate and practical.
- Attend and contribute to any groups, bodies or meetings to support cross boundary working on waste.

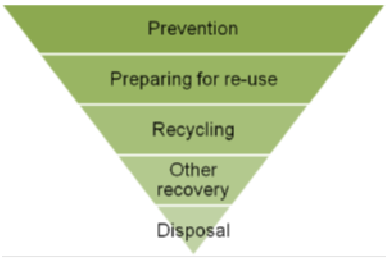
POLICY

5.6.17 There is a need to consider how waste management policy developed within the Local Plan can deliver against the Core Strategy objectives and those within the Waste Management DPD. This includes the extent to which it is suitable to apply a waste management hierarchy within future policy.

5.6.18 Policies WM1 and WM2 establish the strategic framework and spatial direction for managing waste in the Bradford District. The strategy will be implemented through more detailed policies and related documents as set out in the Waste Management DPD, which also shows specifically how sufficient capacity has been identified and assessed to meet the waste forecasts.

WM1: Waste Management

A.The Council will work with its partners and neighbouring authorities to integrate strategies for waste management in Bradford and at the sub-regional and regional levels. All forms of waste will be managed in accordance with the principles of the waste management hierarchy:



B. The Council will plan for the most sustainable and environmentally effective management of–forecast waste arisings of all types of waste, reducing the reliance on other authority areas. In identifying waste management sites within the District the Council will give regard to cross boundary issues, including waste movement and location of facilities in adjacent areas; working collaboratively with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management and allow the District to become net self-sufficient.

5.6.19 The Council's primary delivery mechanism for Policy WM1 will be the allocation of land for an adequate range of waste management facilities through the Waste Management DPD. This should be provided to ensure that waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the economic, social and environmental needs of the District.

5.6.20 The Waste Management DPD will also put forward a number of planning policies to support the delivery of allocated and unallocated waste management sites, and safe guard any existing waste management infrastructure vital to the delivery the waste hierarchy.

5.6.21 The Municipal Waste Strategy (and subsequent updates) will also dictate how the Council will directly contribute towards moving waste up the hierarchy through future waste operations.

IDENTIFYING WASTE MANAGEMENT SITES

5.6.22 European and national policy relating to forward planning for waste management requires Waste Planning Authorities to consider the most appropriate locations for waste facilities in the future. This should include the relationship of the site with the waste arisings, minimising the movement of waste, and also the consideration of the potential impact of waste management facilities on their surrounding environs.3.7 Consideration is given to the need to identify sites for the principal waste streams

- **LACW** – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management facilities.

- **Commercial and Industrial** – sites will be identified for this waste stream, as the evidence base demonstrates a shortfall in a range of waste management facilities.

- **CDEW** - there are number of existing sites transferring and managing this waste stream. On site recycling upon demolition and development will be encouraged to move management of this waste up the hierarchy. Sites will not be specifically identified for this waste stream.

- **Agricultural** – the majority of this waste stream will be managed within farm holdings, small amounts of 'specialised' agricultural waste can be managed at C&I facilities. Future waste arisings are identified in the evidence base as being very small, therefore this stream will continue on farm holdings, existing sites and identified C&I sites.

- **Hazardous & Low Level Radioactive waste** – Both these waste streams generate very low levels of waste arisings. Such low levels do not quantify the allocation of further sites specifically for the management of these waste types, the economies of scale are such that the provision of sites within the Plan area for the very small quantities of arising's would be unlikely to be viable.

- **Residual Waste for Final Disposal (i.e. Landfill)** - the existing sub-regional and regional capacity does not quantify the allocation of a site for a new landfill for the disposal of residual waste following treatment[1].

5.6.23 Bradford Council will only be seeking to allocate Waste Management Facilities for the treatment of Local Authority Collected Waste (LACW) and Commercial and Industrial Waste. This strategic approach is based on the following factors:

- LACW and C&I are consider priority waste streams;
- Need to reduce biodegradable waste not being managed;
- Sites will be large scale and of strategic importance;
- Waste arisings are of a sufficient scale to allow the delivery of viability facilities;
- Other waste streams are capable of being managed 'on-site';
- Treating other waste streams at facilities with the sub-region / region is the most sustainable and environmentally effective approach.

5.6.24 Through the Waste Needs Assessment, Capacity Gap Analysis and Requirement Study (2014), it has been identified that there is a capacity gap in the waste management facilities based on the current and future waste arisings .

5.6.25 Table 3 establishes the current capacity gap, within the Bradford District applying the Growth Scenario with maximised recycling based on the Waste Needs Assessment Capacity Gap Analysis and Requirement Study (2014). This existing capacity gap will be reviewed and updated (if necessary) through the Waste Management DPD. The Waste Management DPD will also assess the future capacity gap for the plan period, ensuring the sufficient allocation of appropriate sites over the plan period.

[1] Memorandum of Understanding/Minutes/Agreements – Yorkshire and Humber Waste Technical Advisory Body

Table 3 – Existing Waste Management Capacity Gap (tonnes)

Waste Management	Existing Capacity Gap (Tonnes)
Landfill (non-hazardous)	59,439
Landfill (hazardous)	74
Landfill (CD&E)	201,200
Energy recovery (LACW & C&I)	203,169
Incineration (Specialist High Temp)	833
Recycling (C&I and LACW)	400,084
Recycling (aggregates CD&E)	112,975
Recycling (specialist materials– including metal recycling, End of Life Vehicles and WEEE	-1,059
Composting	34,340
Residual Mechanical Treatment	109,146
Treatment Plant (including Anaerobic Digestion, specialised treatment of biodegradable liquids and wastes, organic waste treatment by distillation)	-52,376

5.6.26 Policy WM2 establishes the principles of identifying appropriate locations for waste management facilities, establishing a strategic framework for the Waste Management DPD to allocate enough land for recycling and treatment to take place, to ensure that less waste goes to landfill.

Policy WM2: Waste Management

A. Sites for waste management facilities will be identified to deal with all Local Authority Collected Waste (LACW) and Commercial & Industrial Waste (C&I) arisings within Bradford District. Sites will need to best meet environmental, economic and social needs.

B. In identifying and selecting sites for the management of waste, an Area of Search (See Appendix 7) is established as the framework for identifying sites for new and expanded waste management facilities. Within the Area of Search, the following order of priority will be adopted:

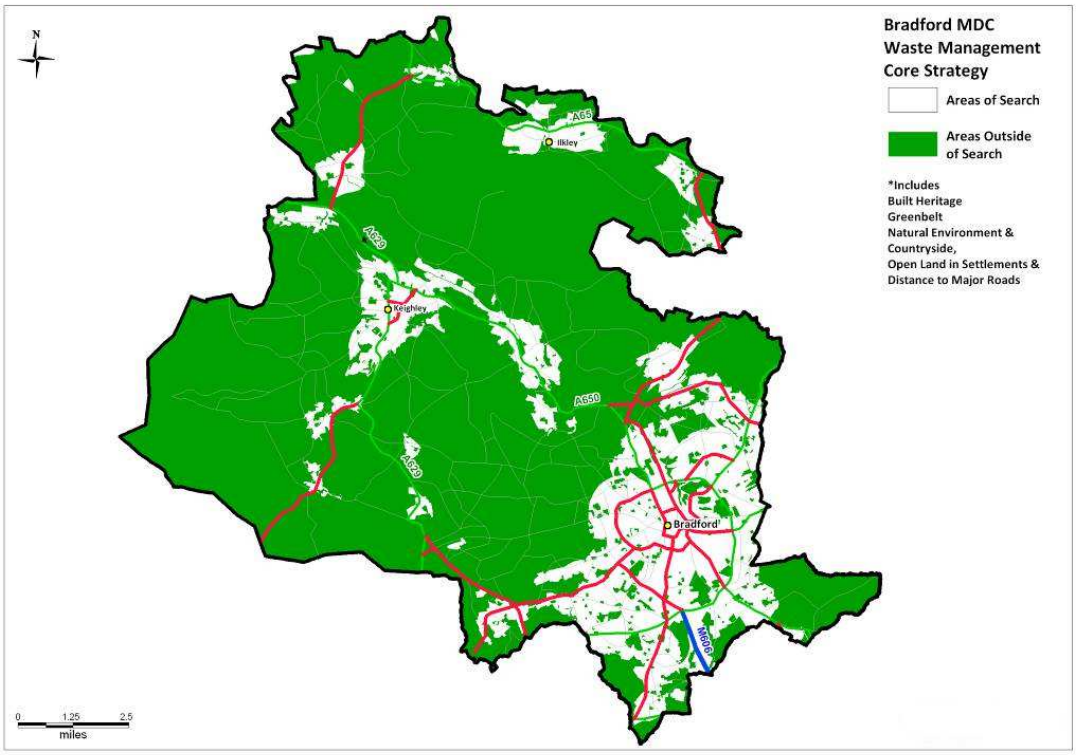
1. The expansion and co-location of waste facilities on existing, operational sites;
2. Established and proposed employment and industrial sites where modern facilities can be appropriately developed;
3. Other previously developed land within the Area of Search, including mineral extraction and landfill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

C. All potential waste management sites will be subject to detailed assessment of their individual characteristics, cumulative impact, economic viability and the impacts of any waste development on surrounding areas. The Waste Management DPD will establish the detailed site development criteria using a similar approach to site identification as applied within the development of strategic and local criteria to include consideration of:

1. Policy alignment;
2. Physical constraints to site development;
3. Proximity to waste arisings;
4. Adjacent uses.

5.6.27 Figure 1 illustrates the Area of Search – including the application of the Green Belt as a constraint (i.e. the Area of Search excluding areas within the Green Belt)

Figure 1 – Identified Area of Search



5.6.28 The Council is of the opinion that taking into account the proximity of facilities to major settlements is a key factor in providing a network of facilities to ensure waste can be disposed of and Local Authority Collected Waste can be recovered in one of the nearest appropriate installations. By limiting the area of search to major settlements within the District, the Council is of the opinion the 'proximity principle' is fully embedded into the policy.

5.6.29 The need to avoid detrimental impacts upon the natural environment and countryside, built heritage, open land within settlements and a proximity to 1km of major roads is also considered to be compliant with the latest national guidance set out in the National Planning Policy for Waste when identifying suitable sites and areas for proposed waste management facilities.

5.6.30 Further information on the site identification and assessment can be found in the Waste Management DPD and the supporting Site Assessment Report.

5.6.31 Policies WM1 and WM2 set in place the principles of identifying appropriate locations for waste management facilities. These principles are key to ensuring much needed waste management infrastructure is delivered in the most sustainable and effective way for the treatment of waste and the avoidance of potential negative impacts.

5.6.32 Policies WM1 and WM2 provide the strategic framework for developing the detailed policies in the Waste Management DPD of the Local Plan to achieve sustainable waste management. It will be consistent with the latest national policy guidance and will make provision for the forecast waste tonnages identified within the supporting Bradford Waste Needs Assessment, Capacity Gap Analysis and Requirement Study. It will set out a detailed planning strategy and will include criteria- based development management policies, as well as identifying sites for new waste management facilities. These will include sites for Local Authority Collected Waste (LACW) and Commercial and Industrial Waste. The Waste Management DPD also puts forward planning policy for the delivery of unallocated sites and the safe guarding of waste infrastructure vital to the delivery of the waste hierarchy.