

Our Ref: 40-b/Planning Delivery/Bradford/Local Development Frameworks/Bradford Waste Management  
Issues and Options Jan 10

25 January 2010

Bradford Local Development Framework  
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Dear Sir/Madame

### **Bradford Waste Management Issues and Options Consultation**

The Regional Planning Body (RPB) welcomes the opportunity to comment on the Bradford Waste Management Issues and Options Consultation document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the RPB's response to the consultation document is a set of comments aimed at highlighting where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal RPB view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

The following comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008. The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Through more sustainable waste management, moving the management of waste up the 'waste hierarchy' of reduction, reuse, recycling and composting, using waste as a source of energy, and only disposing waste as a last resort the Government aims to break the link between economic growth and the environmental impact of waste. National policy recognises the need for a 'step change' in the way we manage waste and the RSS (2008) provides policy support to local authority's in the region making strategic changes to the way they manage waste generated within their areas.

Delivering economic growth with sustainable waste management will be one of the key challenges to be delivered by Bradford's emerging Development Plan under the new LDF.

### **Key Points on the Issues and Options**

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict. The RSS (2008) has an important role in providing a strategic policy context for local policies. Therefore the need for there to be 'general conformity' between the RSS and the Development Plan Document should be explained at the start of this document.

The RPB welcomes references made throughout the document to RSS (May 2008) and welcomes the regional planning policy context that is set out throughout the document.

Overall, this consultation paper is comprehensive in that it identifies the key issues facing the area. I am pleased to note the document sets out the RSS (2008) objectives and policies in relation to waste management.

I note one objective for the future includes the need for cross-boundary working. Consultations have been made with neighbouring authorities and this has identified that formal joint-working on waste management matters are not possible (although there is joint PFI process underway for managing MSW with Calderdale). Where there are constraints to self sufficiency in managing waste, joint working is encouraged. This will be particularly valuable over time when monitoring and reviewing the Plan and may prove essential as we move towards the replacement of the RSS (2008) by an Integrated Regional Strategy.

Current waste management puts significant reliance on the export of waste to landfill outside the District. I welcome the priority objective to reverse this position and Bradford looks to be self-sufficient in managing its waste. I also welcome the acknowledgement there is a need for new waste infrastructure within Bradford and this supports the RSS (2008) forecasted new infrastructure requirements.

The document uses forecasts of waste arisings taken from RSS (2008), supplemented by the most recent GO update but asks if alternative waste forecasts would be more realistic. If forecast data from the RSS (or the most recent updates) is not used, the approach must be based on a robust and up to date evidence base.

The document notes the number of large and small sites to be identified should be maximised to provide flexibility and choice. This approach is supported and is in line with guidance to provide sufficient capacity by allowing for the loss of some potential sites.

I trust that the comments provided here are helpful as you move to the Preferred Options stage. It is important that this DPD is in general conformity with the RSS (2008). Clearly we wish to see the Waste Management DPD developing in general conformity with the Regional Spatial Strategy. If you have any queries about this response, please contact Paul Hatherley, e-mail: [paul.i.hatherley@btinternet.com](mailto:paul.i.hatherley@btinternet.com)

Yours sincerely

Mat' - Elliot

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**Please note:** from 1 April 2009 officers supporting the work of the Joint Regional Board, the new Regional Planning Body, will work in LGYH; please amend your contact databases accordingly.