

Update to Waste Sites Assessment 2017



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2 Introduction

1 Introduction

- 1.1 As part of preparing the Local Plan, the council held a public consultation on potential waste sites in 2016. The [Waste Sites Assessment document](#) set out a proposed methodology and a list of potential waste allocations.
- 1.2 The Waste Site Assessment consultation focused on potential allocations for built waste facilities, for example recycling or waste treatment facilities. The district has significant landfill capacity in terms of inert waste in the shape of the site at Clockface Quarry, and as part of the Duty to Cooperate will work alongside other neighbouring and sub regional WPAs by conducting a monitor and manage approach to determine a strategy for landfill over the next decade. Policies in the Local Plan will support this approach to landfill.
- 1.3 This update report is intended to provide a summary of comments received as a result of the 2016 consultation, and provide details of those sites that are proposed for allocation as waste sites in the Local Plan Initial Draft consultation.

2 Feedback from 2016 Waste Sites Assessment Consultation

- 2.1** The following section summarises the representations made during the [Waste Sites Assessment consultation](#) in 2016.

Site Ref 70 Wakefield Road Brighouse (Now Ref WLP4)

- 2.2** Overall there were no substantial objections that would prevent the site being considered as a potential waste allocation in the Draft Local Plan. Historic England did provide comments concerning the potential impact a built waste facility could have on the historic landscape, specifically in relation to the Grade II Registered Historic Park and Garden at Kirklees Park. In addition, the Bridge carrying the northern section of railway track over the River Calder, downstream from Kirklees Cut, is a Grade II Listed Building. If allocated, Historic England commented that the plan should include a requirement that any development proposals will be required to assess the impact that they might have upon these assets and ensure that the elements which contribute to their significance are not harmed.
- 2.3** Given the site is a current waste facility (scrap yard), its performance against the methodology, and that the owners have submitted a Call for Sites proposing B1, B2, or B8 uses it is proposed to retain this site as a potential waste allocation in the Draft Local Plan, subject to mitigating any potential adverse impacts on the historic landscape.

Site Ref 44 Former Park Springs Quarry

- 2.4** Overall the consultation resulted in a number of substantial objections to this and other proposed site sites along Swalesmoor Road. The objections centred on the following concerns:
- Potential cumulative impacts from allocating and developing all the sites in the area;
 - The negative impacts on the Shibden Valley would be maximised by building on this site;
 - The impact on the historic environment (including, but not limited to Scout Hall) requires a Historic Impact Assessment;
 - The Environment Agency has concerns over potential historic contamination.
- 2.5** Given the potential cumulative impact and the potential impact on the historic environment it is proposed to discount this site from further consideration in the Draft Local Plan, especially as this is not an operational waste facility, and its development would add to those waste facilities already in operation in this locality.

Site Ref 63 Pule Hill Quarry

- 2.6** Overall the consultation resulted in a number of substantial objections to this and other proposed site sites along Swalesmoor Road. The objections centred on the following concerns:
- Potential cumulative impacts from allocating and developing all the sites in the area;
 - The impact on the historic environment (including, but not limited to Scout Hall) requires a Historic Impact Assessment;
 - The Environment Agency has concerns over potential historic contamination.

- 2.7** Given the potential cumulative impact and the potential impact on the historic environment it is proposed to discount this site from further consideration in the Draft Local Plan.

Site Ref 416 Stainland Road (Now Ref WLP3)

- 2.8** The site attracted comments from Historic England, Natural England and the Environment Agency. Whilst these were not objections both organisations highlighted potential issues should the site be allocated and subsequently developed. Historic England require that the Local Plan includes a criteria to ensure that any development proposals will be required to assess the impact they may have upon historic assets and ensure that the elements which contribute to their significance are not harmed.
- 2.9** Natural England's comments were focused on the location of the site in relation to the SPA and stated that if the proposed site was to accommodate a built waste facility that involved combustion process of greater than 50MW energy input it would require an air pollution assessment prior to the selection of the site, which would inform the Habitats Regulations Assessment (HRA) as well.
- 2.10** The Environment Agency's concerns focussed on the proximity of the site to the River Calder, and the potential impacts a waste site could have. The EA emphasised the need to ensure that any development proposals did not risk deterioration of the watercourse. These risks should be fully assessed, and the Council should be satisfied that measures are drawn up to ensure that no negative pollution impact on the water environment in this location.
- 2.11** In addition the EA were concerned about contaminated land and the impacts on human health. If remediation needs to be carried out to make a site safe, developers will be responsible for showing the Planning Authority that they have been successful, through ongoing monitoring or the submission of verification reports.
- 2.12** Overall, it is considered that the site is retained as a potential waste allocation in the Local Plan Initial Draft, subject to the Green Belt Review and the mitigation of potential contamination issues highlighted by the Environment Agency, as well as the impacts on the River Calder.

Site Ref 324 Former Tip Shroggs Road

- 2.13** A number of comments were received against this site. Historic England highlighted the proximity of the site to a Grade II Registered Historic Park and Garden. There needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the significance of this Historic Park and Garden and what effect the loss of this site and its subsequent development might have upon those significances.
- 2.14** If it is considered that the development of this site would harm elements which contribute to the significance of this landscape, then the Local Plan needs to set out the measures by which that harm might be removed or reduced. If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of any of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm.
- 2.15** Natural England's comments were focused on the location of the site in relation to the SPA and that if the proposed site was to accommodate a built waste facility that involved

combustion process of greater than 50MW energy input it would require an air pollution assessment prior to the selection of the site, which would inform the HRA as well. In addition they noted that deciduous woodland is found on the site, which is a priority habitat.

- 2.16** The Environment Agency also commented on the proposal. They noted that Hebble Brook Runs through the northern part of this site, and this is shown as flood risk zone 3. The Sustainability Appraisal should demonstrate clearly how the River Basin Management Plan has been taken into consideration. The Agency's main concerns related to the potential impacts that any future development on this site could have on the River Calder, and emphasised the need to ensure that any development proposals did not risk deterioration of the watercourse. In addition the EA were concerned about contaminated land and the impacts on human health. If remediation needs to be carried out to make a site safe, developers will be responsible for showing the Planning authority that they have been successful, through ongoing monitoring or the submission of verification reports. The site is also a valuable piece of Green Infrastructure.
- 2.17** Park Ward Neighbourhood Forum identified the shortage of useable open space and recreation facilities in the Northern part of the ward nearly two years ago, as part of the ongoing process of developing a Neighbourhood Plan for Park ward. Groundwork has done a report on whether the Shropps Valley area could be brought back into use as a valuable green lung that could be used by communities in Park Ward, Lee Mount and Ovenden.
- 2.18** Given the comments and objections against this site, it is no longer considered for allocation in the Local Plan Initial Draft as a waste site.

Site 435 Swalesmoor Farm (Now Ref WLP2).

- 2.19** This site was the subject of a number of objections, with concerns over the cumulative impact of developing additional waste facilities along Swalesmoor. Although this would be an extension to the existing waste management site, there were still objections to any additional land in this area being allocated. The Environment Agency, Natural England, and Historic England all made comments.
- 2.20** The issues are summarised below:
- Wherever new buildings were placed they would threaten the skyline above the Shibden Valley;
 - The impact on the historic environment (including, but not limited to Scout Hall) requires Historic Impact Assessment;
 - If the proposed allocation would involve a combustion process of >50MW, this would require an air pollution assessment;
 - Deciduous Woodland on site is a priority habitat;
 - Potential existing contamination issues;
 - Waste Water Treatment.
- 2.21** Although there are a number of objections to this site it is proposed as an extension to an existing waste site and is therefore preferred to other sites within the area in terms lessening the cumulative impact. It is likely that the original extension proposed would lead to a significant increased impact on the landscape, and therefore the boundary of the proposed allocation has been reduced. This alongside strict design policies will help to ensure impacts

on the landscape are mitigated. In addition a Historic Impact Assessment will need to be carried out prior to allocation of the site.

Site 269 Ringby Quarries.

2.22 This site was the subject of a number of objections, with concerns over the cumulative impact of developing additional waste facilities along Swalesmoor. The objections centred on the following concerns:

- Potential cumulative impacts on the Shibden Valley from allocating and developing all the sites in the area;
- The impact on the historic environment ;
- If the proposed allocation would involve a combustion process of >50MW, this would require an air pollution assessment;
- The Environment Agency has concerns over potential historic contamination.

2.23 Given the potential cumulative impact and the potential impact on the historic environment it is proposed to discount this site from further consideration in the Draft Local Plan. The site is however also proposed for employment use; whether a reduction in the site area would make this a suitable site is uncertain however.

3 Additional Sites

- 3.1** As part of the consultation representations were made against an existing operational waste site at Sharneyford (Site Ref 120 / WLP1). The operators representative sought to propose an extension to the existing site, similar to the approach of the proposed extension to the Swalesmoor Farm site (Site Ref 70 / WLP2).
- 3.2** A detailed response to the methodology and support to allocate the existing waste site at Sharneyford was submitted. The consultee's representations focussed on two main issues; firstly concerns over why existing sites had not been included in the assessment and secondly, a proposal to allocate an extension to the existing site at Sharneyford.
- 3.3** Prior to the consultation it was unclear as to whether the operators at Sharneyford wished for an extension to the site, and, having taken the position that existing sites would not be assessed as they would be safeguarded in the new Local Plan, the site was not submitted for further assessment. However having received the comments from the sites representative it became clear that there was potential for extending an existing site. In total the site scored 815 in the methodology, which is the highest score for those sites considered for allocation in the Local Plan Initial Draft.
- 3.4** Therefore having considered the status of the site it is proposed to include the extension to the existing site at Sharneyford as an allocation in the Local Plan Initial Draft.

8 Proposed Draft Local Plan Allocations

4 Proposed Draft Local Plan Allocations

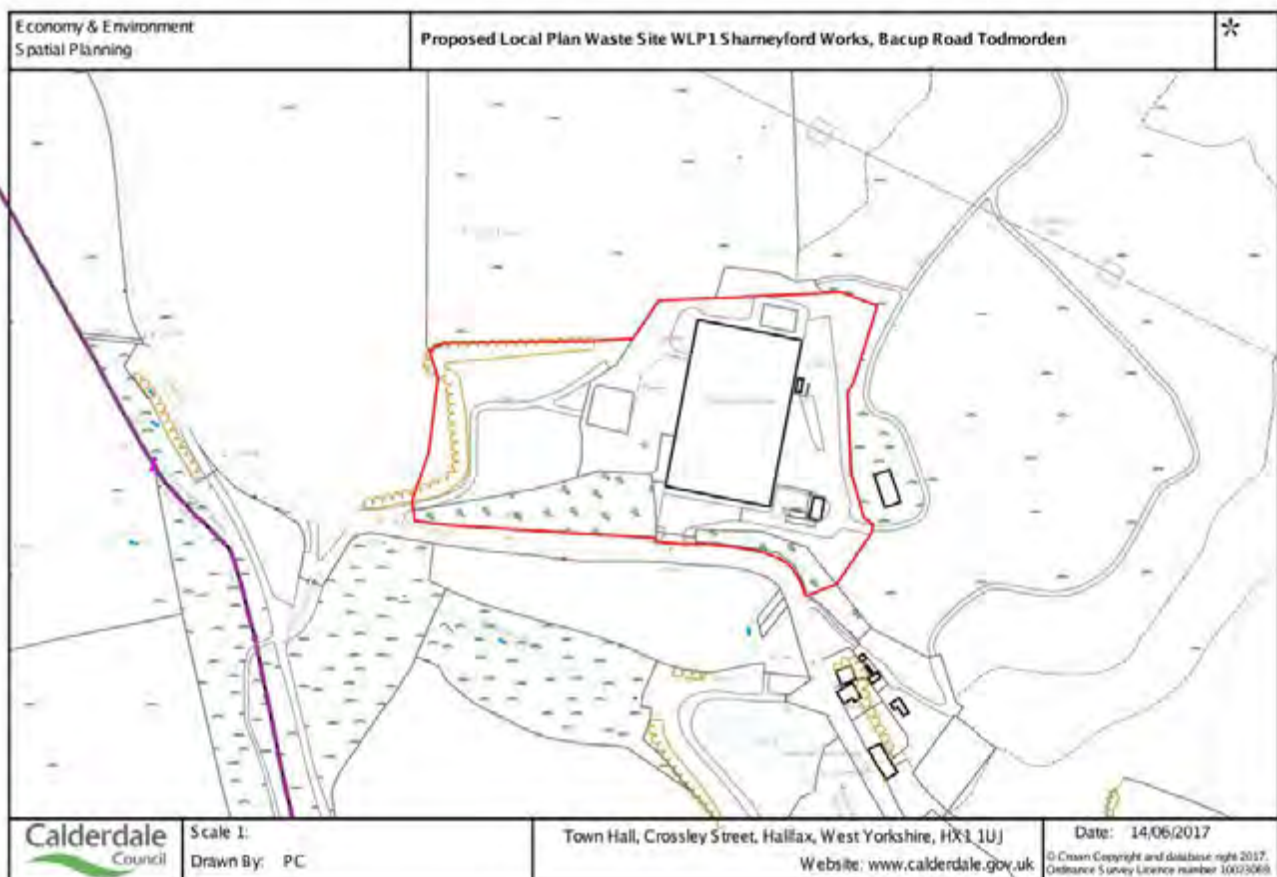
4.1 Having considered the comments received during the 2016 consultation, the following sites are proposed in the Local Plan Initial Draft:

- Site Ref 120 – Sharneyford Works, Bacup road, Todmorden – Local Plan Reference WLP1;
- Site Ref 435 - Swalesmoor Farm, Swalesmoor Road, Halifax – Local Plan Reference WLP2;
- Site Ref 416 - Stainland Road, West Vale, Halifax – Local Plan Reference WLP3;
- Site Ref 70 – Land / Premises at Wakefield Road, Brighouse – Local Plan Reference WLP4

4.2 Comments can be made against the proposed waste site allocations and waste policies as part of the Local Plan Initial Draft Public Consultation. All the sites and waste policies have been subject to a Sustainability Appraisal (incorporating Strategic Environmental Assessment) which is available to view and comment upon as part of the Local Plan consultation.

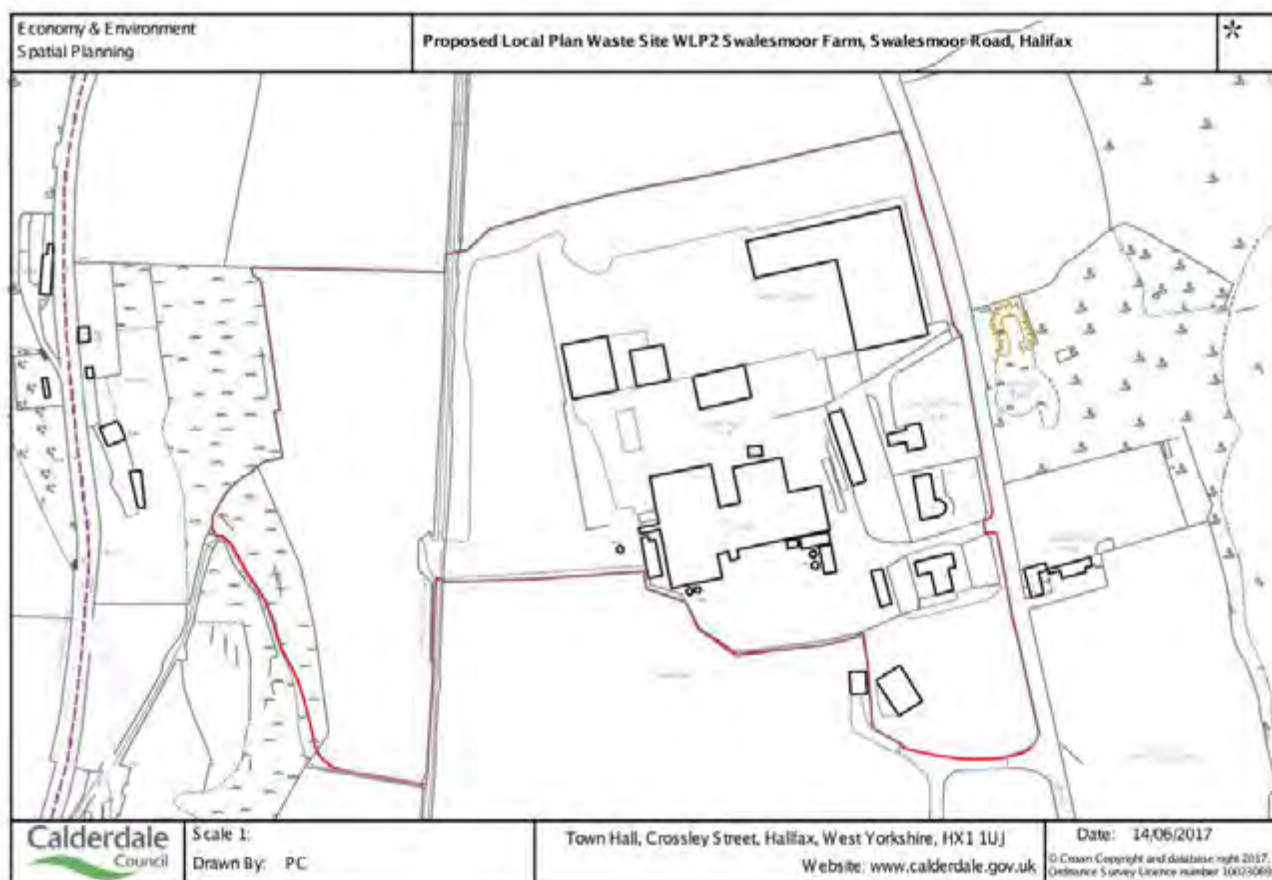
4.3 The following sets out a site location plan and assessment summary of the four sites that are proposed for inclusion in the Local Plan Initial Draft.

Map 4.1 WLP1 Sharneyford Works, Bacup Road, Todmorden



Site Ref	WLP1 (Former ref 120)			Site Specific Comments					
Address 1	Sharneyford Works			Site is an existing waste facility where the operator has submitted a Call for Sites to extend the operation. The site is isolated and opposite former landfill and quarrying operations, and is considered to be potentially suitable for an allocation / extension. Any future allocation would be subject to removal from the Area Around Todmorden and the requirement to demonstrate exceptional circumstances.					
Address 2	Bacup Road								
Address 3									
Settlement	Sharneyford								
Town	Todmorden								
Postcode									
Area (Hectares)	3.15								
Primary Constraints Score	510	Secondary Constraints Score	180	Additional Constraints Score	80	Positive Criteria Score	45	Total Score	815

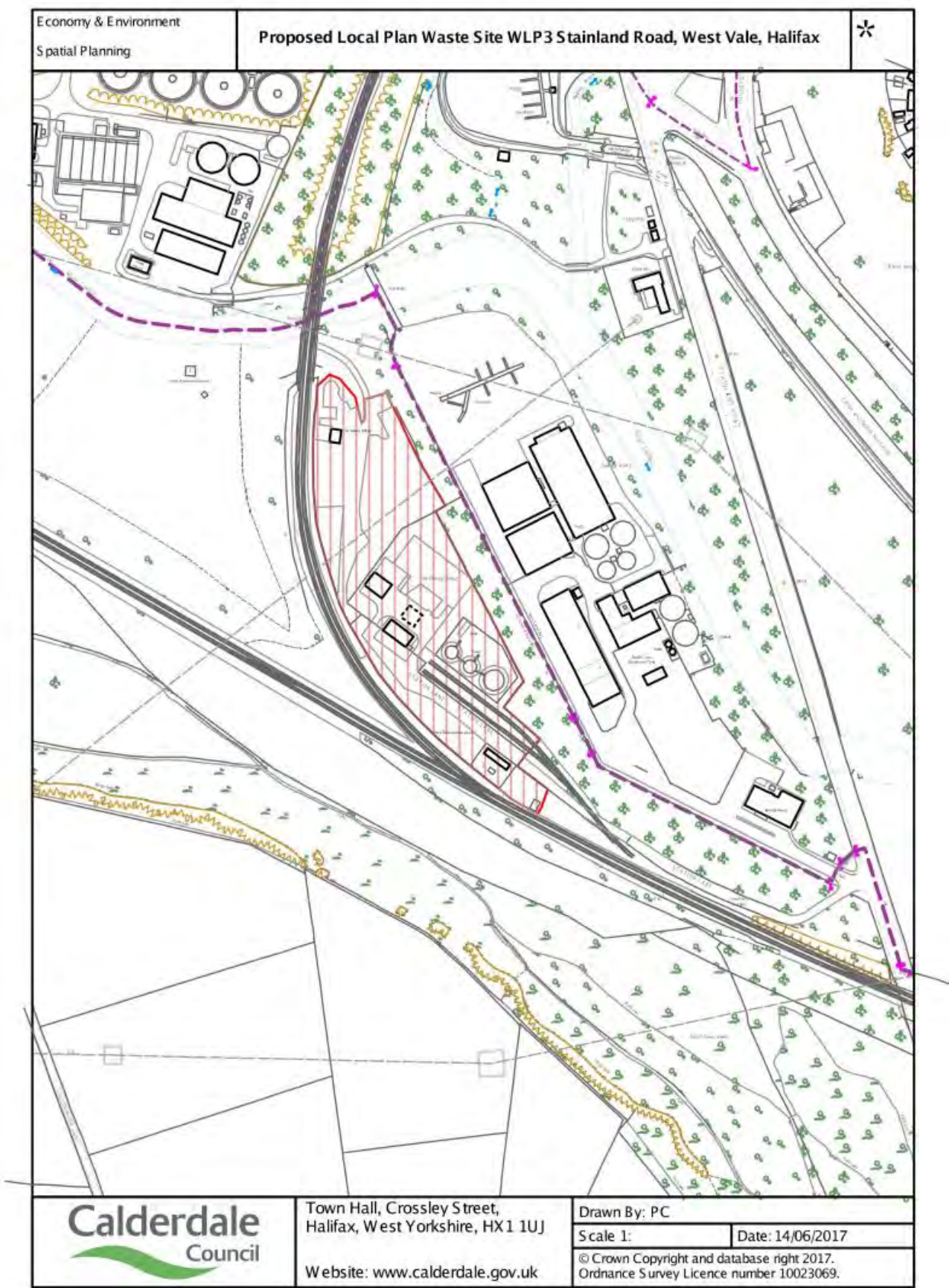
Map 4.2 WLP2 Swalesmoor Farm, Swalesmoor Road, Halifax



10 Proposed Draft Local Plan Allocations

Site Ref	WLP2 (Formerly ref 435)			Site Specific Comments					
Address 1	Swalesmoor Farm			Site incorporates an existing waste management site, however the proposed allocation would incorporate a much larger area to the north and west of the existing site. The site is adjacent to other compatible uses such as quarrying and an aggregates recycling and training facility, and is considered to be potentially suitable for an allocation. Any future allocation would be subject to removal from the Green Belt and the requirement to demonstrate exceptional circumstances. The original site boundary submitted as part of the Call for Sites has been amended to reduce the potential allocation.					
Address 2	Swalesmoor Road								
Address 3									
Settlement	Swalesmoor								
Town	Halifax								
Postcode									
Area (Hectares)	9.74								
Primary Constraints Score	450	Secondary Constraints Score	135	Additional Constraints Score	100	Positive Criteria Score	45	Total Score	730

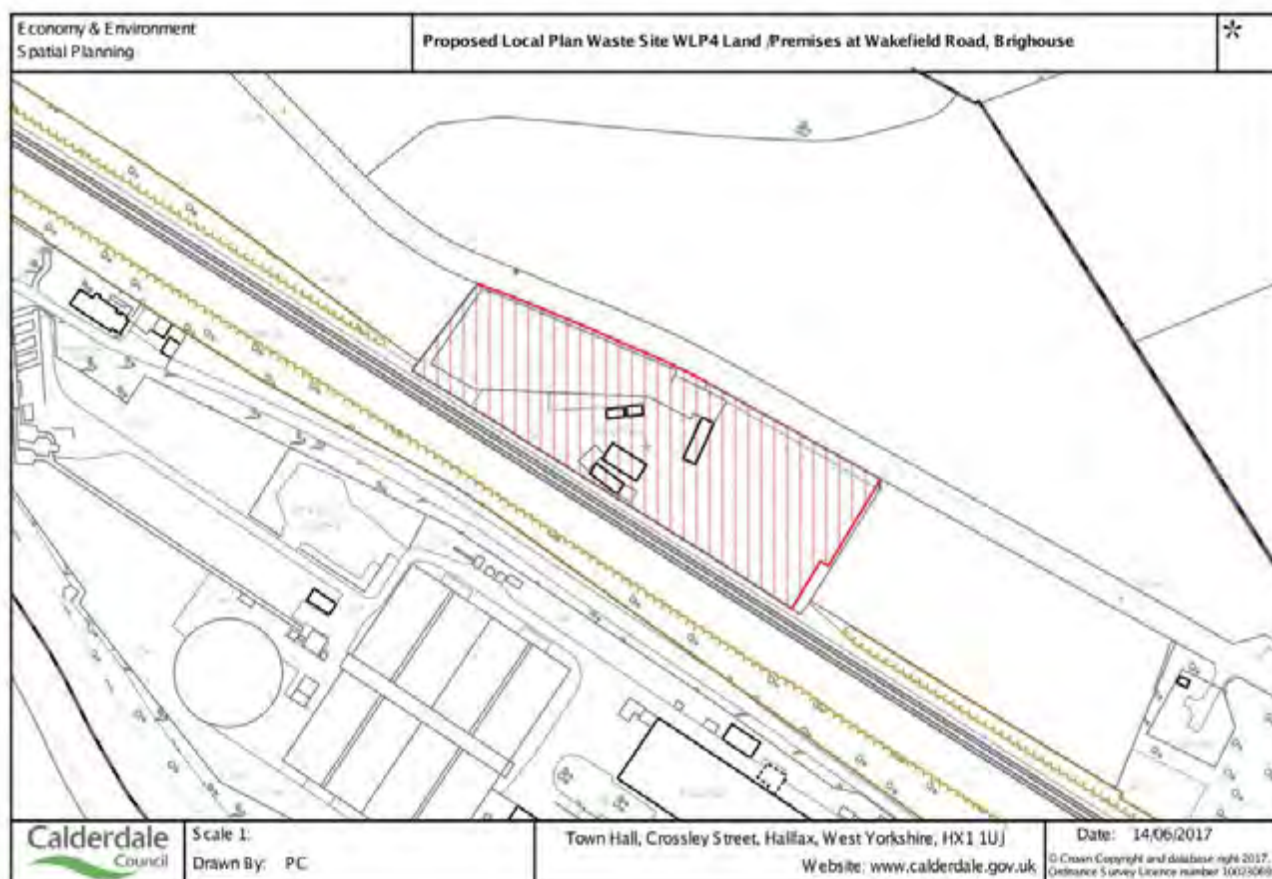
Map 4.3 WLP3 Stainland Road, West Vale, Halifax



12 Proposed Draft Local Plan Allocations

Site Ref	WLP3 (Formerly ref 416)			Site Specific Comments					
Address 1	Stainland Road			<p>Site originally identified in previous waste studies. Appears to be used for storage. Adjacent to an aggregates recycling facility. Site scores comparatively well against the primary constraints, but has a lower score against the secondary constraints, due to its Green Belt location. The site is one of the top performers against the additional constraints, although as it is a greenfield site outside an existing primary employment area does not score against the positive criteria score. Any future allocation would be subject to removal from the Green Belt and the requirement to demonstrate exceptional circumstances.</p>					
Address 2									
Address 3									
Settlement	West Vale								
Town	Halifax								
Postcode									
Area (Hectares)	1.55								
Primary Constraints Score	440	Secondary Constraints Score	95	Additional Constraints Score	100	Positive Criteria Score	0	Total Score	635

Map 4.4 WLP4 Land / Premises at Wakefield Road, Brighouse



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Site Ref	WLP4 (formerly ref 70)			Site Specific Comments					
Address 1	Land/premises at			Operational Scrap Yard, owners proposing B1,B2,or B8 uses through Call for Sites (CFS-0389). Potential site, impact from a waste facility would be lessened due to adjacent uses (sewage works) and location. Scored well against the Primary constraints, although site lies opposite Kirklees Hall Park which affects the secondary constraints score. In terms of the additional constraints and positive criteria the site preforms well. Any future allocation would be subject to removal from the Green Belt and the requirement to demonstrate exceptional circumstances.					
Address 2									
Address 3	Wakefield Road								
Settlement									
Town	Brighouse								
Postcode	WF14 0BU								
Area (Hectares)	0.98								
Primary Constraints Score	480	Secondary Constraints Score	120	Additional Constraints Score	100	Positive Criteria Score	60	Total Score	760

