

Local Development Framework for Bradford

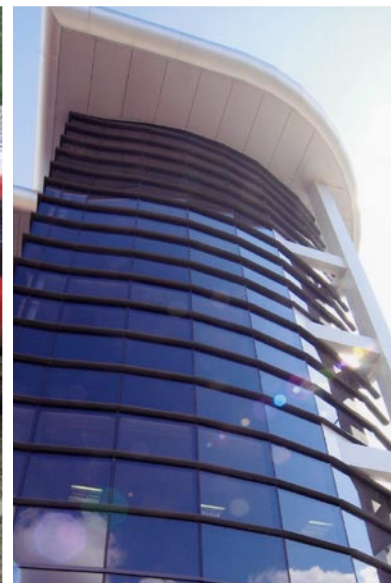
Core Strategy

Issues and Options

Summary of Representations

Topic paper 8: Waste Management

December 2007



City of Bradford MDC

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LIST OF CONSULTEES WHO SUBMITTED COMMENTS ON TOPIC PAPER 8:

1. Airedale Partnerships
2. Bedminster International
3. Bradford District Chamber of Trade
4. Bradford University
5. English Heritage
6. Environment Agency
7. Environmental Partnerships
8. Government Office for Yorkshire and Humber
9. Ilkley Civic Society
10. Ilkley Parish Council
11. RSPB
12. Sport England
13. United Co-Operatives Ltd
14. Wharfedale Friends of the Earth
15. Yorkshire Forward
16. Yorkshire and Humber Assembly

COMMENT	ORGANISATION
<p>GENERAL</p> <p>Section 3.2 suggests that all areas are going to have to contribute some sort of waste facility and that there are likely to be more, smaller facilities rather than the major disposal sites that have existed to date. In these circumstances, each region has to expect and therefore plan, that it will have to look after its own waste.</p>	<p>Bedminster International</p>
<p>The Environment Partnership identifies the promotion of and increase in recycling as a priority for the District and a key issue in tackling climate change. The Partnership has not however been involved in the detailed policy around waste management services and facilities and does not have any specific comments on the LDF waste management paper at this stage.</p>	<p>Environment Partnerships</p>
<p>As the development strategy for waste management is worked up it should utilise the data and information available on arisings, current capacity, any shortfalls having regard to any changes needed in the types of facilities in the light of Government policy (reducing dependence on landfill). It should inform and be informed by the Municipal Waste Management Strategy and set out policies and proposals with regard to RSS. These should cover what provision is required and how it will be made. They should ensure that there are sufficient opportunities for waste management facilities (including disposal) in appropriate locations. Priority should be given to 'brownfield' land. The strategy should therefore set out the preferred types of waste treatment facility and broad locations for them to provide guidance and direction for the more detailed policies and site allocations in the Waste DPD. The strategy will need to look forward at least 10 years from adoption of the Core Strategy or any longer time horizon specified in RSS Are there any cross-boundary issues?</p>	<p>Government Office for Yorkshire and Humber</p>
<p>Comment on mineral extraction, a subject covered in Topic Paper 7, is often linked with waste management. As such it is proposed this be addressed under Topic Paper 8 in the context of site restoration.</p> <p>It is consider restoration of existing and proposed mineral extraction sites should be based on a programme of works that are linked to other relevant strategies and policies e. g open space, sport and recreation which can in turn help guide: type of restoration, after use of sites, and timing of restoration in a planned manner as opposed to considering remediation on a site by site basis.</p>	<p>Sport England</p>

<p>The stepped change away from land fill is supported in principle. Allocation of landfill sites with a short-term life can also be accepted, subject to the above comments.</p>	
<p>Waste management is a key issue for all local authorities and the Council should seek to investigate all avenues of waste handling and collection. United Co-operatives keenly supports the minimisation of environmental impact, and sustainable energy production: all its existing stores and properties are now powered by renewable hydro-electricity and its logistics fleet is powered by bio-diesel. The Society supports the Council's aim (item 3.23) to promote and encourage the development of renewable energy resources.</p> <p>In addition to the above comments, consideration should be given to the threshold populations required to sustain specific local services, including local retail facilities. In communities where the immediate population is too small to support local shopping, permitting such facilities to locate on through roads, where they exist, so that they might draw on passing trade, may create a viable opportunity.</p>	<p>United Co-Operatives Ltd</p>
<p>Wharfedale Friends of the Earth agrees that Bradford should apply the waste hierarchy in its planning of waste management, i.e that first consideration be given to reduction of waste, followed by re-use, recycling and composting, incineration/energy recovery and finally landfill as a last resort. However, Friends of the Earth position on incineration is that this option tends to work against recycling and composting, since investment in an incinerator requires a commitment to supply it with large volumes of burnable waste. This tends to be from the waste streams most suitable for recycling. Recycling is more energy efficient than incineration, and does not pollute the air.</p> <p>Therefore, Friends of the Earth oppose any move to implement mass incineration of waste in Bradford, and suggest that other more environmentally friendly methods of waste disposal (recycling, composting) should be given full priority.</p> <p>Currently, Bradford recycles just over 20% of its waste, which an improvement on previous years. However, other UK local authorities in the country are recycling over 50% of their waste, which shows what can be achieved through good recycling strategies, marketing of recycling schemes and cooperation from residents and companies/organisations that generate waste. We note that Bradford's 2015 target of 33% of waste to be recycled or composted seems very unambitious compared with what some local authorities are already achieving in 2007. We suggest strongly that the targets should be raised to at least 50% of waste being recycled, perhaps as early as 2010. This could be achieved not only by increasing the volume of waste recycled, but also reducing the total amount of waste generated in the first place, so</p>	<p>Wharfedale Friends of the Earth</p>

<p>there is less non-recyclable waste to dispose of.</p> <p>Wharfedale Friends of the Earth support the proposition that Bradford should move towards self-sufficiency in waste management, moving the treatment of waste as close as possible to its source, and also minimising the generation of new waste. Concerning the role of the planning system in waste reduction/re-use, the proposals to reduce construction waste appear helpful.</p> <p>For re-use of construction waste, there could be more specific promotion of schemes such as Freecycle to residents in particular for waste from new or renovated buildings to be re-used elsewhere.</p> <p>Developers should be encouraged to go as far as possible in the re-use of waste in new buildings, both for outdoor and indoor materials. These uses could include insulation made of post-consumer paper waste, and plastic in interior fittings.</p> <p>Wharfedale FoE recommend that any future landfill site in the Bradford area is equipped for generation of electricity from landfill gas. This will help reduce the environmental impact of the landfill option by removing methane, a greenhouse gas at least six times more potent than carbon dioxide. We suggest that cooperation between local authorities in Yorkshire to share a limited space for landfill, can maintain pressure to use the more environmentally friendly options for waste disposal. We note that any waste management process is likely to have some impact on the local environment and recommend avoiding situation of waste management sites near SSSIs and other important wildlife habitats. We also suggest that the positioning of waste management sites should aim to reduce as much as possible the transport of waste, and that would normally mean a larger number of smaller sites in the Bradford area, rather than centralised facilities.</p>	
<p>The Assembly fully supports the utilisation of RSS figures in the Waste Management Topic Paper. It is suggested that reference be made to annually updated waste data as provided in the Yorkshire & Humber Regional Technical Advisory Body (RTAB) report. It is confirmed that the latest data formally published by the RTAB is found within the RSS Examination in Public Core Library Document “Revised Waste Data & Strategic Messages” (August 2006). The Assembly has put in to place mechanisms (via a regional concordat with the Environment Agency) to allow revised waste data to be issued on an annual basis from 2007 onwards.</p> <p>This document sets out more updated data and includes an analysis of a sub regional “capacity gap” for waste management facilities. In terms of West Yorkshire, the most significant strategic message is that the region has poor levels of provision for large scale composting, with almost 75% of current capacity</p>	<p>Yorkshire and Humber Assembly</p>

<p>located in the Humber sub region. West Yorkshire, despite generating the largest proportion of MSW, has only 5% of current capacity Paragraphs 3.1 to 3.17 Bradford Waste Management Topic Paper set out a very clear context for waste management in Bradford and there is a commendable commitment to manage waste in a more sustainable manner. However, the Assembly would suggest that the final Core Strategy makes a clear reference to the opportunities for a plan-monitor-manage based approach enabled by the annually RTAB Waste Data Report.</p>	
WASTE REDUCTION	
Q 8.1 HOW CAN THE WASTE DPD PROMOTE WASTE MINIMISATION AND REUSE?	
<p>Developers should be encouraged to outline how waste will be minimised in both the construction phase and when the development is in use.</p>	Airedale Partnership
<p>You correctly recommend innovation from developers in para 3.25, including smaller bin areas to promote less waste. In fact, segregation of recyclate demands more area as separate bins, boxes and the like become more prevalent</p>	Bedminster International
<p>We support all of the options [below] and <i>particularly a requirement that at planning application stage, developers be required to submit information describing how they will minimise resource use, maximise the use of recycled materials and minimise waste</i>, as our response to question 7.5 of topic paper 7 sets out. Policies and strategies should also include the local sourcing of materials.</p> <ul style="list-style-type: none"> • <i>1. Requiring/encouraging developers to undertake lean and modular construction design which realises materials</i> • <i>2. “Designing out” waste be selecting standard component sizes</i> • <i>3. Requiring/encouraging as part of any planning application the developer to outline how waste will be reduced (minimised) whilst the development is under construction</i> • <i>4. Requiring/encouraging developers to include innovative ideas in their proposals for waste reduction (minimisation) when the development is brought into use e.g. smaller bin areas</i> • <i>5. Requiring/encouraging developments to re-use products in construction which may be considered by others as waste e.g. using stone from a demolished building for construction of new development</i> • <i>6. Requiring/encouraging developers to include innovative ideas in their proposals for waste re-use after construction e.g. glass collection points for bottles that can be re-used (e.g. milk bottles)</i> 	Environment Agency

<p>Bullet 3 3. Requiring/encouraging as part of any planning application the developer to outline how waste will be reduced (minimised) whilst the development is under construction There are still vast opportunities for recycling. People need re educating about recycling.</p>	<p>Ilkley Civic Society</p>
<p>Bullet 2 and 4 2. “Designing out” waste be selecting standard component sizes 4. Requiring/encouraging developers to include innovative ideas in their proposals for waste reduction (minimisation) when the development is brought into use e.g. smaller bin areas</p>	<p>Ilkley Parish Council</p>
<p><u>We support the options developed</u> – in order to comply with policy ENV 4 of the draft RSS, the Council should prioritise the measures outlined in 3.26.</p>	<p>RSPB</p>
<p>Wharfedale Friends of the Earth support the proposition that Bradford should move towards self sufficiency in waste management, moving the treatment of waste as close as possible to its source, and also minimising the generation of new waste. Concerning the role of the planning system in waste reduction/re-use, the proposals to reduce construction waste appear helpful. For re-use of construction waste, there could be more specific promotion of schemes such as Freecycle to residents in particular for waste from new or renovated buildings to be re-used elsewhere. Developers should be encouraged to go as far as possible in the re-use of waste in new buildings, both for outdoor and indoor materials. These uses could include insulation made of post-consumer paper waste, and plastic in interior fittings.</p>	<p>Wharfedale Friends of the Earth</p>
<p>WASTE RECYCLING</p>	
<p>Q 8.2 HOW CAN THE WASTE DPD HELP ASSIST IN THE BRADFORD DISTRICT IN REACHING ITS RECYCLING TARGETS SET BY THE GOVERNMENT?</p>	
<p>We are supportive of Bradford Councils aims to increase our recycling targets, and as such we feel businesses should be encouraged to recycle more. We do however feel it is an ambitious hope for the local authority to expect business to foot the total bill for setting up schemes to dispose of business waste. As such we applaud and support the scheme set up via Bradford Council Markets section to provide facilities at St James Market for businesses to take in waste and feel this should be extended to other council facilities. We are sure that if businesses get used to taking trade waste (cardboard, packaging etc) to a common point where (hopefully) a free of charge disposal facility was available- the amounts recycled</p>	<p>Bradford and District Chamber of Trade</p>

<p>would increase- thus helping both sides. The council would be able to claim an increase in the tonnage collected/ recycled. (We would gladly create a link between our member businesses to identify both the need for such facilities and feedback on where they are best required/ necessary.</p>	
<p>As part of the approach for construction and demolition waste, there should be a commitment to encouraging, in the first instance, the <u>reuse of existing buildings</u> rather than simply allowing them to be demolished and their sites redeveloped.</p> <p>There might also be reference to the encouragement of the development of appropriate facilities for the reuse of demolition waste- particularly where these might help facilitate the repair of historic buildings</p>	<p>English Heritage</p>
<p><u>We support all of the options</u>, including consideration of new waste sites within the Core Strategy and Waste DPD as part of a sustainable and strategic strategy.</p>	<p>Environment Agency</p>
<p>Bullets 1 and 3.</p> <ol style="list-style-type: none"> 1. <i>Requiring/encouraging developers to re-use recycled products as part of the construction process – e.g. recycled glass, secondary aggregates (crushed construction and demolition waste), composting for landscaping.</i> 3. <i>To allocate more Civic Amenity sites in the Waste DPD to encourage recycling by the general public.</i> <p>There needs to be more collection points in residential areas.</p>	<p>Ilkley Civic Society</p>
<p>Bullets 1,2,3 and 4</p> <ol style="list-style-type: none"> 1. <i>Requiring/encouraging developers to re-use recycled products as part of the construction process – e.g. recycled glass, secondary aggregates (crushed construction and demolition waste), composting for landscaping.</i> 2. <i>Requiring/encouraging developers to include innovative ideas in their development proposals for waste recycling – e.g. specific areas in the development for composting, glass collection, paper collection.</i> 3. <i>To allocate more Civic Amenity sites in the Waste DPD to encourage recycling by the general public.</i> 4. <i>To allocate sites in the Waste DPD for the range of recycling uses e.g. paper recycling, glass recycling, aggregate recycling.</i> 	<p>Ilkley Parish Council</p>

<p><u>We support the options developed</u>, although we emphasise the need to ensure waste allocations are in sustainable locations where impacts on designated wildlife sites, flood risk/floodplain functionality and natural resources are minimised.</p>	<p>RSPB</p>
<p>We note that Bradford’s 2015 target of 33% of waste to be recycled or composted seems very unambitious compared with what some local authorities are already achieving in 2007. We suggest strongly that the targets should be raised to at least 50% of waste being recycled, perhaps as early as 2010. This could be achieved not only by increasing the volume of waste recycled, but also reducing the total amount of waste generated in the first place, so there is less non-recyclable waste to dispose of.</p> <p>For recycling, the LDF should maximise the availability of suitable sites as recycling centres, and increase the variety of materials that can be recycled at each site. Maximum use should be made of sites where residents visit regularly, e.g supermarkets and car parks.</p> <p>Recycling is more energy efficient than incineration, and does not pollute the air. Therefore, Friends of the Earth oppose any move to implement mass incineration of waste in Bradford, and suggest that other more environmentally friendly methods of waste disposal (recycling, composting) should be given full priority.</p> <p>However, Wharfedale FoE suggest that the most important way of encouraging residents to recycle is to improve the door-to-door collection, and here most resources should be targeted. As well as collection of metal, glass, paper, plastics and garden waste, provision should be made for central composting of food wastes, especially for those in high density housing who do not have the space to compost their own organic waste at home. Composting sites should be located in the Bradford area and the resulting compost should be used as much as possible in the Bradford area, for amenity and private use.</p>	<p>Wharfedale Friends of the Earth</p>
<p>It is important that <u>a hierarchy approach is promoted</u> to achieve national and regional waste management targets. We believe the core strategy could make a commitment towards delivering ‘waste to work’ projects to create jobs and growth through recycling and re-use’ to complement objective 5d) ii Regional Economic Strategy. We welcome the options to <i>encourage developers to use recycled products (content) in new developments</i>. The core strategy should include a ‘hook’ which allows for a policy within the waste DPD requiring developers to provide specific locations within developments to locate recycling bins and composting facilities</p>	<p>Yorkshire Forward</p>

<p>Paragraph 3.25, bullet #4 suggests “smaller bin areas” as a possible means of facilitating waste minimisation. This proposal is not supported as draft RSS makes it clear that more space will be required in layouts to allow for the segregation and recycling of different waste types in new development. Under paragraphs 3.26 various approaches for re-using waste in construction are discussed. The Assembly suggests that the <u>concept of waste audits for significant developments is promoted</u>, as outlined in Draft RSS. The text supporting Question 8.2 (Waste Recycling) could better distinguish between issues associated with the collection of materials for recycling and the utilisation of recyclates.</p>	<p>Yorkshire and Humber Assembly</p>
<p>WASTE ENERGY RECOVERY</p>	
<p>Q 8.3 WHAT ADDITIONAL WASTE MANAGEMENT FACILITIES ARE NEEDED FOR THE DIFFERENT TYPES OF WASTE THAT ARE PRODUCED IN THE BRADFORD DISTRICT?</p>	
<p>I fail to see how waste energy recovery (incineration) can be seen as sustainable as it requires the continuing production of waste for its operation. If we do manage to successfully reduce our waste and recycle to targets then the incineration plant may not be operating efficiently, which again makes it unsustainable. I cannot see how this fits in with an eco-city.</p>	<p>Bradford University</p>
<p>Again, we support all the options and the consideration being given for energy from waste sites. 1. Requiring developers, who propose energy from waste developments, to demonstrate that they have taken the waste hierarchy into account and re-used and recycled as much as possible before using the waste for energy production. 2. To allocate sites in the waste DPD for a range of waste facilities, including energy recovery. 3. To allocate sites in the waste DPD specifically for energy recovery 4. To work with adjoining authorities in the West Yorkshire sub region to ensure that sites are identified</p>	<p>Environment Agency</p>
<p>Bullets 1 and 4 1. Requiring developers, who propose energy from waste developments, to demonstrate that they have taken the waste hierarchy into account and re-used and recycled as much as possible before using the waste for energy production. 4. To work with adjoining authorities in the West Yorkshire sub region to ensure that sites are identified</p>	<p>Ilkley Civic Society</p>

Wharfedale Friends of the Earth agrees that Bradford <i>should apply the waste hierarchy</i> in its planning of waste management, i.e. that first consideration be given to reduction of waste, followed by re-use, recycling and composting, incineration/energy recovery and finally landfill as a last resort. However, Friends of the Earth position on incineration is that this option tends to work against recycling and composting, since investment in an incinerator requires a commitment to supply it with large volumes of burnable waste. This tends to be from the waste streams most suitable for recycling.	Wharfedale Friends of the Earth
Q 8.4 ARE THERE ANY TYPES OF WASTE FOR WHICH THERE ARE SUFFICIENT FACILITIES?	
Bullets 1 and 4 1. <i>Requiring developers, who propose energy from waste developments, to demonstrate that they have taken the waste hierarchy into account and re-used and recycled as much as possible before using the waste for energy production.</i> 4. <i>To work with adjoining authorities in the West Yorkshire sub region to ensure that sites are Identified</i>	Ilkley Civic Society
WASTE DISPOSAL	
Q8.5 IN WHICH AREAS OF THE BRADFORD DISTRICT SHOULD THESE WASTE MANAGEMENT FACILITIES BE LOCATED?	
<u>We support the options being considered</u> with the recognition of managing landfill waste in both the short and long term as other measures to manage waste are being brought online and take effect.	Environment Agency
Locally, but if close to residential areas they need to be carefully designed and landscaped as at Golden Butts Ilkley for example.	Ilkley Civic Society
Locally for ready use	Ilkley Parish Council
Wharfedale FoE recommend that any future landfill site in the Bradford area is equipped for generation of electricity from landfill gas. This will help reduce the environmental impact of the landfill option by removing methane, a greenhouse gas at least six times more potent than carbon dioxide. We suggest that cooperation between local authorities in Yorkshire to share a limited space for landfill, can maintain pressure to use the more environmentally friendly options for waste disposal.	Wharfedale Friends of the Earth

<p>We note that any waste management process is likely to have some impact on the local environment and recommend avoiding situation of waste management sites near SSSIs and other important wildlife habitats. We also suggest that the positioning of waste management sites should aim to reduce as much as possible the transport of waste, and that would normally mean a larger number of smaller sites in the Bradford area, rather than centralised facilities.</p>	
<p>Q 8.6 SHOULD WE IDENTIFY THE MAJOR WASTE FACILITIES THAT MAY BE REQUIRED AND ALLOCATE SITES FOR THESE?</p>	
<p><u>We support the options being considered</u> with the recognition of managing landfill waste in both the short and long term as other measures to manage waste are being brought online and take effect.</p>	<p>Environment Agency</p>
<p>Yes</p>	<p>Ilkley Civic Society</p>
<p>Yes</p>	<p>Ilkley Parish Council</p>
<p>Q 8.7 SHOULD WE HAVE A SITE SELECTION CRITERIA AS WELL AS IDENTIFYING THE MAJOR WASTE FACILITIES?</p>	
<p><u>We support the options being considered</u> with the recognition of managing landfill waste in both the short and long term as other measures to manage waste are being brought online and take effect.</p>	<p>Environment Agency</p>
<p>Yes</p>	<p>Ilkley Civic Society</p>
<p>Yes</p>	<p>Ilkley Parish Council</p>
<p>The Assembly would strongly suggest that the Bradford LDF adopts an approach based on -Specific sites allocated to facilitate a network of strategic sites – for example to accommodate waste treatment facilities, major transfer stations and landfill. These should be capable of delivering the Bradford Waste Management Strategy, and should (ideally) be of sufficient size to allow for the co-management of waste streams other than MSW. 9 A robust criteria approach to the delivery of a larger number of smaller or community based facilities (e.g. local composting or bring sites).</p> <p>Paragraph 3.33 raises three options for the provision of sites for waste treatment facilities. It is suggested that the Core Strategy will need to recognise that for industrial & commercial (I&C) and hazardous wastes,</p>	<p>Yorkshire and Humber Assembly</p>

<p>there may be advantages in accommodating facilities which handle wastes from an area greater than the Bradford District. I&C and hazardous waste arising are made up of a number of specific waste sub-streams; it will not always be practical, or indeed the most sustainable solution, to process all of these wastes within one district. On this basis, it may necessary to consider a specific amendment to the “Vision” (Page 4) in relation to the cross boundary movements of specific waste streams.</p>	
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