

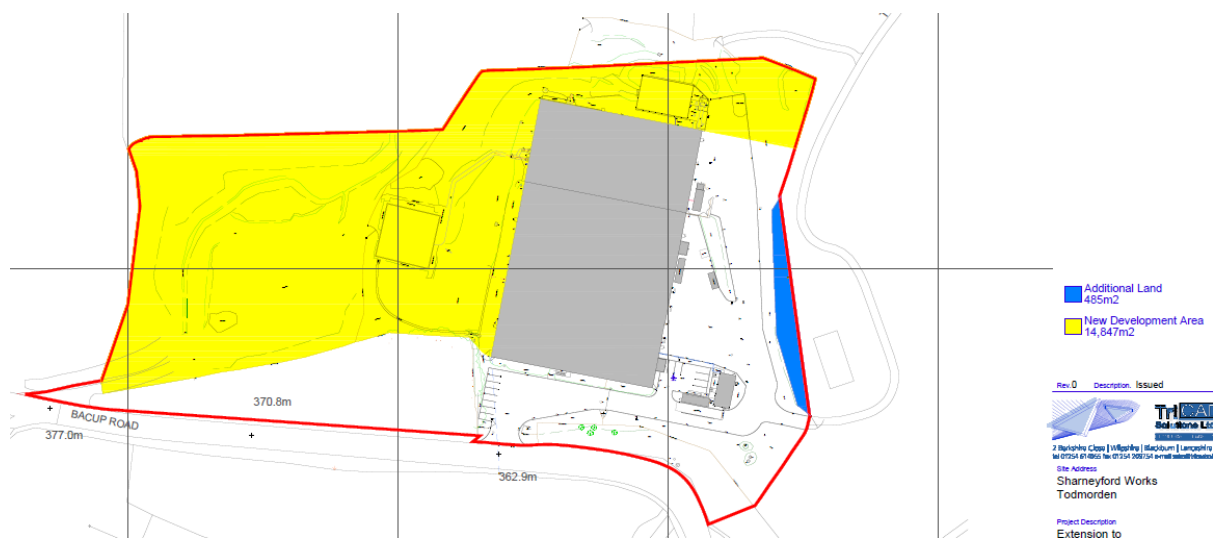
Calderdale Council Local Plan Examination

Response to stage 2 hearings - Waste matters

1. Developable Areas

- 1.1 During the stage 2 hearings into the Waste matters, the inspector requested clarification on the developable areas of the proposed waste site allocations, specifically sites at Sharneyford (WLP1) Swalesmoor (WLP2).
- 1.2 The agent acting on behalf of the Sharneyford site submitted additional information in respect of the developable area for this site. This additional information highlighted on plan reference TRI-3238-01 (extract below) establishes that the developable area in respect of allocation WLP1 is 1.48ha.
- 1.3 The existing WLP1 allocation assumed an area of 3.15ha although this included the existing buildings.

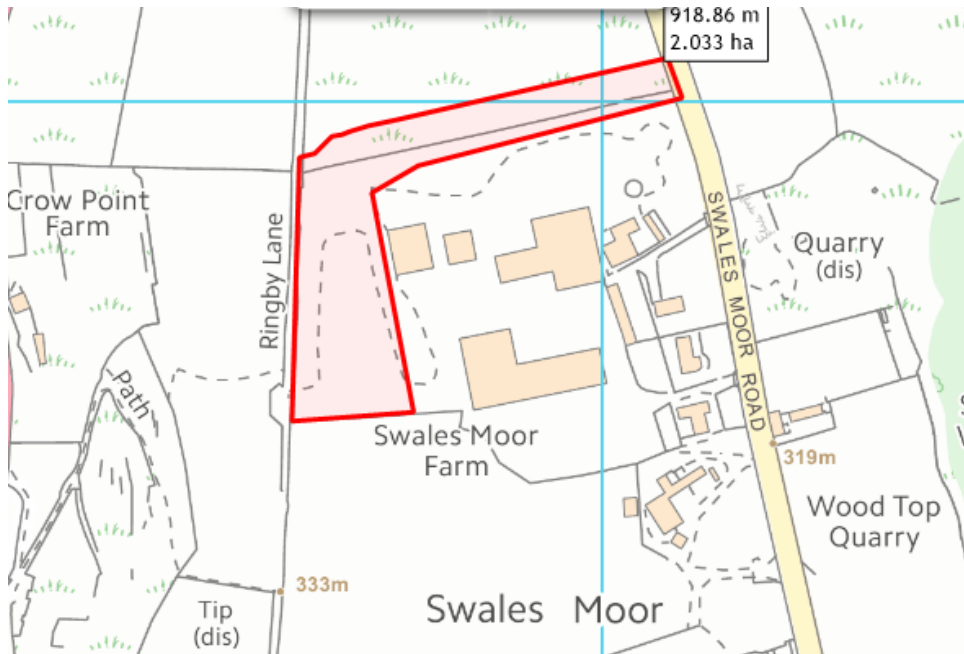
Map 1 – Updated Developable Area – Sharneyford Site (WLP1)



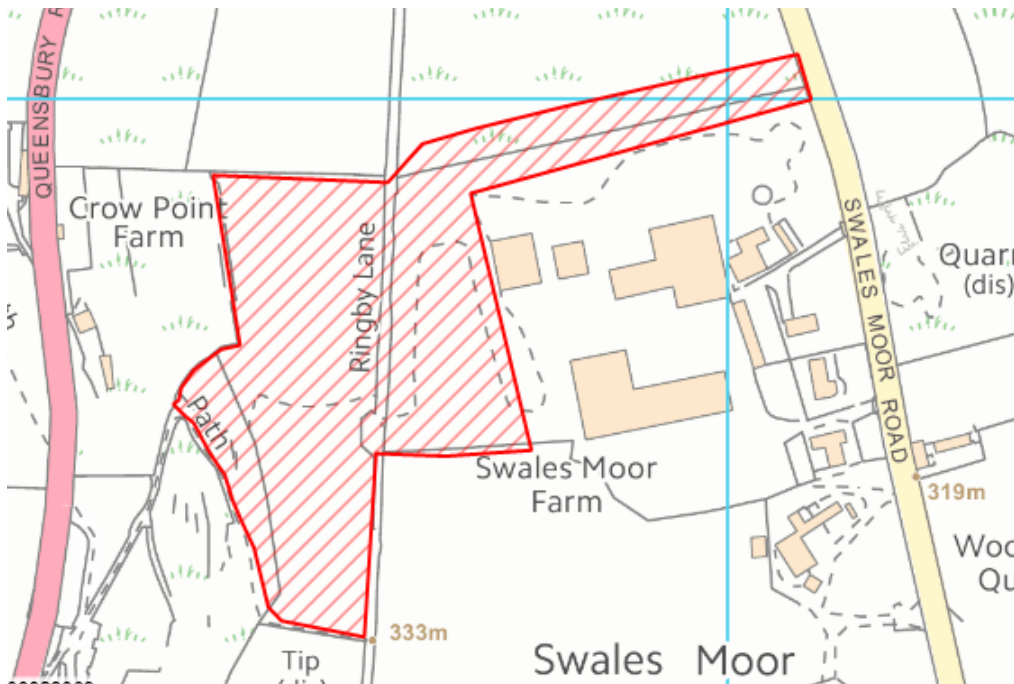
- 1.4 In relation to the proposed allocation at Swalesmoor (WLP2), the initial site submission from the operator extended some 15.47ha; this was reduced to 9.74ha when land to the north was removed from the proposed allocation.
- 1.5 The proposed allocation includes both existing buildings and undeveloped areas of land.
- 1.6 In relation to the developable area, for WLP2, this amounts to 2.03ha if the boundary were to be amended to the eastern side of Ringby Lane. If the

allocation retained the land to the west of Ringby Lane, the developable area would be increased to 4.48ha.

Map 2 – Swalesmoor – Smaller Developable Area Option (WLP2)



Map 3 – Swalesmoor – Larger Developable Area Option (WLP2)



- 1.7 The other proposed allocations only have temporary buildings on site, it has been assumed that the developable areas for both WLP3 and WLP4 are as per the site areas (1.55ha and 0.98ha respectively).
- 1.8 In total therefore, the developable areas of the proposed allocations are 6.04ha if the boundary at WLP2 (Swalesmoor) is amended to the eastern side of Ringby Lane. If the boundary remains to the west, the total developable capacity is 8.48ha.
- 1.9 When comparing the estimated capacity required as set out in the Waste Data Evidence Report Update (2016) this estimates that based on a 85% landfill diversion rate, approximately 4ha of additional land for recycling / composting is required and approximately 1.5ha of land is required for waste treatment.
- 1.10 This means that when refining the boundaries of the proposed allocations there is still sufficient land in relation to the estimated waste recycling, composting, and treatment capacity required as set out in the Waste Data Report Update 2016.

2 Waste permissions

- 2.1 The following table sets out the waste permissions from 2017 to the present day. As can be seen from the table, there is little change in terms of increasing (or decreasing) waste capacity within the borough, as the new permissions do not provide additional capacity in the context of the identified capacity as set out in the Waste Data Report Update 2016.
- 2.2 In relation to 17/01109/WAS this was an application related to the existing operation at proposed site allocation WLP1. However the proposal did not increase capacity, instead it was predicated on the basis of regulatory/compliance requirements (separation and segregation of waste) rather than an increase in processing capacity.

Application No	Description	Site	Area/ through put	Site Area	Decision date	Notes
16/01637/WAS	Aggregate Recycling Facility	Land @ Holmfield Ind Estate	50,000t/ann		25.5.2018	Time limited permission expires 31/5/2024

17/01109/WAS	Extension to composting building	TEG Environmental Sharneyford			19.2.2018	No change in through put
19/00386/WAM	Extension to existing site	KEMPS Balkram Edge Farm		1.9ha	19.05.2020	For storage only no recycling on this site
19/00610/WAM	Inert Recycling	Elizabeth Industrial Estate	Standard Permit	2280sqm	10.1.2020	– operational
19/00016	Anaerobic Digester	Brighthouse Waste Treatment Works		38410sqm	17.4.2019	Replace flood damaged infrastructure (Incinerator)
19/01380	Waste Transfer	Gas Holder Sedburgh Road	Standard Permit	5245sqm	11.3.2020	? Operational
20/00810/COU	WEE Recycling	Ashday Works	50,000 WEE 22,000 Plastics	5887 sqm	9.9.2020	Not Operational

3. Potential Capacity at Household Waste Recycling Sites

3.1 The recent cabinet paper with regards to the potential closure of council Household Waste Recycling Sites was raised during discussions at the stage 2 hearings on waste.

3.2 The option for closing three of the five Household Waste Recycling Sites (HWRS) was set out in a cabinet paper presented at the cabinet on the 5th October. The option was one of a number in relation to potential saving that the council are required to make in relation to waste services. Other options included a reduction in the frequency of doorstep collections. A further paper was presented to the subsequent cabinet on the 6th November, that resolved to carry out further discussions with the contractor and a final decision to be made on the option to be taken as part of the budget process for 2021/22 in February.

3.3 At the time of this paper therefore, it is difficult to establish with any degree of certainty any potential additional capacity within the HWRS at Sowerby Bridge, Elland or Brighouse, since it is dependent on future budgeting decisions of the Council.

3.4 Of the three HWRS referred to, Sowerby Bridge is a small site (0.145ha), Atlas Mill (Brighouse) is 0.39ha, whilst 'Ainleys' (Elland) is 0.22ha. In total therefore if all three were closed, this would potentially provide 0.75ha.

3.5 Sowerby Bridge HWRS is constrained to the south, east and west by woodland, highways and existing development. To the north the highway access to and from Wakefield Road is across a narrow bridge and would likely lead to objections from Highways in respect of an alternative waste facility.

3.6 The other two sites are less constrained than the Sowerby Bridge HWRS, however are still relatively small.

3.7 Given the above, there is uncertainty regarding the decision that will be made in respect of the three HWRS futures, and apparent constraints in relation to Sowerby Bridge in respect of its size and location as an alternative waste facility.

4. Waste Sites Assessment – Potential Supply of Employment land

4.1 The inspector at the stage 2 hearings raised concerns as to whether the methodology of the waste sites assessment process had given sufficient consideration of the potential supply of employment land.

4.2 This concern was related to the fact that three of the proposed waste sites were situated in the Green Belt.

4.3 As set out at para 2.5 of the Waste Sites Assessment, the methodology involved the compilation of an initial 'long list of potential sites' the sources of which included the council's Employment Land Review and existing RCUDP employment designations. The initial long list was identified through a review of potential sources of sites such as existing waste sites, sites identified in earlier plan preparation work, vacant brownfield land, and employment land. The following lists those different data sets that provided the sources of sites when compiling the long list:

- Existing waste allocations in the RCUDP;
- Sites identified in previous waste site assessments;
- National Land Use Database (NLUD);
- Contaminated Land;
- Employment Land Review;
- Existing RCUDP Employment designations;
- Existing waste management facilities;
- Previous waste site studies.

4.4 However, the inspector requested further details on the extent to which the employment land review and existing employment areas and / or allocations were considered, given that such locations can provide capacity for recycling.

4.5 In line with the methodology, employment (or any other) sites in the following locations were not considered:

- Sites less than 0.35ha (unless existing waste site and only if exact site boundary known);
- Special Protection Area;
- Special Area of Conservation;
- Sites of Special Scientific Interest;
- Conservation Areas;
- Historic Park and Gardens;
- Listed Buildings (Although if the Listed building was part of an overall larger site this remained in the list for further assessment);
- Scheduled Ancient Monuments (Class 1);
- Entirely Within Functional Floodplain (EA Data);
- Planning Permission implemented for Housing, School, Health Use;
- Duplicate Sites;

4.6 Following the initial sieve of exclusionary constraints 174 sites remained. Of these the following is a breakdown of the designation / source of the sites:

- Sites within Primary Employment Area designation – 65 sites
- New Employment Allocations – 17 sites
- Employment Land Review – 45 Sites
- Sites with some land within Green Belt – 64

4.7 The following provides a breakdown of the uses of the sites (where there was one and the site was not vacant at the time of the assessment)

- Employment site – In use - 23 sites
- Sites with existing or previous Waste Management Licences – 33
- Mineral sites – 28
- Mixed Use Sites – 8
- Adjacent to / granted permission for Residential Use – 25

4.8 Of the remaining sites, these were a mix of areas of Public Open Space, a Bus Depot, Access land to other sites, sites at high risk of flooding, a nature reserve and land below the 0.35ha threshold.

4.9 In summary, of the 174 initial long list of sites, 110 were within the urban area, whilst 64 were at least partially in the Green Belt.

