Bradford Waste Management DPD: Main Modifications

Statement of Consultation

Public Consultation
February 2017 – March 2017

FORWARD

This Statement of Consultation relates to the public consultation that was carried out on the Main Modifications to the Bradford Waste Management DPD: Submission Draft in 2017 and the responses received as a result.

The Main Modifications consultation formed the final round of public consultation on the Waste Management DPD. The consultation sought to involve interested parties and stakeholders and invite representations on the draft modifications to planning policies and development allocations put forward by the council during the examination in public.

This Statement of Consultation provides a link between the representations received and how these have been taken into account and addressed in the DPD.

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LIST OF APPENDICES

1.0 INTRODUCTION & BACKGROUND

1.1 The Planning and Compulsory Purchase Act 2004 brought about a major change to the planning system, in particular to planning policy and how development plans are to be prepared. This means that the adopted Replacement Unitary Development Plan (RUDP) (2005) will, in time, be replaced by the Local Plan (previously Local Development Framework). The Waste Management DPD is being produced as part of the Bradford District Local Plan. When preparing documents which will form part of the Local Plan, the council must carry out public consultation and engage with local communities and stakeholders in order to gauge views on the plan and its soundness. The minimum requirements which all authorities must achieve are set out within the planning regulations.

1.2 Planning Authorities are also required to prepare and publish a Statement of Community Involvement (SCI) which explains when and how any public consultations will take place, who will be consulted and what will be done to engage with the community at each stage of the consultation process and also within planning applications. The council is fully committed to community engagement in the delivery of local services and functions. The SCI for Bradford was adopted by the Council on 8th July 2008.

1.3 This report contains details of the full consultation process carried out for the Bradford Waste Management DPD Modifications, a summary of representations received and how these representations have been taken into account in the preparation of the Waste Management DPD.

1.4 Section 2 of the report sets out the methods of consultation and the programme of events. Section 3 provides a summary of the main issues raised from the consultation responses. Section 4 sets out the next steps for how the Waste Management DPD will progress.

1.5 It is considered that this report provides a fair and accurate representation of comments, however some comments have necessarily been summarised. It should be noted that officers work from both these summaries and from the detailed full comments submitted to move forward to the next stage of the Waste Management DPD. Appendix 3 contains a summary of all representations and Bradford Council's responses to the representations received.

Purpose of this document

1.6 When preparing the local plan, the council must notify key consultation bodies and stakeholders of the subject of the local plan which the council propose to prepare, invite representations about what the local plan ought to contain and take into account any representation made.

1.7 This Statement of Consultation report sets out how the council has involved the community and key stakeholders in the preparation of the Bradford Waste Management DPD. It sets out what was done to consult the different organisations, agencies, and residents of the district, how this met the requirements of the regulations and how it complies with the council's adopted SCI. It also describes how the results of the consultations have been taken into account in preparing the next stage of the plan – Adoption.

Bradford Waste Management DPD

1.8 The Bradford Waste Management DPD is being produced as part of the Bradford District Local Plan. The Local Plan will be made up of a collection of planning documents that will guide future growth and development for the next 15-20 years. The DPD will set out detailed land uses and direct future development and investment.

1.9 There are a number of stages for preparation of the Waste Management DPD; these are highlighted in the list below:

1 Pre-production scoping and evidence gathering (2007-2008)
2 Consultation on Issues and Options (2009 – 2010)
3 Preferred Approach (2011)
4 Preferred Approach – Revised Chapter 5 (2011)
3 Consultation on Publication Draft (2015 / 2016)
6 Submission to Secretary of State (2016)
7 **Examination**
8 Adoption following an Inspectors report.

1.10 The Main Modifications consultation formed the final round of public consultation on the Waste Management DPD. The consultation sought to involve interested parties and stakeholders and invite representations on the key issues and emerging development options put forward by the council. This Statement of Consultation relates to the public consultation that was carried out for the Main Modification to the Waste Management DPD in 2017 and the responses received as a result.

2.0 METHODS OF CONSULTATION & EVENTS PROGRAMME

2.0.1 The Waste Management DPD presented a final draft plan with policies and proposed allocation sites for public consultation. It was the intention of the council to seek the views of key stakeholders, agencies, community groups and residents with regards to soundness of the policies and proposals presented within the DPD, along with the evidence base which supported the report.

2.0.2 Publication Draft Report was taken to the Council's Executive Committee for approval for public consultation, and subsequent submission to Secretary of State for Examination in Public and consultation on Modifications, on the 13th October 2015 and to Full Council on the 20th October.

2.0.3 In line with the SCI and requirements of the planning regulations, the Council undertook a planned six week public consultation on the Main Modification from February 2017 to March 2017. The consultation period started 15th February and finished on 29th March 2017, covering 6 weeks in total.

2.1 Consultation and Supporting Documents

2.1.1 The following documents were produced and made available for the Modifications consultation:

- Waste Management DPD: Schedule of Main Modifications
- Bradford Waste Management DPD Main Modifications Sustainability Appraisal Addendum Report and Appendices
- Bradford Waste Management DPD Main Modifications comment form
- Bradford Waste Management DPD Main Modifications comment form guidance note.

2.1.2 Copies of the key consultation documents were placed for inspection at the following deposit locations listed below. Notifications of these locations were given in the consultation letter and on the council's website. Deposit locations were:

- Planning Offices in Bradford (Britannia House)
- Ilkley Town Hall
- Council One Stop Shop at Keighley
- in the main local libraries in Bradford, Shipley, Bingley, Keighley and Ilkley

2.2 Who was consulted?

2.2.1 Approximately 1,800 stakeholders, members, groups and individuals were invited to make comments to the Schedule of Modifications. The table below indicates those persons or bodies consulted. These are organised in line with the SCI.

Consultees List	**Number of consultees**
Statutory consultees	100
Previous respondents to Bradford Waste Management DPD consultation	347
Other consultees	39
Councillors	90
LDF Notification List	1564
Total	2140

2.3 How the public and other stakeholders were consulted

2.3.1 The council used a number of different methods of community consultation and engagement which aimed to reach the different groups within the district. The ranges of methods used are outlined below:

2.3.2 A total of 2140 written notifications were sent out on Monday 13th February 2017, either by letter or by email, to individuals, community groups, developers, agents and infrastructure providers in line with the SCI, notifying them of the consultation, how to view the documents and inviting them to make comments before the set deadline. A sample of the letter can be found in Appendix 2.

2.3.3 The table below provides a summary of who was consulted and by what means.

Links to SCI	**Consultee**	**Method of notification**
Specific Consultation Bodies	Statutory Bodies Town & Parish Councils	Letter and email
General Consultation Bodies	General Consultees	Email
Other Consultees	Other Consultees	Email
List of Other Organisations and Groups not identified in Planning regulations	Bradford Councillors	Email
	Notification Request	Email
	LDF Newsletter Subscribers	Email
	Previous respondents to DPD consultation	

2.3.4 The Council issued a press release in December following Council Executive approval for public consultation. A copy of this can found in Appendix 2. Local news press / media provided coverage on the Modifications consultation. In particular, the Telegraph and Argus ran an article to highlight the draft plan and how to get involved for the local communities. The news article published can be found in Appendix 2. The following newspaper articles were published by the Telegraph and Argus, and Keighley News:

10th February 2017
http://www.thetelegraphandargus.co.uk/news/15084835.Waste_plans_have_to_be_amended__Government_rules/

18th February 2017
http://www.thetelegraphandargus.co.uk/news/15100222.Views_on_Bradford_Council__39_s_waste_plan_strategy_now_sought/

21st February 2017
http://www.thetelegraphandargus.co.uk/news/15106755.Have_your_say_over_waste_plan/

21st February 2017
http://www.keighleynews.co.uk/news/15106755.Have_your_say_over_waste_plan/

2.3.5 The **Council's local plans website** (www.bradford.gov.uk/planningpolicy) was used to facilitate communication of the consultation and the time period. Consultation documents were made available to view and download throughout the consultation process and details of the technical and area 'drop-in' events were advertised. Details of how people could comment on the consultation documents, along with a comment form and online survey were clearly provided. A copy of the webpage can be found in Appendix 2.

Schedule of Consultation Responses

3.1.1 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

Rep No.	Customer Ref No.	Consultee	Group/Organisation
2.	0002	North Yorkshire County Council	
3.	0003	Debbie Alstead	
4.	0004	Chris Breen	
5.	0005	Kenny Priestley	
6.	0006	Tom Swift	
7.	0007	Petra Muff	
8.	0008	Electrosparks	
9.	0009	Mrs Boyes	
10.	0010	Liaqat Ali Khan	
11.	0011	Parveez Ahmed	
12.	0012	Jennifer Kershaw	
13,	0013	Ruth Batterley	Bingley Town Council
14.	0014	David Wood	
15.	0015	Julie Wood	
16.	0016	Linda Heppinstall	
17.	0017	Ian Ireland	
18.	0018	Laura Harrison	
19.	0019	Michael Balmer	
20.	0020	Christine Grayston	
21.	0021	Abi Holmes	
22.	0022	Samantha Havers	
23.	0023	Geoffrey Trigg	
24.	0024	Martyn Fisher	
25.	0025	HannahAdams	
26.	0026	Christine Trigg	
27.	0027	Rob Welsh	
28.	0028	Juliet Bailey	
29.	0029	Victoria Anderson	
30.	0030	Jill Truck	
31.	0031	Eileen Ogden	
32.	0032	Althea Kennett	
33.	0033	Lynne Balmer	
34.	0034	Jonathan Rookes	
35.	0035	Wayne Kershew	
36.	0036	Beverley Eastell	
37.	0037	Nick Betts	
38.	0038	Wendy Halloway	
39.	0039	Paula Malone	
40.	0040	Elizabeth Rose	
41.	0041	Ian Smith	Historic England

42.	0042	Kate Mackenzie	
43.	0043	Jeff Morgan	
44.	0044	Donna Irving	
45.	0045	Jane Stone	
46.	0046	Martin Stone	
47.	0047	Malcolm Sunderland	
48.	0048	Ann Sunderland	
49.	0049	Trudie Jackson	
50.	0050	Joanna Dix	
51.	0051	Emma Jane Hughes	
52.	0052	Jill Tuck	
53.	0053	Lucy Bannister	
54.	0054	Stuart Bannister	
55.	0055	Sue Barker	
56.	0056	Andrew Taylor	
57.	0057	Karen Hiscoe	
58.	0058	Molly Ridley	
59.	0059	Liam Dent	
60.	0060	Edwin Nash	
61.	0061	Kirsty Nelson	
62.	0062	Joe Nelson	
63.	0063	Lindsey Roberts	
64.	0064	Dyann Healey	
65.	0065	Adrian McHugh	
66.	0066	Leonidas Savidis	
67.	0067	Marie-Therese Frazer	
68.	0068	Kathryn Sheehy	
69.	0069	David Wolverson	
70.	0070	Julie Narey	
71.	0071	Sarah Fairlamb	
72.	0072	Lynsey Griffiths	
73.	0073	James Wollaston	
74.	0074	Joanne Wollaston	
75.	0075	Rhonda Myers	
76.	0076	Joanne Hall	
77.	0077	Roland Wright	
78.	0078	Richard Falkingham	
79.	0079	Seam Myers	
80.	0080	Rebecca Aydon -Butler	
81.	0081	Amanda Crawshaw	
82.	0082	Penny Campbell	
83.	0083	Ros Brown	
84.	0084	Roger Campbell	
85.	0085	Andrew Docherty	
86.	0086	April Knox	
87.	0087	Amanda Eggleston	
88.	0088	Rebecca Hutchinson	
89.	0089	Chrysostomos Savidis	
90.	0090	Edith Savidis	
91.	0091	Richard Eyers and	

		Laura Bowden	
92.	0092	Simon Shimbles	
93.	0093	Tim Holt	
94.	0094	Rachel Shimbles	
95.	0095	Rachel Clarke-Wood	Environment Agency

3.1.2 SCHEDULE OF WRITTEN REPRESENTATIONS

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
004	Chris Breen	Me, 4 bins (one I pay for), recycling. My neighbours at 27 and 29, 2 green bins, everything, including garden waste, goes into them, and of course left out all day, everyday, blocking the footpath. You can plan what you want but until you sort out people like this it's a pointless exercise. C M Breen (Mr) Includes photographic evidence to show problems with wheelie bins outside residential properties	The comments raised in this representation do not appear to relate to the proposed modifications or Waste Management DPD in general. Therefore these comments will not be addressed further in the Statement of Consultation.	No action taken.
005	Kenny Priestly	How are people expected to lodge their objections on the proposed plan for an incinerator in the Aire Valley when the council's website is not fit for purpose? Many people are reporting long waiting times and having to constantly refresh pages whilst trying to lodge objections. Some people cannot even see the page whilst others are reporting the page timing out whilst only half way through writing their objections. What exactly do the council intend to do about this?	The comments raised in this representation appear to be a general objection to the application on Site WM3. Therefore the comments will not be addressed further in the Statement of Consultation.	No action taken.
0013	Bingley Town Council	AM20 According to the text in Matter 6 of CITY OF BRADFORD	The Council welcomes comments on Additional	No action taken.

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		METROPOLITAN DISTRICT COUNCIL BRADFORD WASTE MANAGEMENT DPD – EXAMINATION POINTS OF CLARIFICATION ARISING FROM COUNCIL'S RESPONSES TO THE INSPECTOR'S SCHEDULE OF MATTERS, ISSUES & QUESTIONS (24.11.16), Bradford Council states: The current application on this site submitted in August 2016 (16/06857/FUL) is a modification to the proposals in 2013 and 2015, and is for a conventional energy from waste plant and a waste plastics melting plant for biofuel. The pyrolysis plant has been removed from the proposal. The application remains undetermined. Therefore, surely the modification AM20 should read: Any enclosed recycling activity, **Conventional** Energy from Waste Facility. Mechanical Biological Treatment, Clean Material Reclamation Facility, Dirty Material Reclamation Facility, In-Vessel Composting Facility, Anaerobic Digestion Facility **EXCEPT FOR** Pyrolysis and Gasification Facility **and Advanced Thermal Treatment**. There needs to be absolute clarity about which processes are allowed at WM3. In addition, at the very least, the words *Pyrolysis and Gasification Facility* should remain and not been struck though or replaced by the phrase " Advanced Thermal Treatment". This latter phrase is a euphemism that makes the processes and their outputs sound more palatable than the reality. AM 1-5 Comment: residents in the Aire Valley were not sufficiently	Modifications and will make changes where it considers necessary. However, as these do not relate to soundness, the Council will not address these any further within the Statement of Consultation.	

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		consulted on the implications of the waste management plan. It was not made clear that Bradford Council wishes to impose an unacceptably large incinerator in a semi-rural setting. The description of site WM3 on page 24 of the Waste Management Development Plan document (Nov 2015) does not indicate the scale of the development – and does not, in the mitigation, reference the site's semi-rural location in a valley bottom. The lack of clear and accessible information provided by Bradford Council, that adequately conveyed the implications of the waste management proposals in a manner, language and through methods accessible to the majority of residents, should be noted in this modification. AM13 Replace the word "comprehensive" with "biased, secretive and unpublicised". The phrase "short list of potential site allocations" should remain as there is no evidence or publicly available documents that show how the shortlist became allocated sites. AM 15 The word "shortlisted" should remain and not be replaced by "allocation" as there is no supporting evidence to show allocation in the case of site WM3. AM16 In the phrase "The following sites are identified as suitable allocations **have been allocated** for waste management facilities, with sufficient capacity…etc" The words "are identified as suitable allocations" should remain and not be replaced by "have been allocated" as there is no publicly available evidence or		

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		documentation explaining allocation in the case of site WM3. 'there is no publicly available evidence or documentation explaining allocation in the case of site WM3'. Whilst, page 18 of the DevelopmentPlan refers to Site Assessment Report (January 2011), Revised Site Assessment Report (October 2011), docs which are presumably the basis of allocation, more details of the traffic light system and any consultation around these measurements are not provided. In addition, whilst CBMDC has approved planning permission for an incinerator on this site, WM3 had not been specifically allocated as a site and the planning approval may yet be called in by the Secretary of State for Communities and Local Government.		
0036	Beverley Eastell	I would like to make a further representation on the Bradford Waste Management DPD's proposed modifications. I understand that my first representation on the original Waste Management DPD is currently with the inspector. I would also like to make you aware that my original concerns and objections (email dated 23rd January 2016) for allocated site WM3 (site formerly 78) Aire Valley Road, still stand. I am also of the option that these proposed modifications are unsound in relation to their effectiveness, justification, positive preparation or consistency with National Policies NNPF/NNPW regarding site WM3. If either planning applications 13/04217/FUL (approved 2014) or 16/06857/FUL (granted but currently on hold) are to be built on this site, then these types of facilities will also be contrary in parts to the Waste Management Development	The Council welcomes comments on Additional Modifications and will make changes where it considers necessary. However, as these do not relate to soundness, the Council will not address these any further within the Statement of Consultation.	No action taken.

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Plan! **<u>AM20 Site WM3:</u> (Positively Prepared & Consistent with National Policy NNPF/NNP - unsound)** • Site WM3 is one of the 6 sites that have been identified as having the potential to accommodate different types of waste management facilities. Amendments have been made to the terminology text on the Waste Management DPD Schedule Major and Additional Modifications. Clarification needs to be made on the said amended text due to it now stating "Conventional" Energy from Waste Facility, processes Pyrolysis and Gasification having been crossed out and Advanced Thermal Treatment now added. • How does a "Conventional" EFW facility differ from an EFW facility? • If the processes Pyrolysis and Gasification are no longer permitted, then how is the process Advanced Thermal Treatment different? My understanding is there is no difference due to Advanced Thermal Treatment being a term applied to processes including Gasification and Pyrolysis. • Also, the Plastic Melting Plant proposed for Site WM3 will use fractional depolymerisation to produce diesel oil. The plastics will be made into a slurry before being heated to a high temperature (hydrous-pyrolysis). As the oil is		

GENERAL COMMENTS				
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		heated it enters a gaseous stage. So, technically this is a Pyrolysis and Gasification process and contrary to the Waste Management DPD modification **AM20**, **SA objectives SA4 and SA5.** **Site WM3 Summary**: • The Site is visually prominent and near two Bradford Wildlife Sites so neutral and uncertain effects have been recorded for this reason. I believe that both the significant positive effect and the minor negative effect are questionable due to the unlikelihood of rail freight coming to fruition anytime soon and the "minor" negative effect should be graded "major" negative due to the historical significance of East Riddlesden Hall being Grade 1 listed not Grade ll*. Incineration, pyrolysis or gasification are proposed so with regards to the stack "how tall, is very tall" to mitigate the effects on the Natura 2000 sites? Also, will the proposed 60 metre (196.85 ft.) stack be adequate in this regard? Taking this into consideration, this site summary seems to be less than favourable in its traffic light grading regarding the suitability of site WM3 for incineration, pyrolysis or gasification. If either planning applications 13/04217/FUL (approved 2014) or 16/06857/FUL (granted but currently on hold) are to be built on		

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		site WM3 then such a facility will be: Contrary to the **Vision and Waste Site Assessment objectives: SA2**, **SA3, SA4, SA5, SA6, SA7, SA8, SA9, SA10, SA11, SA12, SA15, SA18.** Contrary to **Policy W1: Cross Boundary Working Site Assessment objectives: SA2, SA3, SA5, SA8, SA9.** Contrary to **Policy W2: Bradford's Future Waste Capacity Requirements Site Assessment objectives: SA4, SA5, SA7, SA9, SA10, SA11, SA12, SA15, SA17, SA18.** Contrary to **Policy WDM2: Assessing All Applications for New, Expanded and Residual Waste Management Facilities Site Assessment objectives: SA3, SA4, SA5, SA7, SA9, SA10, SA11, SA12, SA15, SA16.** Considering all the above, I feel that the proposed modifications, the suitability and the sustainability for an EFW facility on Site WM3 are unsound. It contradicts the Bradford Waste DPD and National Policies on numerous accounts and many questions are still to be answered. The proposed changes that I would consider in relation to the soundness of this plan would be a facility that wouldn't contradict the Waste Management DPD or National Policies. It wouldn't be detrimental to the environment, heritage assets or residents and would be a viable project, including greater employment		

GENERAL COMMENTS				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		opportunities for locals. A "low level" enclosed recycling facility (with fitted solar panels) would be a good scenario. This type of facility would be more in keeping with its locality, it would limit personal gain and it moves waste management up the waste hierarchy but further assessments and mitigations would be needed with any scenario.		
0095	Rachel Clarke-Wood Environment Agency	We have the following comments to make. We queried the collected waste figures that had been provided and the double counting of these. We received confirmation from the LPA of the difference in LACW figure previously presented in the submission draft and the modifications of approximately 25,000 tonnes. It was confirmed this related to non-household waste as the LACW total includes 19,589 tonnes of C&I waste and 3,840 tonnes of CDEW. To avoid double counting, this figure was deducted from the overall LACW figure. We have no further comments to add to the modifications.	Noted.	No action taken.

MM1				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	I am aware that, Bradford needs to take responsibility for the waste it generates by taking steps to manage that waste via sustainable	MM1 refers the insertion of new text in the Vision	No action taken.

MM1				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		waste management. I also understand the importance of moving the management of that waste up the waste hierarchy but the method of "other recovery" (EFW incineration etc.) isn't the way forward. "Other Recovery" is only one step up from the bottom of the waste hierarchy (with landfill being the bottom) and is not an efficient or effective way of diverting waste from landfill. Local councils should be looking at ways to prevent, recycle and re-use waste rather than using incineration or landfill to depose of it. It states in this modification **"We aspire to achieve net self-sufficiency, managing the waste we generate at the nearest appropriate facilities".** Site WM3 is situated on the A650 Aire Valley trunk road, Keighley, which is 12km outside Bradford City Centre. Its location isn't near any appropriate facilities nor any major motorways so the commercial and industrial waste that will be delivered to the site will travel via local road networks. These routes are already congested and depending on where these HGV's originate from, the village of Saltaire, a World Heritage Site, will be the main thoroughfare. This could lead to significant heritage harm! It is proposed that approximately 70 HGV's will enter and exit the facility between the times; 07:30 to 18:00 Monday to Fridays and 38 HGV's 07:30 to 12:00 on Saturdays. That's 6.6 movements per	relating to model shift in the transportation of waste arising's and how this will aid in climate mitigation and adaptation. The comments made in the representation do not appear to address the new text, but instead appear to be an objection to the use of Other Recovery via Energy from Waste and the use of Site WM3 for a waste management facility.	

MM1				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		hour during the week and an average 8.4 movements per hour on Saturdays. Using this type of waste transportation will significantly increase air pollution caused by transport fumes and this type of pollution is already at crisis point within the Bradford area! This is also contrary to the Addendum to Sustainability Appraisal Report objectives SA9: "Reduce nuisance caused to communities by waste transport" and SA3: "Reduce the District's impact on climate change and vulnerability to its effects".		

MM2				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0013	Bingley Town Council	"To ensure that expansions to existing facilities where appropriate and new waste facility developments support the planned growth and waste needs of the Bradford community and are delivered in a manner which protects **and enhances** the District's environmental assets and safeguards human health" Add: if this is not adequately demonstrated by any proposed scheme then planning approval must be refused.	The Objectives set out in the Waste Management DPD are to be achieved through the Planning Policies and Allocated Sites put forward within the document. The DPD contains Policies and Allocation Statements which safeguard	No action taken.

MM2				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
			environmental assets and human health, which will be used to refuse applications for development proposals which do not adequately demonstrate this safeguarding. The Council therefore do not consider this modification necessary.	
0041	Ian Smith, Historic England	MM2 Objective 3 - Sound The Glossary to the NPPF makes it clear that, in terms of the historic environment, "conservation" is the process of managing change to ta heritage asset in a way which sustains and "where appropriate" enhances its significance. Therefore, in terms of the historic environment, enhancement should only be pursued where it is appropriate in order to better reveal the significance of that particular asset. Objective 3 amend to read:- "and, where appropriate, enhances the District's environmental assets"	The Council is of the opinion the enhancement of the Historic Environment should only be made where appropriate and thus the recommended modification shall be put forward.	"and**, where appropriate,** enhances the District's environmental assets"

MM3				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**

MM3				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	At this moment in time Bradford doesn't have the "appropriate facilities" to deal with the increasing commercial and industrial waste that will arise in the area. But the greatest need for this waste stream after "prevention" is recycling and not "Other Recovery" (EFW incineration). The existing capacity gap for recycling commercial and industrial waste (plus LACW) is 444,225 tonnes which, is significantly greater than Energy Recovery at 102,346 tonnes. Only 1 new additional EFW facility would be required over the lifetime of the plan, whereas 4 new additional recycling facilities would be needed by 2030 due to the forecast waste arising being 572,863 (capacity requirements). Also, the Waste DPD Site Requirements Study allocated 6 suitable sites and all these 6 have been identified as having the potential to accommodate Conventional Energy from Waste and advanced thermal treatment facilities. Several of these sites (including site WM3) have also been identified as having potential to accommodate more than one type of waste management facility e.g. enclosed recycling plant etc.	The Council's waste management hierarchy prioritises opportunities for the management of waste to be firstly prevented, reused and then recycled before 'other recovery'. For the Plan to be Effective, it must demonstrate sufficient flexibility to encourage delivery and allow for changes in circumstances. Allowing the widest range of waste management technologies on sites allows the Plan to be flexible enough to adapt to any future changes and will encourage the delivery of waste management infrastructure.	No action taken.

MM3				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Taking these facts into consideration the planned building of a C&I Energy from Waste facility on site WM3 will not have a significant impact on the growth and waste needs for C&I waste within the Bradford Community and another type of waste management facility would be more beneficial! The Energy from Waste Facility (RDF incinerator) and plastic melting plant (fractional depolymerisation/hydrous-pyrolysis) that are planned for Site WM3 will not protect or enhance the district's environmental assets or safeguard human health and are contrary to the **SA4 objective: "Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites"** due to: • being in a prominent location on a narrow valley bottom, • frequent weather inversions, • the size, mass, volume and industrial façade being out of character to its surroundings, • its emissions from the 80 metre (262.46 ft.) plume could contribute to acid deposits on the South Pennine Moors SPA/SAC (locally called Rombald's Moor), • increased air pollution, including traffic fumes	The Sustainability Appraisal has identified Site WM3 as having a neutral impact upon Objective SA4. The Council considers the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill	

MM3				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		• pumping surface water from the facility into the River Aire, • close proximity to Heritage Asset, Grade 1 listed building East Riddlesden Hall/Grounds. • top of the 60 metre (196.85 ft.) stack being almost level with residential properties on the valley sides, • the vast radius of emission disposal, • production of dust and noise, plus emissions of NOx and CO2 into the air.	schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment. It should also be noted that operators of proposed waste management facilities also need to apply for an Environmental Permit, which will assess the emission from the facility.	

MM4				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM5				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	The Sustainability Appraisal Addendum Assessment Matrices, states that **"The site has one significant positive effect, which relates to the site's suitability for freight transport"** (rail freight). Yes, the railway line does run to the South of the proposed site but this is the main commuter line that connects Leeds and Bradford to Skipton and vice versa. There are no viable infrastructures to transport waste via rail freight to this facility. Also, major constraints onsite including high pressure gas mains make it almost impossible for this mode of transport to be used. Due to the proximity of the railway line the developers have looked at this mode of transport as an alternative to road freight but the developers themselves state, **"this was not practicable or feasible for a number of reasons, including the relatively low volume of waste which may be sourced from various outlets and physical space on site which is further restricted by the number of constraints/standoffs for Northern Gas Networks infrastructure and Yorkshire Water Infrastructure".** (source: Regulatory & Appeals committee public report pack. Paragraph 11.33 page 40). There may be a slight possibility in the future to use this as an alternative mode of transport, however I believe this is highly unlikely and certainly won't be for many, many years, if at all. Taking this into consideration maybe this SA objective shouldn't be	MM3 refers to the insertion of new text relating to the need to work collaboratively in promoting modal shift. The comments raised in this objection do not appear to address the modification but instead relates to an objection to the Site WM3 scoring positively in the SA for the potential to use rail freight in the transportation of waste. The Council is of the opinion Sustainability Appraisal has assessed the site correctly, with the potential transport waste to the site as a possibility and thus scoring positively.	No action taken.

MM5				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		deemed to be “a significant positive effect”.		

MM6				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM7				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM8				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM9				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM10				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM11				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM12				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM13

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATION RECEIVED		

MM14				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM15				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM16				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM17

Rep ID	Name / Organisation	Summary of Representation	Council Response	Action(s) Required
		NO REPRESENTATION RECEIVED		

MM18				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM19				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATION RECEIVED		

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0003	Debbie Alstead	Further to the article in the Telegraph & Argus re feedback on Bradford's Waste Strategy, please can you tell me how the proposed Aire Valley Incinerator that was unanimously voted in favour for by Bradford Planning Officers, fits into your Waste	The Council is of the opinion that MM20 will enhance the visual, landscape and	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Strategy exactly? My feedback to you for your Strategy is do not allow commercial and industrial waste with potentially toxic fumes, to be trucked in from outside the area when we don't know what it is and how it will affect the health and wellbeing of the local population, let alone damage house prices and tourism. Your Strategy should include a clause that does not allow incinerators to be built in the valley bottom where an 80 metre high chimney stack will churn out toxic fumes over the whole local population particularly those who live above the plume which means the smoke will be right in our faces. Your Strategy should ban all commercial and industrial waste, should ban large scale incinerators that do not benefit the local area, are not needed and potentially put in a totally inappropriate location. Local towns should have local recycling areas for household waste only, not industrial scale, non-identifiable potentially toxic waste that will be to the detriment of everyone who lives and visits here.	environmental safeguards put forward in the allocations statement to ensure significant detrimental impacts are avoided and enhancements sort through the development of Site WM3. The Council are of the opinion the contents of the allocation statement, in combination with the proposed modification MM20, address the relevant issues put forward in this representation.	
0006	Tom Swift	I object to the planning application ref: 16/06857/FUL. My objection is based on the following grounds; 1. Visual Impact of the Development. The proposed development is over a very large area. Multiple buildings are planned, some of which are huge, industrial complexes, which will have a detrimental impact on the area and the surrounding area.	This representation relates to an objection to the planning application on Site WM3 and not the Waste Management DPD. Taking this into account, the Council will not address the comments	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		2. Adverse effect of the development on the setting of a nearby Listed Building. East Riddlesden Hall is a Grade 1 Listed Building. It is a mere 500m away from this proposed industrial complex. It is undeniable that the air pollution, visual eye sore and noise generated by this waste site will have a massive and negative impact on this listed setting. The setting of this historic building will not look good with a huge industrial building, large smoke stack, and plumes of toxic smoke flowing over it. 3. Setting and Location. The proposal is on a valley floor. Natural air movements and wind directions will carry all odours/pollutants throughout all neighbouring towns/villages and over the dense nearby residential areas. The immediate vicinity is used for sporting and recreational activities. This development would have a huge negative effect on those activities. Please take into account the view of the 1000's of people objecting and decline this development.	raised within the Statement of Consultation.	
0007	Petra Muff	I am astounded that planning permission has even been considered for this incinerator in an area that is renowned for poor air quality and for trapped pollution within the valley due to the common temperature inversion here.	This representation relates to an objection to the planning application on Site WM3 and not the	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		The fact that Endless Energy had to reapply for planning permission due to the fact that the incinerator wouldn't fit in the building in their original plan is extremely worrying. If they are this incompetent in their planning, it doesn't bode well for the safe management of a potentially dangerous plant. On top of these concerns, the extra traffic that would travel on the Bingley bypass and through Saltaire will have a large negative impact on the local area. Also, this planned building will be a huge eyesore in a beautiful valley. Please reconsider and reject this application.	Waste Management DPD. Taking this into account, the Council will not address the comments raised within the statement of consultation.	
0008	Electricsparks	I think the energy plant which might be built in the Stockbridge area of Keighley should go ahead. Making energy from waste is an excellent idea. The site is next to the bypass on waste land. Any building on this site would be a great improvement. At the moment the site looks horrible and has done so for years. So please help the environment and the present eye soar by approving the plans. Please also allow for more wind turbines in the whole of the Bradford area. Let's become the best low carbon area in the UK. Bradford was once the leading place in the world for technology. Let us be so again.	This representation relates to an objection to the planning application on Site WM3 and not the Waste Management DPD or specifically MM20. Taking this into account, the Council will not address the comments raised within the Statement of Consultation.	No action taken.
0009	Mrs Boyes	I write regarding the planned Aire valley incinerator. Firstly it is with utter dismay that efforts to inform the public on this matter	This representation relates to an objection to	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		prior to its approval we're kept to a bare minimum. Please refrain from advising us that we should read the Keighley News. In this day and age do you really think this gets the message out, only 8k copies are purchased and the majority who buy it are elderly. In addition I understand you contacted under 1000 residents directly. Given the magnitude of this plan surely better efforts should have been made, even on a moral basis! Every house that has to look at it or see it's plume should have been consulted. I'm sure you feel you met the required standard however, you alone are responsible for the thousands and thousands and thousands of residents left completely unaware until it was passed. I was walking in the grounds east Riddlesden hall this week along the river with my children. I'm sorry but a few trees aren't going to save this place from the proposed monster. How dare you take this from us. You have washed your hands regarding health concerns of the local population, demonstrating a total disregard for what think, dismissing these concerns as not your issue given you are there to consider our interests is frankly harmful. This will absolutely effect tourism visual amenity will be disastrously effected, let's face it it's ugly and thousands will have to look at it, it's next to a school and you may as well close Marley playing field, would you take your children there, I won't be.	the planning application on Site WM3 and not the Waste Management DPD or specifically MM20. Taking this into account, the Council will not address the comments raised within this document, but will instead be addressed in the assessment of the planning application. The Council are of the opinion the Policies and Allocation Statement put forward within the Waste Management DPD are sufficient to avoid the detrimental impacts raised in this comment and seek enhancements where possible and appropriate.	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		More HGVs going through Saltaire, a national heritage site... perfect!!! Frankly this project completely contradicts your own waste management policy. Disgraceful. Why not plan this near the m606. Already industrial, good networks... not at the bottom of a valley which has regular temperature inversion, or next to a school or where there are thousands of residents or where there are playing field or near a national trust site or where the toxic air will plume over many primarily schools, or where respiratory issues are already rising... the list of complaints is endless. Also please give definite clarity on the obligation to employ local people... which will be permanent. This is widely assumed as misleading. You have been very disrespectful and caused harm to the community already in this process. Something of such magnitude which effects the community far and wide should have been contacted directly as part of the consultation process, the Keighley News cannot be relied upon. It is no wonder your website constantly crashes, imagine how many objectors there would be if your system was adequate.		

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Sadly you have done very little to demonstrate the positives of this, you don't even know what they will be burning. I am planning to take my professional skills and my children out of the area because of this as are many others. Shame on you.		
0010 0011	Liaquat Ali Khan Parveez Ahmed	I am opposed to the location of AWM and any proposed extension of the Waste Plant. The odour has caused me and my neighbours a great deal of distress and frustration. The company's activity is adversely impacting on health and wellbeing of all the local community. The smell is often strong enough to make us ill. Due to the repugnant stench my family and I are often unable to use our garden, hang our washing out or even open a window. For this reason we feel that this kind of industry and facility should be managed in a location where it would not impact on members of the public. It is better suited to an industrial complex and not a residential location. The area has schools, shops and places of worship. The health of thousands of local tax paying citizens should be of a higher priority than the profit of a misplaced management site.	This representation relates to the Associated Waste Management (AWM) facility in Victoria Works, Barnard Road, Bradford. MM20 does not relate to this facility and thus the comments raised within this representation will not be addressed further within this document.	No action taken.
0012	Jennifer Kershaw	I am writing to object against the incinerator planned for Keighley. 1. I am very concerned about the health of anyone who will be breathing the toxic air pollution, especially as it is in a valley. 2. I feel that Keighley has been chosen because it is a deprived area where many local residents will not resist the development. 3. There will not be enough long term jobs created for local	This representation relates to an objection to the planning application on Site WM3 and not the Waste Management DPD or specifically MM20. Taking this into account, the Council will not	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		people. I was born in Bradford and have lived away since the age of 18 for approximately 15 years. I moved back 7 years ago when I started a family to be close to my parents, and because I really want Bradford to 'work' and improve, in spite of national opinions about Bradford. I have been very positive about hopeful about Bradford, but I was already regretting the decision to move back before the incinerator plans. Now I feel devastated and disgusted with the council. Bradford offers very little for 'middle-class' working families and therefore people rarely choose to move here, and frequently choose to move away. Surely the council need these families to pay the council tax and spend money in the area. I realise Bradford Council has many problems to deal with but the current spending plan is driving people like me away. Please reconsider the plans for the incinerator. This will devastate the area.	address the comments raised within this document, but will instead be addressed in the assessment of the planning application. The Council are of the opinion the Policies and Allocation Statement put forward within the Waste Management DPD are sufficient to avoid the detrimental impacts raised in this comment and seek enhancements where possible and appropriate.	
0012 0014 0015 0016	Jennifer Kershaw David Wood Julie Wood Linda Heppinstall	The major modification does not take account of the Habitats Regulations Screening Assessment report dated June 2012 which recommended that the site is not used for any purpose that emits pollution to air, such as from an incinerator, gasification or pyrolysis plant because of the detrimental effect such processes would have on vegetation communities of the South Pennine Moors (e.g. Rombalds Moor).	The Council are of the opinion MM20 addresses the issue of any potential significant detrimental impact upon the SAC / SPA through the needs for a project level Appropriate Assessment (AA) if it is determined by	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0017 0018 0019 0020 0021 0022 0023 0024 0025 0026	Ian Ireland Laura Harrison Michael Balmer Christine Grayston Abi Holmes Samantha Havers Geoffrey Trigg Martyn Fisher Hannah Adams Christine Trigg	The major modification does not take account that the site is in the bottom of a highly populated, steep sided valley that is prone to regular temperature inversions that would make it unsuitable for any purpose that emits pollution to air, such as from an incinerator, gasification or pyrolysis plant. Thus any pollutants emitted during such a weather event would not disperse above the valley sides, to the detriment of the settlements in the valley. The major modification does not take account that the siting of a plant that emits pollution to air, such as from an incinerator, gasification or pyrolysis plant within this part of the Aire Valley would contradict advice provided by the World Health Organisation (WHO) that states such facilities should not be sited in valley bottoms, near to settlements, adjacent to agricultural land and in close proximity to sports facilities. Before site development takes place the following effects will need to be adequately investigated, mitigated and addressed by the applicant, who should be able to demonstrate through	an appropriate body that such an assessment is required. The Council considers the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land,	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0027 0028 0029 0030 0031 0032 0033 0034 0035 0037 0038	Rob Walsh Juliet Bailey Victoria Anderson Jill Tuck Eileen Ogden Althea Kennett Lynne Balmer Jonathan Rookes Wayne Kershaw Nick Betts Wendy Halloway	independent investigations and verifications that there are no adverse effects on: The Grade 1 listed building to the north west of the site: Designated protected areas of historic interest or nature conservation landscape; including habitat loss or fragmentation; The Marley Stadium sports facilities and playing fields; the Croft including Regency Court Specialist Care Home; Strong Close Nursery School & Children's Centre; as well as agricultural land to the north south and east. Furthermore the applicant will have to demonstrate before development of the site takes place that any proposed facility should be able to operate during the frequent temperature inversions within the valley without causing nuisance or endangering health consequent of emissions being unable to escape into the upper atmosphere by normal convective means.	infrastructure, natural resources and the historic environment. The Council are of the opinion the points raised in this part of the representation have been addressed in the production of the Waste Management DPD. The Council's Site Assessment Report and Sustainability Appraisal have assessed the impact upon a number issues raised within the representation visual / landscape impact historical / cultural impact proximity to sensitive uses	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0039 0040 0044 0045 0046 0047 0048 0049 0050 0051 0052 0053	Paula Malone Elizabeth Rose Donna Irving Jane Stone Martin Stone Malcolm Sunderland Ann Sunderland Trudie Jackson Joanna Dix Emma Jane Hughes Jill Tuck Lucy		It should also be noted that operators of proposed waste management facilities also need to apply for an Environmental Permit, which will assess the emission from the facility.	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
	Bannister			
0054	Stuart Bannister			
0055	Sue Barker			
0056	Andrew Taylor			
0057	Karen Hiscoe			
0058	Molly Ridley			
0059	Liam Dent			
0060	Edwin Nash			
0061	Kirsty Nelson			
0062	Joe Nelson			
0063	Lindsey Roberts			
0064	Dyann Healey			

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0065	Adrian McHugh			
0066	Leonidas Savidis			
0067	Marie-Therese Frazer			
0068	Kathryn Sheehy			
0069	David Wolverson			
0070	Julie Narey			
0071	Sarah Fairlamb			
0073	James Wollaston			
0074	Joanne Wollaston			
0075	Rhonda			

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
	Myers			
0076	Joanne Hall			
0078	Richard Falkingham			
0079	Sean Myers			
0080	Rebecca Aydon – Butler			
0081	Amanda Crawshaw			
0086	April Knox			
0087	Amanda Eggleston			
0088	Rebecca Hutchinson			
0089	Chrysostomos Savidis			
0090	Edith Savidis			
0091	Richard Eyers and Laura Bowden			

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0092 0093 0094	Simon Shimbles Tim Holt Rachel Shimbles			
0013	Bingley town Council	According to the text in Matter 6 of CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL BRADFORD WASTE MANAGEMENT DPD – EXAMINATION POINTS OF CLARIFICATION ARISING FROM COUNCIL'S RESPONSES TO THE INSPECTOR'S SCHEDULE OF MATTERS, ISSUES & QUESTIONS (24.11.16), Bradford Council states: The current application on this site submitted in August 2016 (16/06857/FUL) is a modification to the proposals in 2013 and 2015, and is for a conventional energy from waste plant and a waste plastics melting plant for biofuel. The pyrolysis plant has been removed from the proposal. The application remains undetermined. Therefore, surely the modification AM20 should read: Any enclosed recycling activity, **Conventional** Energy from Waste Facility. Mechanical Biological Treatment, Clean Material Reclamation Facility, Dirty Material Reclamation Facility, In-Vessel	The Council are of the opinion the wording put forward within the Allocation Statement is clear to what facilities are considered an appropriate on the site. The use of the terms "Pyrolysis" and "Gasification" are considered restrictive and the insertion of "Advanced Thermal Treatment" is considered	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Composting Facility, Anaerobic Digestion Facility **EXCEPT FOR** Pyrolysis and Gasification Facility **and Advanced Thermal Treatment**. There needs to be absolute clarity about which processes are allowed at WM3. In addition, at the very least, the words *Pyrolysis and Gasification Facility* should remain and not been struck though or replaced by the phrase " Advanced Thermal Treatment". This latter phrase is a euphemism that makes the processes and their outputs sound more palatable than the reality. MM20 **Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;** **The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or SAC will need to be assessed through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required ."** The words "if it is determined by an appropriate body that such an assessment is required" should be deleted/struck through. Given, the SAP/SAC status of surrounding countryside, an AA should be carried out as a matter of course, without need for a determination of its requirement by an appropriate body (reference: Article 6(3) of the European Habitats Directive).	more flexible and thus ensuring the plan is Effective. The Council consider the requirement for an applicant to submit project level Appropriate Assessment without it being determined as necessary by an appropriate body as onerous and thus be over-burdened by the combined requirements of planning policy expectations, contrary to the NPPF (Para 21).	
0036	Beverley	A landscape assessment would be welcomed for Site WM3 due to	The Council are of the	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
	Eastell	the sites visibility and prominence within the area. The site in question is situated on the A650 on the edge of Keighley's industrial area. It is a brownfield site but much of the surrounding area is green belt. Agricultural land with large pockets of residential housing nestle on the valley sides. These residential areas will have a clear view of the EFW facility due to the main building being 35 metres (114.82 ft.) high, this is 5 metres higher than the skeletal frames of the neighbouring gasometers, which are due to be demolished soon. The 60 metre (196.85 ft.) chimney stack plus the 80 metre (262.46 ft.) plume will also be prominent and will be clearly visible from many a vantage point. The height, mass and industrial façade of the proposed development is totally out of character with this locality and will have a detrimental effect on the landscape. A HRA screening assessment has been undertaken regarding the potential impact Advanced Thermal Treatment (pyrolysis & gasification) and Conventional Energy from Waste (incineration) would have on the South Pennine Moors SPA/SAC (locally called Rombald's Moor). Acid deposits on this part of the South Pennine Moor are already in excess of the critical load. The assessment concludes that if combustion processes were to be used for waste management then they could have a significant effect on this part of the moorland and building such facilities on site WM3 would potentially exasperate the current situation. Taking this into consideration, how can BMDC give planning applications 13/04217/FUL (approved 2014) or 16/06857/FUL (granted but currently on hold) approval for Site WM3? It clearly contradicts	opinion MM20 addresses the issue of any potential significant detrimental impact upon the SAC / SPA through the needs for a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required. The Council considers the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		BMDC's Waste Management DPD.	but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment. The Council are also of the opinion the points raised in this representation have been addressed in the production of the Waste Management DPD. The Council's Site Assessment Report and Sustainability Appraisal have assessed the impact upon a number issues raised within the representation visual / landscape impact	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
			historical / cultural impact proximity to sensitive uses It should also be noted that operators of proposed waste management facilities also need to apply for an Environmental Permit, which will assess the emission from the facility.	
0042	Kate Mackenzie	Major modification would be in breach of the Habitats Regulations Screening Assessment Report (2012). This recommended the site was not suitable for any function which emits pollution to air (e.g. incineration) as the effects of the detrimental processes would be far reaching on communities and the environment including the moors. The major modification gives no consideration to the location of the site – the foot of a highly residential valley. The slopes on either side of the valley bottom are higher than the stack and plume combined. Emissions would blow onto those residential areas. The Aire Valley experiences often long periods of air invasion	The Council are of the opinion the points raised in this part of the representation have been addressed the production of the Waste Management DPD. The Council's Site Assessment Report and Sustainability Appraisal have assessed the impact upon a	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		making it unsuitable for incineration, gasification of a pyrolysis plant because gases are trapped. The major modifications takes no account that the site- on a valley floor – would be against expert advice provided by the World Health Organisations et al, which state such facilities (incinerators, gasification and pyrolysis plants) should not be sited next to residential areas, farmlands, sports venues and facilities. The major modifications does not consider of the Grade 1 LISTED Building East Riddlesden Hall and its environs. There needs to be truly independent assessment and investigations into negative impact on: 1) East Riddlesden Hall 2) Marley Sport Complex 3) Strong Close Nursery 4) the Croft Regency Court Home 5) Farmland surrounding the site 6) Designated protected areas of historic/conservation importance. The applicant has submitted no data relating to the characteristics of the Aire Valley. The site is located at a pinch neck in the valley and the slopes on either side of the valley floor rise beyond the height of the intended stack and plume. The applicant has to demonstrate before development of the site to independent assessors that any proposed facility will operate during the valleys many varied weather patterns including air inversions where the cap is at varied heights and often for long hours – without causing nuisance or endangering health as a result of trapped emissions. More rigorous and comprehensive assessment by independent body is required.	number issues raised within the representation visual / landscape impact historical / cultural impact proximity to sensitive uses It should also be noted that operators of proposed waste management facilities also need to apply for an Environmental Permit, which will assess the emission from the facility.	
0043	Jeff	MM20 fails to mention any of the social and public amenities likely	MM20 provides	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
	Morgan	to be affected by the proposed development, to • East Riddlesden Hall (grade 1 listed) distance ¼ mile • Ilkley Moor • St Ives Park Bingley • Saltaire World Heritage Site • Leeds/Liverpool Canal including 5 rise locks • Marley sports centre MM20 fails to take into account the advice of the World Health Organisation which specifically states that such development should not be located in valley bottoms. MM20 fails to mention that the site is not recommended for any project that will emit air pollution – see HRSA dated 6/12. Site development as proposed should not be allowed to take place unless :- • It can be proven, by independent assessment that the social public amenities mentioned above are not adversely affected. • It can be proven, by independent assessment that local residential areas, such as Marley, Riddlesden and Long Lee are not adversely affected • It can be proven, by independent assessment that local social amenities such as schools (Strong Close Nursery, Swire Smith Primary): Regency Court Elderly Care Home are not adversely affected. Before development is permitted, proposed regular environmental checks should be programmed, to be carried out by an independent assessors under the _ _ _ _ of BDMC. The results of	additional wording to the allocation statement. The exisit ing allocation statement addresses the comments raised in this representation by ensuring: "The applicant must demonstrate there will be no detrimental impact upon residents in the surrounding area. Any detrimental impacts arising from the construction and operation of any waste management use on the site must be properly mitigated against. The applicant must demonstrate there will not be a detrimental impact upon the landscape character of the area. Specifically, the	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		such checks, at not more than 6 monthly intervals, should be made public and positive measures identified for failure to comply. I have taken a copy of this paper. In the view of the removal of my objections to the development by BDMC. I no longer trust this body.	applicant must submit detailed information relating to any mitigation against the potential impact of any waste development upon the Grade I listed East Riddlesden Hall." The Council therefore considers the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
			can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	
0068	Kathryn Sheehy	I very strongly object to the proposed building of this extremely dangerous incinerator. Not only will it have terrible health effects on everyone within the area,notably children, Animals, everyone who lives,works,visits this most beautiful valley,it should be thrown out and never be allowed to be even considered...this is total madness. We need clean air and chance to live without extreme health issues which would also impact very highly on the,already,overstretched NHS.	The Council considers the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
			any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment. It should also be noted that operators of proposed waste management facilities also need to apply for an Environmental Permit, which will assess the emission from the facility.	
0072	Lynsey Griffiths	I have been following this issue for a while now, trying to see both sides and I genuinely cannot understand what benefits Bradford Council think this will bring? House prices will deteriorate- I for one have been thinking about moving away from the area and if the incinerator gets the green light, this will be my cue to get our house on the market. Any risk, no matter how small or unknown is not a risk I am willing to take when it comes to the health of my children. I am shocked the case has even come this far. Let's see whether the	The Council considers the relevant planning issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		presumed financial benefits outweigh the costs associated with the claims and complaints a few years down the line. I hope the powers that be see sense before it's too late. Shame on you for not listening to the voice of the people who will be affected by this. I would struggle to get permission to get a fence put up outside my house due the potential impact on the neighbours, yet an incinerator in a valley is OK? I hope you've got your house in order because if this monstrosity actually goes ahead, there will be a lot of questions to follow as to who may have benefited from the outcome	through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	
0077	Roland Wright	The main modifications appears to omit or ignore important factors: - East Riddlesden Hall is not noted as being very close by, which is important as it is Grade 1 listed. The Habitats Regulations Screening Assessment report dated June 2012 has not been taken in to consideration which recommends the site should not be used for any activity that could impact air	East Riddlesden Hall is approximately half a mile from the proposed allocated Site WM3, and thus the Council do not consider this "very close by". However, the allocation statement does state:	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		quality due to the close proximity of the South Pennine Moor (Rombalds Moor) and the impact the activity may have on vegetation communities.	"The applicant must demonstrate there will not be a detrimental impact upon the landscape character of the area. Specifically, the applicant must submit detailed information relating to any mitigation against the potential impact of any waste development upon the Grade I listed East Riddlesden Hall." The Habitats Regulations Assessment has been taken into account during the production of the Waste Management DPD, and includes mitigation measures stated within the allocation statement for Site WM3: When assessing the environmental impacts of	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
			any proposed development on the site, the applicant must take into account any ecological impacts upon the surrounding South Pennine Moors Special Protection Area (SPA) and Special Area of Conservation Area (SAC). The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or SAC will need to be assessed through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required ."	
0082 0084	Penny Campbell Roger	• Concern that the site nomenclature has moved from 'short list' to 'allocated site' without evidence of further consultation- an activity which characterises the whole process surrounding the development of site WM3 and	Consultation on the short list of sites was under taken in 2011 (Preferred Approach Revised	No action taken.

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
	Campbell	others within this consultation • Your description of the valley as having 'poor landscape quality' is a value judgement in a supposedly objective report. Viewed from either side of the valley the area is deemed a pleasant, if unspectacular landscape but greatly valued by those that live there. Any development would need to blend into this landscape [as BMDC landscape officer commented in his reports to planning dept] rather than provide a stark contrast that is reminiscent of industrial archaeology of the 19th century. Visual improvements to the site would need to be of substantial proportions to camouflage which ever waste management facility is installed. • The area is bordered by green belt and playing fields, many homes and a nursery. The aim to 'reduce the impact of the waste industry on people's safety and security and quality of life ' [BMDC 2015] is not going to be achieved by building a waste management facility at this site.	Chapter 5) and again in 2015/ 2016 (Publication Draft), which contained Site WM3 (formerly Site78). The MM20 contains new wording, as follows: "Visual and landscape assessment would be required due to the sites visibility and prominence within the area. Visual improvements to the site should be sought through its redevelopment;" The Council considers this addresses the comment raised in this representation. The Council considers the relevant planning issues raised within this representation are	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or SAC will need to be assessed through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required . *j) The applicant must demonstrate any biodiversity enhancement has been* *fully investigated through an ecological assessment and adverse effects on European Designated Sites are avoided.* The sites' first ecological assessment was carried out in February 2016, a time of the year when neither plant nor animal life is noticeably active. In January 2017 the site was scraped clean when	currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		preparatory works began. Evidence of biodiversity has effectively been removed. Anecdotal evidence reports a mixture of plant and animal life, with deer seen grazing and crossing the site, the small plants and grass providing habitats for insects and small mammals. Not unsurprisingly following a recent planning application it has been deemed that no AA is needed. *The impacts of the proposed waste management facility are adequately* *assessed and the applicant can demonstrate that adverse effects are minimised* • Sites for assessing visibility should be chosen on the basis of what <u>will be</u> seen rather than selecting places where visibility is partially obscured by the landscape, seasonal vegetation or unreasonable camera angles**. <u>Mitigation. Wholly independent surveys done prior to any development.</u>** • The design for ANY development of this site should reflect the surrounding low level industrial and housing in place, not a pseudo-industrial approach that is provocative and unsettling**. <u>Mitigation- Bradford to lead the field in refusing to have incinerators within the BMDC boundaries and to ensure that cross border contamination is closely monitored and the offending neighbouring councils are taken to task.</u>** • Landscape assessment should also investigate the biodiversity of the valley, with SAC/SAP sites, SEGI and Natura 2000 sites. The last one already shows evidence of	The comments raised in this part of the application appear to relate to the planning application on Site WM3 and thus will not be addressed further in the statement of consultation.	

MM20				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		acid deposition at a critical level, any increases due to incineration and the associated increase in HGV traffic would further exacerbate the situation**. Mitigation impossible in this case, other than refusal of planning approval.** • **There are no allowances, financial or otherwise that could mitigate against the harmful effects of living close by a waste management facility such as this**; they would need to actively fund breathing clinics, mental health support units, neo- natal screening units, provide financial support to ailing businesses that could not attract staff, provide significant funds to improve road access to the valley from all directions due to increased congestion and face legal actions [with the council] as there will be mass action from the local population requesting a reduction in council tax following devaluation of their property. The impact on the air quality resulting from incineration/waste management is such that people will no longer be able to enjoy time outside. They will not be able to sit in their gardens, nor open a window because of the polluted air and odours from an installation that processes waste of unknown content. Their children will not play outside and the high rates of childhood obesity that the area is known to have will not be reduced**. What mitigation could possibly be provided that would minimise this effect** other than changing the designation for the site?		

MM21				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0013	Bingley Town Council	MM21 To the paragraph… **Due to the site's proximity neighbouring commercial property, the applicant will be expected to demonstrate how the proposed facility may provide electricity to the national grid via a local connection and the potential for contributing to a wider heat network in the local area within the supporting information of any planning application.** Add: if this is not adequately demonstrated by the applicant then the planning application must be refused.	The Council is of the opinion that should the additional wording suggested in this representation, the allocation statement would no longer be Effective due to the lack of flexibility and allowance for contingency in the delivery of infrastructure (NPPG Paragraph: 018 Reference ID: 12-018-20140306).	
0036	Beverley Eastell	The current planning application 16/06857/FUL proposes that the Energy from Waste Facility will use the energy it produces. Also, electricity that is generated will power the Dalton Lane proposals, planning applications (16/06851/MAO) and (16/06850/MAO) although it is understood that these Dalton Lane proposals will only be built if the EFW facility materialises. Electricity will be supplied to the public supply network (National Grid) via grid connection gables, plant and equipment. The only beneficiaries will be the applicants and this scheme will have no significant benefit to general households. It will also cause major disruption when these gables are laid under public highways from the EFW Plant to the	The comments raised in this representation appear to refer to the planning application on Site WM3 and thus will not be addressed further in the Statement of Consultation.	No action taken.

MM21				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Dalton Lane sites. Due to the proximity of potential heat customers and consideration for the utilisation of the heat produced as an energy source, modification **MM21** states **"the potential for contributing to a wider heat network in the local area within the supporting information of any planning application".** The applicant does mention Combined Heat and Power (CHP) in the public report pack given to the Regulatory and Appeals Committee on the 9th February 2017. Even though the developer states for application 16/06857/FUL that **"the potential for the provision of a steam off take connection to the Data Hotel site and Dalton Mill site will be included in this proposal",** they seem to contradict themselves further in the document by stating **"The references to combined heat and power (CHP), although welcome, are not part of this proposal. The CHP part of the Energy from Waste Facility are potential future developments if the EFW is built. Consequently, the references to use at Dalton Mills and at the office building for CHP is only related to future potential and do not form part of this application".** (source: Regulatory & Appeals committee public report pack: paragraph 11.62 page 46). So, with regards to the infrastructure to enable Combined Heat and Power (CHP) is the above information sufficient to be considered compliant with the National Planning Practice Guidance in		

MM21				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		identifying energy opportunities, also is it compliant with Section 4 of the National Planning Policy for Waste and does it satisfy modification **MM21**?		

MM22				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0041	Ian Smith Historic England	MM22 Site WM4 – Sound subject to a factual correction The nearest Listed Building to this area is the Grade II Listed main office building to the premises occupied by Tanks and Drums Ltd, 175 metres or so to the west of this site on Bowling Back Lane. There are no other Listed Buildings to the west of this site likely to be affected by the redevelopment of this area (the next nearest is on Wakefield Road over 600 metres away). Therefore whilst we welcome the proposed Modification (which will alert all those dealing with proposals for this site of the presence of this designated heritage asset and help to ensure that any redevelopment takes place in a manner which conserves those elements which contribute to its significance) the Proposed Modification needs to be amended. - Amend Proposed Modification MM22 line 2 to read:- ".. effects on the Listed Building to the west of the site"	The Council confirms the Historic England are correct that there is only one listed building within the proximity of Site WM4, and thus the recommended modification shall be put forward.	".. effects on the ~~two~~ Listed Building~~s~~ to the west of the site"

MM23				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM24				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM25				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0085	Andrew Docherty	The Proposed Main Modifications are inconsistent. MM25 is proposed to be added to Site MW5 requirements – whereas no such requirement is to be added in respect of Proposed Site MW3 (and others) – this, despite the Sustainability Appraisal Report (Ps 1 and 95) stating respectively re Site MW3 (formerly 78): that 'Site 78 may not be suitable for a waste management use which uses combustion processes' and that 'the site is likely to produce dust and noise, plus emissions of NOx and CO2 to the air.' Bearing in mind that Proposed Policy WDM 2 states that schemes 'will be permitted…' subject to certain assessments, it is essential that any adverse impacts are fully investigated before planning permission is granted – it is too late once planning permission has	The Council are of the opinion that MM25 is not required, and it is therefore proposed for deletion. The existing allocations statement wording, in combination with the policies of the DPD, is considered adequate to ensure detrimental impacts upon sensitive receptors are avoided and consistent with the rest of the Plan.	**Deletion of MM25**

MM25				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		been granted. Appropriate Modifications should be introduced to ensure that site designations in the Waste Management DPD are made subject to full assessments of air quality and noise impacts on sensitive receptors before planning permission is granted.		

MM26				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM27				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM28				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0041	Ian Smith Historic England	MM28 Site WM6 – Sound subject to a factual correction The nearest Listed Building to this area is the Grade II Listed main office building to the premises occupied by Tanks and Drums Ltd, 175 metres or so to the west of this site on Bowling Back Lane. There are no other Listed Buildings to the west of this site likely to be affected by the redevelopment of this area (the next nearest is on Wakefield Road over 600 metres away). Therefore whilst we	The Council confirms the Historic England are correct that there is only one listed building within the proximity of Site WM6, and thus the recommended	".. effects on the ~~two~~ Listed Building~~s~~ to the west of the site"

MM28				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		welcome the proposed Modification (which will alert all those dealing with proposals for this site of the presence of this designated heritage asset and help to ensure that any redevelopment takes place in a manner which conserves those elements which contribute to its significance) the Proposed Modification needs to be amended. Amend Proposed Modification MM22 line 2 to read:- ".. effects on the Listed Building to the west of the site"	modification shall be put forward.	

MM29				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM30				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM31				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM32				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM33				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM34				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM35				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0041	Ian Smith Historic England	MM35 Policy WDM2 (d) - Unsound. The Glossary to the NPPF makes it clear that, in terms of the historic environment, "conservation" is the process of managing change to ta heritage asset in a way which sustains and "where appropriate" enhances its significance Policy Therefore, in terms of the historic environment, enhancement should only be pursued where it is appropriate in order to better reveal the significance of that particular asset. WDM2 (d) amend to read:- "and, where possible and appropriate, enhancements made"	The Council is of the opinion the enhancement of the Historic Environment should only be made where appropriate and thus the recommended modification shall be put forward.	"and**,** where possible **and appropriate,** enhances the District's environmental assets"

MM36				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM37				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM38				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM39				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM40				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM41				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	**<u>MM41- WDM4:</u> (Positively Prepared – unsound)** Also, the following questions need to be asked in relation to the	Policy WDM4 will be applied to applications for	No action taken.

MM41				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		proposed development on site WM3: • Will recycled and secondary materials be used in construction of the development? • During construction, how will waste be minimised? • How will the applicant minimise the effects on the environment, noise, dust, water, air pollution and human health during construction? • Is the design energy efficient? • Does it maximise electricity generation from waste recovery and treatment of wastes? • What provision will be in place for other renewable energy sources, including opportunities to contribute to climate change mitigation? • Is pumping surface water into the River Aire a sustainable drainage measure? • What guarantee is there that waste to be treated cannot practically and reasonably be reused, recycled or processed to recover materials? • What appropriate management arrangements are in place for waste generated by the development? • How does the development reduce gases associated with	all waste management facilities. Any development proposal's compliance with Policy WDM4 will be assessed at the application stage.	

MM41				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		adverse climate change?		

MM42				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM43				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	• At this moment in time Bradford doesn't have the "appropriate facilities" to deal with the increasing commercial and industrial waste that will arise in the area. But the greatest need for this waste stream after "prevention" is recycling and not "Other Recovery" (EFW incineration). The existing capacity gap for recycling commercial and industrial waste (plus LACW) is 444,225 tonnes which, is significantly greater than Energy Recovery at 102,346 tonnes. Only 1 new additional EFW facility would be required over the lifetime of the plan, whereas 4 new additional recycling facilities would be needed by 2030 due to the forecast waste arising being 572,863 (capacity	The Council's waste management hierarchy prioritises opportunities for the management of waste to be firstly prevented, reused and then recycled before 'other recovery'. For the Plan to be Effective, it must demonstrate sufficient flexibility to encourage delivery and allow for changes in circumstances. Allowing the widest range	No action taken.

MM43				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		requirements). Also, the Waste DPD Site Requirements Study allocated 6 suitable sites and all these 6 have been identified as having the potential to accommodate Conventional Energy from Waste and advanced thermal treatment facilities. Several of these sites (including site WM3) have also been identified as having potential to accommodate more than one type of waste management facility e.g. enclosed recycling plant etc. Taking these facts into consideration the planned building of a C&I Energy from Waste facility on site WM3 will not have a significant impact on the growth and waste needs for C&I waste within the Bradford Community and another type of waste management facility would be more beneficial! The Energy from Waste Facility (RDF incinerator) and plastic melting plant (fractional depolymerisation/hydrous-pyrolysis) that are planned for Site WM3 will not protect or enhance the district's environmental assets or safeguard human health and are contrary to the **SA4 objective: "Safeguard and improve air, water and soil resources and**	of waste management technologies on sites allows the Plan to be flexible enough to adapt to any future changes and will encourage the delivery of waste management infrastructure. The Sustainability Appraisal has identified Site WM3 as having a neutral impact upon Objective SA4. The Council considers the issues raised within this representation are	

MM43				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		reduce the number of people affected by noise and dust from waste management sites" due to: • being in a prominent location on a narrow valley bottom, • frequent weather inversions, • the size, mass, volume and industrial façade being out of character to its surroundings, • its emissions from the 80 metre (262.46 ft.) plume could contribute to acid deposits on the South Pennine Moors SPA/SAC (locally called Rombald's Moor), • increased air pollution, including traffic fumes • pumping surface water from the facility into the River Aire, • close proximity to Heritage Asset, Grade 1 listed building East Riddlesden Hall/Grounds. • top of the 60 metre (196.85 ft.) stack being almost level with residential properties on the valley sides, • the vast radius of emission disposal, • production of dust and noise, plus emissions of NOx and CO2 into the air.	currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment. It should also be noted that operators of proposed waste management facilities also need to apply for an	

MM43				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
			Environmental Permit, which will assess the emission from the facility.	
0041	Ian Smith Historic England	MM43 Objective 3 - Unsound The Glossary to the NPPF makes it clear that, in terms of the historic environment, "conservation" is the process of managing change to ta heritage asset in a way which sustains and "where appropriate" enhances its significance. Therefore, in terms of the historic environment, enhancement should only be pursued where it is appropriate in order to better reveal the significance of that particular asset. Objective 3 amend to read:- "and, where appropriate, enhances the District's environmental assets"	The Council is of the opinion the enhancement of the Historic Environment should only be made where appropriate and thus the recommended modification shall be put forward.	"and**, where appropriate,** enhances the District's environmental assets"

MM44				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	**MM44 Objective 5: (Positively Prepared, Effective, Justified & Consistent with National Policy NPPF/NPPW - unsound)** • I understand that BMDC need to consider working in collaboration with other appropriate local authorities and waste industry operators to ensure that sub-regional waste issues are effectively planned for in the Waste Management Development Plan and that they have a duty to co-operate in accordance with this plan. Consideration must also be made for cross boundary issues including the	To ensure the Plan is Positively Prepared and Effective, the Council must work collaboratively with neighbouring authorities, and allows for the preparation of coherent planning strategies across the sub-region.	No action taken.

MM44				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		movement of waste to appropriate facilities. If collaboration with other local authorities is to be executed and sub-regional waste transported to Site WM3 then I feel that modification MM44, Objective 5 is unjustified. This could lead to longer journeys for the HGV's and exasperating an already critical situation (traffic congestion/air pollution), which doesn't meet objectives **SA9 and SA3**. The other concern would be that if the EFW facility on site WM3 needs to rely on C&I waste from other local authorities then this contradicts modification **MM1**.		

MM45				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM46				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

MM47				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**

MM47				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		NO REPRESENTATIONS RECEIVED		

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
0036	Beverley Eastell	**SA4: "Safeguard and improve air, water and soil resources and reduce the number of people affected by noise and dust from waste management sites". (Positively Prepared & Consistent with National Policy NNPF/NNPW - unsound)** • Objective SA4 states that the A650 "may act as a physical barrier, preventing any runoff from the site entering the River Aire". This would be a positive point if only this was the case. Yorkshire Water deem the discharge of onsite surface water into the combined sewers unacceptable, so this means that the surface water will be collected before being pumped into the River Aire! To do this the developers plan to take the pipework under the Aire valley Road (another cause for major disruption) along a lane next to Marley Activity Centre and then discharge it into the river. This could lead to severe environmental issues due to possible contaminants getting into the watercourse. Not to mention pumping directly into the part of the River Aire that clearly floods (Boxing Day 2015 for example). If you consider the extra volume of water that will be discharged,	The comment raised in this part of the representation appears to specifically relate to the details of the planning application on Site WM3, and thus will not be addressed further in the Statement of Consultation.	No action taken.

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		then the burden on the flood defences will be unmeasurable and frequent flooding will arise in this locality and further downstream! • Redevelopment of this site to facilitate an EFW facility (RDF incinerator) and a Plastic Melting Plant (fractional depolymerisation/hydro-pyrolysis) will produce dust and noise, plus emissions of NOx and CO2 from the stack into the air. It states in objective SA4 that "No residential receptors are located nearby but the Croft (a residential hamlet including a nursing home) are directly behind the proposed site. Also, there are residential properties on the other side of the gasometers (to the West). Plus, the residents of Riddlesden, East Morton, Thwaites and Long Lee are higher receptors surrounding the site. The negative impact on air quality will be almost impossible to keep to a minimum through assessment or mitigation. **SA5: "To conserve, restore, expand and enhance the internationally, nationally and locally valued wildlife species and habitats". (Positively Prepared & Consistent with National Policy NPPF/NPPW - unsound)** • There may be no nature conservation designations on site WM3 but the Aire Valley is home to various species of wildlife. Throughout the year, deer are often seen very close to the site or seen wandering the hillsides. Many species of birds fly over the said site on their journey through the valley, some on their migration to the two	The Council considers the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3 (Formerly Site 78) (including the proposed modifications). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that	

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		Wildlife sites that are within 1km of the proposed development. To build Waste Management Facilities that use incineration and pyrolysis/gasification processes on the allocated site will have an irreversible effect to the natural habitats of these locally valued species. • **Please see above <u>Modification MM20 - Site WM3.</u>** **SA7: To maintain, restore and enhance the character, value and diversity of natural and man-made landscapes. (Positively Prepared & Consistent with National Policy NNPF/NPPW - unsound)** • The height, mass and industrial façade of the proposed development are totally out of character with this locality and will have a detrimental effect on the landscape. Redevelopment of this site for waste management would affect receptors to the South (Thwaites/Long Lee) and the North (Riddlesden/East Morton). The impact will be immense, even if visual and landscape mitigation measures are implemented. **SA10: Encourage a modal shift away from road freight. (Effective**	any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment. The comment raised in this part of the representation appears to specifically relate to the details of the planning application on Site WM3, and thus will not be addressed further in the Statement of Consultation. See Response to MM5. The Council have review	

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		& Positively Prepared - unsound) • **Please see above <u>Modification MM5 Policy W1.</u>** **SA11: Improve the quality of the built environment, protect and enhance historic assets and make efficient use of land. (Positively Prepared & Consistent with National Policy NNPF/NNPW - unsound)** • My understanding is that the site is brownfield and lies within the Keighley urban area, not a greenfield site that lies within the Bradford urban area like stated in the Sustainability Appraisal Addendum Assessment Matrices. Also, the listed building stated is a Grade 1 listed building not a Grade 2 listed building like mentioned in the site summary. As you can appreciate, Grade 1 listed buildings are of exceptional interest and have more historical significance than a Grade 2 listed building so much so that only 25% of listed buildings are Grade 1. It is also not situated on the other side of the A606 Motorway but situated on the other side of the A650 Aire Valley Trunk Road. **SA12: Avoid, protect and enhance historic assets. (Consistent with National Policy NNPF/NNPW - unsound)** • East Riddlesden Hall, a Grade 1 listed building (see above) is situated across the A650 Aire Valley Trunk Road, it may not be within 250m of the site but it is less than 500m	the Sustainability Appraisal (SA) in light of the comments raised, and reissued the document with an Erratum Sheet inserted cover the changes made to address these issues. The Council are of the opinion the amendments made to the SA do not result in a material change to the results of the Sustainability Appraisal; therefore, the recommendations put forward are still valid.	

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		away. Due to the vast scale of the proposed development and the visual prominence of the site, there is a great risk of negative visual impact on East Riddlesden Hall. There may also be a risk of erosion to the aged stonework due to the increase of pollution from the extra HGV's and stack emissions. East Riddlesden hall should be protected against heritage harm but I feel that such harm will be caused to this historically significant building and its setting if incineration and pyrolysis/gasification facilities are to be built! The potential for redevelopment to improve the quality of the site is achievable but an EFW facility isn't the way forward. **SA15: Avoid impacts on open space, cultural, leisure and recreation opportunities: (positively Prepared – unsound)** This objective states that the site is within "the Bradford urban area yet objective SA4 states that it is "located at the edge of an industrial sector of the Keighley urban area" (the latter being correct). Also, mentioned before, the site is situated near the A650 Aire Valley Trunk Road and not the A606 motorway. This objective also states that **"No sensitive receptors within the immediate vicinity have been identified".** Yet Marley Activity Centre/King George V Playing Fields (bylaw protected) are directly opposite the site (across the A650). People from all walks of life, throughout the seasons, use this centre and enjoy its open space. It is also the setting for Keighley's Annual Agricultural Show and other organised		

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		events. So why hasn't this been identified as a sensitive receptor? If the planned EFW facility goes ahead then this will have a negative effect on this leisure and recreation facility and the wider community. I believe the grading of "neutral" effect should be reconsidered and graded negative instead!		
0083	Ros Brown	1. I do not consider this plan to be 'legally compliant' as the volume and complexity of the documents and grounds for representation and associated forms have not been made sufficiently accessible to the members of the public affected by the development of site WM3. Arguably they have not been effectively consulted as per Bradford's Statement of Community Involvement, 2008. In the light of this it is not acceptable for there to be a question mark in SA7 of the Addendum to Sustainability Appraisal Report - Assessment Matrices. 2. The 'legal compliance', thoroughness and reliability of this Plan is also called into serious question by the heading on P3 of the Modifications SA Addendum document where it refers to the 'Cambridge Local Plan' instead of the Bradford Local Plan. How many other errors are there in the Plan which have slipped in	The Council is of the opinion the public consultation has been carried out in conformity with Regulation 18 and 19 of the Town and Country Planning Regulations (2012) and the Council's Statement of Community Involvement (SCI). Copies of the Statement of Consultation for each stage of production can be found of the Council's website. This is a typographical error and will be corrected.	No action taken.

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		unnoticed with long-lasting consequences for the District? 3. I consider this plan to be unsound in that it has not been 'Positively Prepared' with regard to sustainable development and objective assessments and to this extent cannot be said to be 'Justified' or 'Consistent with National Policy' as there are other alternatives regarding the development of Site WM3 which would support sustainable development in accordance with NPPF and specifically NPPW policies (Sections 5 and 7). This is for the following reasons. The reference in SA6 of the Assessment Matrices regarding site WM3 states "It is unlikely that the redevelopment of this site will contribute to the achievement of BAP targets, unless, through ecological assessment, it was identified that the site contains BAP resources which could be enhanced through the development. The plan has been strengthened to include the requirement for consideration of potential impacts on the river corridor (the SAP and/or SAC) through a project level Appropriate Assessment (AA) if it is determined by an appropriate body that such an assessment is required. No opportunity for enhancement of biodiversity has been identified; therefore a neutral impact is defined." This does not take into account that such a project level AA was undertaken following inadequate information regarding the site in	The Council have consulted on number of long and short listed sites through the production of the Waste Management DPD, with the Site Assessment Report detailing the consideration and assessment of alternative sites. The Council has taken account of the HRA Assessment of Site WM3 in the production of the Waste Management and are of the opinion the issues raised within this representation are currently covered under 'Mitigation Measures' within the Site Allocation Statement for Site WM3	

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		the June 2012 Habitats Regulation Assessment and reported in the following HRA (November, 2012: Para 6.2). The report's conclusions are as follows regarding Site WM3 (Former Site 78). 'In conclusion, the findings of this air quality modelling exercise suggest that although the addition of the emissions from a combustion based waste facility would be relatively small, acid deposition is already in excess of the critical load for this part of the South Pennine Moors SPA/SAC (Rombald's Moor) and therefore a combustion based waste management use on proposed Site 78 of the Bradford Waste Management DPD would potentially exacerbate an existing situation. *With regards to impact avoidance measures, it is therefore suggested that proposed Site 78 of the Bradford Waste Management DPD may not be suitable for a waste management use which uses combustion processes and it is recommended that the Bradford Waste Management DPD is amended to reflect that this use should not be identified as being suitable for Site 78.* (Para 6.2) 1. To make this plan 'legally compliant' an adequate and accessible consultation should be undertaken with local residents and users/managers of heritage and SPA/SAC sites to minimise the uncertainty relating to Sustainability Appraisal Objective SA7. 2. To make this plan 'legally compliant' the Modifications SA Addendum document and the Waste Management DPD should be thoroughly checked and corrected to ensure it reflects the Bradford and not Cambridge Local Plan. 3. To make this plan 'sound' the Sustainability Appraisal Objectives	(Formerly Site 78) (including the proposed modifications). This is further reinforced through Policy WDM2 which stipulates all Proposals for all waste management facilities (whether new, expanded but excluding landfill schemes) will be permitted provided that it can be demonstrated that any impacts of development will not significantly adversely affect people, land, infrastructure, natural resources and the historic environment.	

SUSTAINABILITY APPRAISAL				
Rep ID	**Name / Organisation**	**Summary of Representation**	**Council Response**	**Action(s) Required**
		SA4, SA5, SA6, SA11, SA12 and SA15 must all be updated to reflect the HRA (November, 2012) conclusions that this site is not suitable for combustion based waste management. These should now be shown in red as 'Significant Negative's. 4. To make this plan 'sound' MM20 should now be updated to reflect the project level AA and read 'The potential effects of a Conventional Energy from Waste Facility and Advanced Thermal Treatment on the SAP and/or SAC have been assessed through a project level Appropriate Assessment (AA) and the Bradford Waste Management DPD has been amended to reflect that this use should not be identified as being suitable for Site WM3.'		

Appendix 1 – Email and Notification Letter

Department of Place
Development Plans
4th Floor Britannia House
Hall Ings
Bradford
BD1 1HX

Tel: (01274) 433679
Email: planning.policy@bradford.gov.uk

Date: Wednesday 15th February 2017

Dear Sir / Madam,

LOCAL PLAN FOR THE BRADFORD DISTRICT

- **Waste Management Development Plan Document**

- Proposed Modifications (REGULATION 18 & 19)

I am writing to you as a statutory consultee or because of your previous interest in the Local Plan for the Bradford District. Following consultation on the Waste Management DPD Publication Draft the Council submitted the DPD to the Secretary of State on Monday 16th May, for examination in public by an independent Planning Inspector. The Secretary of State then appointed Mr Stephen Pratt BA (Hons) MRTPI to undertake the examination into the Waste Management DPD.

As part of the examination process a number of modifications to the Plan are now being proposed, which have been set out in the Schedule of Modifications available on the Councils website.

Aim of this consultation
As required under the Town and Country Planning Regulations 2012, the Council must now undertake a 6 week public consultation on the Schedule of Modifications.

Alongside the Schedule of Modifications, the Sustainability Appraisal Addendum will be published, which will detail the potential impacts of the modified policies.

It is important to point out at this stage that representations on the Modifications must relate to test of soundness (Positively Prepared, Justified, Effective and Consistent with national policy).

Following the close of the public consultation, the Council will produce a Statement of Consultation detailing what was undertaken, the responses received and a Council response to each representation.

The Council is keen to promote the submission of comments electronically and would encourage anyone with appropriate facilities such as email to make their responses in this way. Representations can be made using the Representation Form available online at www.bradford.gov.uk/planningpolicy or by email to the address planning.policy@bradford.gov.uk

As well as electronic representations the Council will also accept responses by post to Development Plans, City of Bradford Metropolitan District Council, 4th Floor, Britannia House, Hall Ings, Bradford BD1 1HX.

All comments should be with the Council by 3pm on Wednesday 29th March 2017.

Your personal details and comments cannot be kept confidential and will be published and submitted to the Secretary of State alongside each of the proposed modifications for public examination by an independent Planning Inspector.

Availability of Documents

All three development plans and supporting documents will be available to view on the Council's website at: www.bradford.gov.uk/planningpolicy.

Reference copies of each Development Plan Document together with the supporting documents listed will be available for inspection at the deposit locations listed below:

Development Plan Documents

- **Waste Management Development Plan - Schedule of Modifications**

Supporting Documents

Sustainability Appraisal Addendum
Statement of Representations

Deposit Locations

- **CBMDC Office: Britannia House Reception, Bradford, BD1 1HX.**
- **CBMDC libraries: Bradford Local Studies Library, Bradford City Library, Shipley, Bingley, Keighley and Ilkley.**
- **Town Halls & One Stop Shops: Keighley and *Ilkley *(*By appointment only).***

Should you have any further queries about the Development Plan Documents consultation process please contact a member of the Development Plans team by E-mail on planning.policy@bradford.gov.uk or telephone (01274) 433679.

Yours faithfully,

A Marshall

Andrew Marshall
Planning & Transport Strategy Manager

Appendix 2 - List of Media and Press Releases relating to the Consultation

The council issued a press released in February 2017 (below), inviting interested parties to comment on the modifications to the Waste Management DPD.

Have your say on the waste plan

Consultation has begun on modifications to the planning strategy into how the Bradford district will manage its waste for the next 15 years.

People have until March 29 to have their say on the Waste Management Development Plan.

When the consultation ends, an independent planning inspector will take account of representations before deciding if the plan is legally compliant.

If and when the inspector passes the plan it can be formerly adopted by the Council's Executive and then the Full Council.

This will form part of the Council's Local Plan which is the planning blueprint for the district.

News Article – Telegraph and Argus – 10th February 2017

PLANS to allocate six new waste sites for the district will need to be tweaked, a Government inspector has ruled.

Bradford Council wants the district to make a "step-change in the way it manages its waste" by 2030 by dealing with its own rubbish instead of sending it to other parts of the UK and Europe.

But to do this, it needs to find 17 hectares of land for new waste facilities and has put together a document called the Bradford Waste Management Development Plan, setting out five suggested sites in Bradford and one in Keighley.

Work has already begun on the latter site - the former gas works at Marley - where the company Endless Energy is building a controversial £135m energy-from-waste incinerator.

On Thursday, protesters gathered outside City Hall waving placards as the firm was given planning approval for a different design for its plant. A petition against the development also attracted 5,000 signatures.

The other proposed sites are:

- Vacant site, Princeroyd Way, Listerhills, Bradford - Existing skip hire depot, Ripley Road, Bowling, Bradford,
- Existing household waste site, Bowling Back Lane, East Bowling, Bradford,
- Vacant site, Merrydale Road, Euroway Estate, Bradford,
- Existing scrapyard, Birkshall Lane, East Bowling, Bradford,

The sites could variously be used to divert rubbish from landfill by methods such as recycling, incineration, reclamation or composting.

The plan notes that most of Bradford's waste is currently either sent to other districts for disposal or sent to Europe to be used as fuel, once recyclables are extracted.

It says: “The current lack of recycling, treatment and residual management facilities within the Bradford district is a key factor in why much of the waste arisings from the district is currently exported.”

The plan has been out to public consultation and has also been studied by planning inspector Stephen Pratt, who has now ruled that some adjustments will have to be made before the plan can be adopted.

The suggested tweaks are technical in nature, and make no change to the six proposed waste sites, but it means the plan will have to undergo another six-week public consultation.

The consultation will run from February 15 to March 29.

A Council spokesman said only people who had taken part in the first consultation could participate, and that they would be contacted.

CONSULATION has begun on modifications to the planning strategy into how Bradford will manage its waste for the next 15 years.

People have until March 29 to have their say on the changes to the Waste Management Development Plan.

When the consultation ends, an independent planning inspector will take account of representations before deciding if the plan is legally compliant.

If the inspector passes the plan, it can be adopted by the Council's executive and then the full Council. This will form part of the Council's Local Plan, the planning blueprint for the district.

Comments can be made via e-mail to planning.policy@bradford.gov.uk, or by post to Development Plans Group, 4th Floor Britannia House, Hall Ings, BD1 1HX.

Information is available on the Council's website and in various libraries and town halls across the district.

Have your say over waste plan

An artists' impression of the new Marley plant

2 days ago / Alistair Shand

PUBLIC consultation has begun into how Bradford district will manage its waste for the next 15 years.

The council needs to find 17 hectares of land for new facilities and has set out its intentions in the Waste Management Development Plan.

It details six suggested waste sites, including the former gasworks at Marley where Endless Energy has been given permission to build a controversial £135m energy-from-waste incinerator.

People have until March 29 to have their say on the changes.

Taking account of representations, an independent planning inspector will then decide if the document is legally compliant, before it goes before the council's executive and full council for formal adoption.

The plan notes that most of Bradford district's waste is currently either sent to other areas for disposal or to Europe to be used as fuel, once recyclables are extracted.

It says: "The current lack of recycling, treatment and residual management facilities within the Bradford district is a key factor in why much of the waste arising from the district is currently exported."

Copies of the consultation document can be viewed online at bradford.gov.uk and at Keighley Library.

Have your say over waste plan

An artists' impression of the new Marley plant

21 Feb 2017 / **Alistair Shand**

9 comments

PUBLIC consultation has begun into how Bradford district will manage its waste for the next 15 years.

The council needs to find 17 hectares of land for new facilities and has set out its intentions in the Waste Management Development Plan.

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Copies of the consultation document can be viewed online at bradford.gov.uk and at Keighley Library.

Comments can be e-mailed to planning.policy@bradford.gov.uk or posted to Development Plans Group, 4th Floor Britannia House, Hall Ings, Bradford BD1 1HX.

Appendix 3 - Summary of main issues raised through representations

General Comments
A number of objections received relating to site WM3 not specifically relating to any specific proposed main modification.
MM1
The representation objects to the use of energy from waste in the waste hierarchy and a general objection to site WM3.
MM2
A number of representations relating to amending the modifications to Objective 3, relating to enhancements only where appropriate and if enhancements cannot be achieved applications must be refused.
MM3
The representation objects to the use of energy from waste in the waste hierarchy and a general objection to site WM3.
MM4
NO REPRESENTATIONS RECEIVED
MM5
The representation relates to a site receiving a “significant positive effect” for alternative modes of transport.
MM6 – MM19
NO REPRESENTATIONS RECEIVED
MM20
The representations relate to objections to site WM3 on grounds of emissions, HGV movements, design, landscape impact, habitats, biodiversity etc.
MM21
The representations relate to objections to the application on site WM3 and a comment regarding the need to refuse any application on site WM3 if the contribution to the national grid and a wider
MM22
The representation relates to a factual correction to the modification to take account of

the fact there is only one listed building to the west of Site WM4, not two as stated in the modification.
MM23 & 24
NO REPRESENTATIONS RECEIVED
MM25
The representation relates to an objection to site WM3 on grounds of air quality and noise impacts.
MM26 & MM27
NO REPRESENTATIONS RECEIVED
MM28
The representation relates to a factual correction to the modification to take account of the fact there is only one listed building to the west of Site WM6, not two as stated in the modification.
MM29 - 34
NO REPRESENTATIONS RECEIVED
MM35
The representation relate to a soundness issues regarding enhancement to the built environment and the fact the NPPF stipulates these should only be made where appropriate; suggested amendment to modification to make sound.
MM36 – 40
NO REPRESENTATIONS RECEIVED
MM41
The representation relates to a number of questions to the development of a waste facility on site WM3.
MM42
NO REPRESENTATIONS RECEIVED
MM43
One representation objects to the use of energy from waste in the waste hierarchy and a general objection to site WM3. The other representation relates to a soundness issues regarding enhancement to the built environment and the fact the NPPF stipulates these

should only be made where appropriate; suggested amendment to modification to make sound
MM44
The representation relates to an objection to collaboration with other local authorities if it results in waste being transported to WM3 from the sub-region and is contrary to SA Objectives SA9 and SA3.
Sustainability Appraisal
The representations relate to objections to Site WM3 and how the Sustainability Appraisal is unsound.