

Bradford District Local Plan 2025 to 2043

Regulation 19 (Publication) Draft

Waste Movements Background Paper

September 2026

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Contents

Contents	2
Abbreviations	3
1 Introduction	4
2 Defining Strategic & Non-Strategic Waste Movements	4
3 Waste Arisings in Bradford	5
4 Waste Exports From Bradford	7
5 Waste Imports to Bradford District.....	20
6 Hazardous Waste Movements	25
7 Strategic Waste Movements.....	43
8 Duty to Co-operate/Engagement Letter	44
9 Summary of Responses.....	44
Appendix 1: Strategic Waste Movements – Duty to Co-operate Letter (Example)	47
Appendix 2: Duty to Co-operate Letter – Summary of Responses	49

Abbreviations

The following abbreviations are used within this document:

- C+D – Construction and Demolition Waste
- EE – East of England region
- EM – East Midlands region
- EWC – European Waste Code
- HIC/HCI Waste – Household, Industrial & Commercial Waste/Household, Commercial & Industrial Waste
- HWDI – Hazardous Waste Data Interrogator
- LDN – Greater London
- MoU – Memorandum of Understanding
- NE – North East Region
- NIR – Northern Ireland
- NW – North West Region
- SCO – Scotland
- SE – South East
- SW – South West
- WAL – Wales
- WDI – Waste Data Interrogator
- WM – West Midlands
- WPA – Waste Planning Authority
- WTAB – Waste Technical Advisory Body
- YH – Yorkshire & Humber
- YHWTAB – Yorkshire & Humber Waste Technical Advisory Body

1 Introduction

- 1.1 The commercial nature of the waste industry means that it crosses local authority boundaries to be managed, treated and disposed of. In some cases, particularly when dealing with hazardous waste, there are a limited number of facilities in the country that are licenced to manage specific waste types. Accordingly, it is important to understand the levels of waste imported and exported to/from Bradford District, and where it comes from/goes to.
- 1.2 Waste is identified as a key issue to address via the Duty to Co-operate. Through this and the West Yorkshire Combined Authority, the Council continues to work closely with its neighbours in West Yorkshire. Contact has taken place under the Duty with waste planning authorities, that import/export waste from/to Bradford, with a focus on strategic waste movements.

2 Defining Strategic & Non-Strategic Waste Movements

- 2.1 There is no specific guidance setting out what constitutes strategic and non-strategic waste movements between waste planning authority (WPA) areas. It is generally up to local authorities to determine this based on their own particular circumstances.
- 2.2 The Council was party to a Memorandum of Understanding (MoU) drawn up by the Yorkshire and Humber Waste Technical Advisory Body (YHWTAB) setting thresholds to define strategic waste movements. There was a consensus amongst the YHWTAB's members that waste movements of more than 1,000 tonnes of non-hazardous waste and 100 tonnes of hazardous should be considered strategic in nature. It is noted that Inert/Construction and Demolition waste was not considered separately. These thresholds were used by neighbouring WPAs (Kirklees and Wakefield) as part of addressing the Duty to Co-operate in relation to waste when drawing up their Local Plans.
- 2.3 From examining approaches elsewhere in the country, different WTABs and WPAs have agreed different thresholds to reflect their circumstances. Examples are set out below:

Table 2.1: Examples of Thresholds Used to Determine Strategic Waste Movements

Waste Planning Authority/WTAB Region	Strategic Waste Movement Thresholds
East of England region (agreed June 2020)	Non-Hazardous Waste (Household, Commercial & Industrial Waste): 5,000 tonnes per annum. Inert/Construction & Demolition Waste: 10,000 tonnes per annum. Hazardous Waste: 100 tonnes per annum.
Nottingham City Council and Nottinghamshire County Council	Non-Hazardous Waste: 5,000 tonnes per annum. Inert Waste: 10,000 tonnes per annum. Hazardous Waste: 500 tonnes per annum.
Oxfordshire County Council	Non-Hazardous Waste: 5,000 tonnes per annum. Inert Waste: 10,000 tonnes per annum. Hazardous Waste: 100 tonnes per annum.

South Yorkshire (Barnsley, Doncaster, Rotherham, Sheffield Councils)	Non-Hazardous Waste (Household, Commercial & Industrial Waste) (from an individual WPA to an individual waste management facility): 10,000 tonnes per annum. Inert waste (from an individual WPA to an individual waste management facility): 10,000 tonnes per annum (for Barnsley, Doncaster & Rotherham) and 15,000 tonnes per annum (for Sheffield). Hazardous Waste (from an individual WPA to another WPA for a specific management method (e.g. recovery, treatment, landfill, etc.): 350 tonnes per annum (for Barnsley), 500 tonnes per annum (for Doncaster & Rotherham), and 1,000 tonnes per annum (for Sheffield).
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2.4 From examining the Environment Agency's Waste Data Interrogator (WDI) and the quantities of waste of exported from Bradford District, it is considered that following thresholds should be applied to strategic waste movements:

- Non-Hazardous Waste (Household/Industrial/Commercial and Inert/C+D) – 1,000 tonnes
- Hazardous Waste: 100 tonnes.

3 Waste Arisings in Bradford

3.1 To understand how much waste moves to/from Bradford District for management, it is important to understand how much is produced. The Environment Agency's interrogators – the Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI) – are the main starting point for doing so.

3.2 The WDI is consolidated version of data reported by permitted waste management sites on a quarterly basis to the Environment Agency. It lists every facility showing the tonnage received and the tonnage removed by EWC Code and facility type. The HWDI is like the WDI but does not include details of every facility. The most recent edition of the WDI, based on 2023 data, was published in September 2024. The HWDI was also at around the same time.

3.3 The WDI 2023 showed a total of 657,251 tonnes of waste arose in Bradford District, a decrease from the previous year. The largest percentage (75%) of the waste arising in 2023 consisted of Household, Industrial or Commercial (HIC) waste (see **Table 3.1**).

Table 3.1: Waste Arisings in Bradford District (2016 to 2023)

	2016	2017	2018	2019	2020	2021	2022	2023
Tonnage	728,629	846,548	829,330	859,393	596,260	810,494	920,537	657,251
<i>Household/Industrial /Commercial</i>	<i>388,222</i>	<i>508,633</i>	<i>596,063</i>	<i>587,869</i>	<i>470,090</i>	<i>607,273</i>	<i>683,729</i>	<i>490,218</i>
<i>Hazardous</i>	<i>16,472</i>	<i>18,193</i>	<i>14,997</i>	<i>19,052</i>	<i>15,794</i>	<i>21,697</i>	<i>19,192</i>	<i>20,879</i>

<i>Inert/Construction & Demolition</i>	320,934	319,723	216,270	252,471	110,377	181,524	217,616	146,154
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Source: Environment Agency, Waste Data Interrogators (2016 to 2023)

- 3.4 Of the waste arising in 2023, 337,025 tonnes (51%) were managed at facilities within Bradford District, whilst 320,226 tonnes (49%) were exported to facilities in other areas. Deposits at facilities in the district totalled 998,210 tonnes, of which 661,185 tonnes originated elsewhere (see **Table 3.2**).

Table 3.2: Management of Waste Arising in Bradford District (by location)

	2020		2021		2022		2023	
	Tonnage	%	Tonnage	Tonnage	%	Tonnage	Tonnage	%
Total Waste Arisings	592,260	100	810,494	100	920,537	100	657,251	100
Managed with Bradford District	338,403	57	493,331	61	530,224	58	337,025	51
Exported to Other WPA Areas	257,857	43	317,164	39	390,314	42	320,226	49
Household, Industrial, Commercial	470,090	100	607,273	100	683,729	100	490,218	100
- Managed within Bradford District	288,530	61	367,794	61	386,649	57	255,366	52
- Exported to Other WPA Areas	181,559	39	239,479	39	297,080	43	234,852	48
Hazardous	15,794	100	21,697	100	19,192	100	20,879	100
- Managed within Bradford District	2,425	15	4,170	19	2,820	15	1,782	9
- Exported to Other WPA Areas	13,369	85	17,527	81	16,373	85	19,097	91
Inert/Construction & Demolition	110,377	100	181,524	100	217,616	100	146,154	100
- Managed within Bradford District	47,448	43	121,367	67	140,755	65	79,876	55

- Exported to Other WPA Areas	62,929	57	60,157	33	76,861	35	66,277	45
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Source: Environment Agency, Waste Data Interrogators (2020 to 2023)

4 Waste Exports From Bradford

- 4.1 As set out in **Paragraph 1** and **Table 3.1** (above) of the waste arising in Bradford District in 2023 various quantities are exported across England to be managed. However, of this around 74% was managed within the wider Yorkshire and Humber region. The next largest proportions were exported to the East Midlands (around 12%), North West (around 10%) and South East (around 3%) (see **Table 4.1**).

Table 4.1: Destination of Waste Arising in Bradford District (2023) (By Region)

Destination Region	Total Exported (Tonnes)	Household, Industrial, Commercial Waste (Tonnes)	Hazardous Waste (Tonnes)	Inert/C+D Waste (Tonnes)	Percentage (%)
East Midlands	37,340.30	34,644.09	2,333.37	362.83	11.66
East of England	1,155.21	538.83	17.96	598.42	0.36
London	167.93	36.75	6.73	124.45	0.05
North East	3,562.57	2,674.63	868.11	19.82	1.11
North West	30,585.72	23,922.87	6,459.09	198.11	9.55
South East	9,536.76	9,512.64	24.12	0.00	2.98
South West	24.31	19.89	4.42	0.00	0.01
West Midlands	1,371.62	571.20	797.46	0.76	0.43
Yorkshire & Humber	236,480.72	159,311.34	8,286.41	64,968.00	73.85
Mobile Plant	0.35	0.00	0.35	0.00	0.00
Total	320,225.78	231,232.54	18,798.02	66,272.39	100

Source: Waste Data Interrogator, 2023 (Environment Agency)

- 4.2 **Table 4.2** shows that around 60% of the waste arising in Bradford is managed within the West Yorkshire area (Calderdale, Kirklees, Leeds or Wakefield excluding Bradford). Around 9% is exported to North Yorkshire with 6% going to the South Yorkshire (Barnsley, Doncaster, Rotherham or Sheffield). Around 5% went to Merseyside (Halton, Knowsley, Liverpool, St Helens, Sefton, or Wirral) whilst 4.5% went to Nottinghamshire (Nottingham City or Nottinghamshire County). 3% was exported to Derbyshire (City of Derby and Derbyshire County).

Table 4.2: Destination of Waste Arising in Bradford District (2023) (by Sub-Region)

Region	Sub-Region	Total (Tonnes)	Household, Industrial & Commercial Waste	Hazardous Waste	Inert/C+D Waste	%
EM	Derbyshire	9,676.92	9,099.05	449.81	128.06	3.02
EM	Leicestershire	41.52	41.31	0.21	0.00	0.01
EM	Lincolnshire	11,547.46	11,312.83	1.19	233.44	3.61
EM	Northamptonshire	1,525.01	683.87	841.14	0.00	0.48
EM	Nottinghamshire	14,549.69	13,507.33	1,041.02	1.33	4.54
EE	Bedfordshire	543.42	534.94	8.49	0.00	0.17
EE	Cambridgeshire	1.46	0.39	0.27	0.80	0.00
EE	Essex	601.94	3.50	0.82	597.62	0.19
EE	Hertfordshire	8.38	0.00	8.38	0.00	0.00
LDN	East London Waste Authority	36.53	36.53	0.00	0.00	0.01
LDN	North London Waste Authority	124.45	0.00	0.00	124.45	0.04
LDN	South East London	6.73	0.00	6.73	0.00	0.00
LDN	West London Waste Authority	0.22	0.22	0.00	0.00	0.00
MP	Mobile Plant	0.35	0.00	0.35	0.00	0.00
NE	Northumberland	0.84	0.00	0.84	0.00	0.00
NE	Tees Valley Unitary Authorities	3,466.87	2,623.22	823.83	19.82	1.08
NE	Tyne & Wear	94.85	51.42	43.44	0.00	0.03
NW	Cheshire	2,441.76	511.84	1,929.41	0.51	0.76
NW	Cumbria	108.42	108.42	0.00	0.00	0.03
NW	Greater Manchester	6,576.20	5,674.74	852.60	77.46	2.05
NW	Lancashire	4,309.68	2,446.79	1,651.13	74.69	1.35
NW	Merseyside	17,149.67	15,178.68	1,925.54	45.45	5.36

SE	Buckinghamshire	2,890.76	2,890.76	0.00	0.00	0.90
SE	Hampshire	24.72	0.60	24.12	0.00	0.01
SE	Isle of Wight	0.74	0.74	0.00	0.00	0.00
SE	Kent	6,620.54	6,620.54	0.00	0.00	2.07
SW	Bath, Bristol & South Gloucestershire	8.97	4.56	4.41	0.00	0.00
SW	Gloucestershire	1.00	0.99	0.01	0.00	0.00
SW	Somerset	14.34	14.34	0.00	0.00	0.00
WM	Herefordshire	2.18	2.18	0.00	0.00	0.00
WM	Shropshire	29.90	12.84	17.06	0.00	0.01
WM	Staffordshire	220.41	146.58	73.07	0.76	0.07
WM	Warwickshire	0.87	0.67	0.20	0.00	0.00
WM	West Midlands Met Districts	1,090.09	411.14	678.96	0.00	0.34
WM	Worcestershire	28.18	0.00	28.18	0.00	0.01
YH	Former Humberside	2,862.82	1,774.98	295.84	792.00	0.89
YH	North Yorkshire	27,453.36	6,180.80	366.53	20,889.31	8.57
YH	South Yorkshire	19,427.17	9,438.07	1,251.29	8,737.81	6.07
YH	West Yorkshire*	186,737.37	145,529.22	6,654.85	25,065.57	58.31
Total		320,225.78	226,844.07	18,979.72	56,789.08	100

Source: Waste Data Interrogator, 2023 (Environment Agency)

*Excludes waste managed at facilities in Bradford District

- 4.3 Close to 51% of the waste arising in Bradford District was managed locally and not exported to other areas. Of the remaining tonnage, 43% was managed in Leeds, with 8% being managed in North Yorkshire, around 5% in Wakefield, around 5% in Kirklees, 4.6% in Calderdale, 4.5% in Liverpool, around 4% in Nottinghamshire, and around 3% in Lincolnshire, Doncaster and Derbyshire respectively (see **Table 4.3**).

Table 4.3: Destination of Waste Arising in Bradford District (2023) (by Waste Planning Authority)

Region	Destination WPA	Tonnes Received Total (Tonnes)	Household, Industrial & Commercial Waste (Tonnes)	Hazardous Waste (Tonnes)	Inert/C+D Waste (Tonnes)	%
EM	City of Derby	16.12	16.12	0	0	0.01
EM	Derbyshire	9,660.80	9,082.94	449.81	128.06	3.02
EM	Leicester City	4.21	4.21	0	0	0.00
EM	Leicestershire	37.31	37.10	0.21	0	0.01
EM	Lincolnshire	11,547.46	11,312.83	1.19	233.44	3.61
EM	North Northamptonshire	1,523.05	681.91	841.14	0	0.48
EM	West Northamptonshire	1.96	1.96	0	0	0.00
EM	Nottingham City	938.47	97.54	840.92	0	0.29
EM	Nottinghamshire	13,611.22	13,409.79	200.10	1.33	4.25
EE	Bedford	543.42	534.94	8.49	0	0.17
EE	Cambridgeshire	1.42	0.35	0.27	0.80	0.00
EE	Essex	4.32	3.50	0.82	0	0.00
EE	Hertfordshire	8.38	0.00	8.38	0	0.00
EE	Peterborough	0.04	0.04	0	0	0.00
EE	Thurrock	597.62	0	0	597.62	0.19
LDN	Barking & Dagenham	36.53	36.53	0	0	0.01
LDN	Bexley	6.73	0	6.73	0	0.00
LDN	Ealing	0.22	0.22	0	0	0.00
LDN	Waltham Forest	124.45	0	0	124.45	0.04
MOB	Mobile Plant	0.35	0	0.35	0	0.00
NE	Darlington	1.55	0	1.55	0	0.00
NE	Gateshead	62.25	20.04	42.21	0	0.02
NE	Hartlepool	1,389.24	1,389.24	0	0	0.43

NE	Middlesbrough	42.32	42.32	0	0	0.01
NE	Northumberland	0.84	0	0.84	0	0.00
NE	Redcar & Cleveland	496.81	319.44	177.37	0	0.16
NE	South Tyneside	0.50	0	0.50	0	0.00
NE	Stockton on Tees	1,536.95	872.22	644.91	19.82	0.48
NE	Sunderland	32.11	31.38	0.73	0	0.01
NW	Blackburn with Darwen	126.25	125.55	0.70	0	0.04
NW	Bolton	116.34	28.31	16.03	72.00	0.04
NW	Bury	4,474.59	4,362.18	112.41	0	1.40
NW	Cheshire East	477.61	472.87	4.23	0.51	0.15
NW	Cheshire West & Chester	1,964.15	38.97	1,925.18	0	0.61
NW	Cumberland	108.42	108.42	0	0	0.03
NW	Halton	2,016.74	2,016.74	0	0	0.63
NW	Knowsley	382.40	5.58	360.73	16.09	0.12
NW	Lancashire	4,183.42	2,326.89	1,781.84	74.69	1.31
NW	Liverpool	14,520.54	12,957.38	1,533.80	29.36	4.53
NW	Manchester	90.59	71.66	18.93	0	0.03
NW	Oldham	0.22	0.07	0.14	0	0.00
NW	Salford	1,195.82	670.82	525.00	0	0.37
NW	St Helens	229.98	198.98	31.00	0	0.07
NW	Stockport	2.40	2.40	0	0	0.00
NW	Tameside	172.26	136.07	36.20	0	0.05
NW	Trafford	405.87	287.67	112.73	5.46	0.13
NW	Wigan	118.11	117.95	0.16	0	0.04
SE	Buckinghamshire	2,890.76	2,890.76	0	0	0.90
SE	Hampshire	24.72	0.60	24.12	0	0.01
SE	Isle of Wight	0.74	0.74	0	0	0.00

SE	Kent	6,620.54	6,620.54	0	0	2.07
SE	Bristol City	5.89	4.56	1.33	0	0.00
SE	Gloucestershire	1.00	0.99	0.01	0	0.00
SE	North Somerset	3.08	0	3.08	0	0.00
SE	Somerset	14.34	14.34	0	0	0.00
WM	Birmingham City	244.91	241.99	2.92	0	0.08
WM	Coventry	1.50	1.50	0	0	0.00
WM	Dudley	11.72	11.72	0	0	0.00
WM	Herefordshire	2.18	2.18	0	0	0.00
WM	Sandwell	601.48	22.93	578.55	0	0.19
WM	Shropshire	7.80	7.80	0	0	0.00
WM	Staffordshire	76.09	2.26	73.07	0.76	0.02
WM	Stoke on Trent	144.32	144.32	0	0	0.05
WM	Telford & Wrekin	22.10	5.04	17.06	0	0.01
WM	Walsall	230.48	132.99	97.49	0	0.07
WM	Warwickshire	0.87	0.67	0.20	0	0.00
WM	Worcestershire	28.18	0	28.18	0	0.01
YH	Barnsley	1,607.31	1,480.65	91.75	34.92	0.50
YH	Calderdale	14,841.46	13,519.13	9.36	1,312.97	4.63
YH	Doncaster	10,211.88	7,040.62	51.48	3,119.78	3.19
YH	East Riding of Yorkshire	1,014.38	222.38	0	792.00	0.32
YH	Kingston upon Hull	1,492.06	1,476.36	15.71	0	0.47
YH	Kirklees	16,105.03	4,858.01	2,199.29	9,047.73	5.03
YH	Leeds	138,546.49	119,104.89	1,793.41	17,648.19	43.27
YH	North East Lincolnshire	312.11	74.07	238.04	0	0.10
YH	North Lincolnshire	44.27	2.18	42.09	0	0.01
YH	North Yorkshire	26,868.34	5,917.26	61.77	20,889.31	8.39

YH	Rotherham	6,291.33	571.87	731.59	4,987.87	1.96
YH	Sheffield	1,316.65	344.93	376.48	595.24	0.41
YH	Wakefield	17,244.39	8,047.20	2,652.79	6,544.41	5.39
YH	York, City of	585.02	263.54	321.48	0	0.18
Total		320,225.78	234,852.12	19,096.85	66,276.81	100

Source: Waste Data Interrogator, 2023 (Environment Agency)

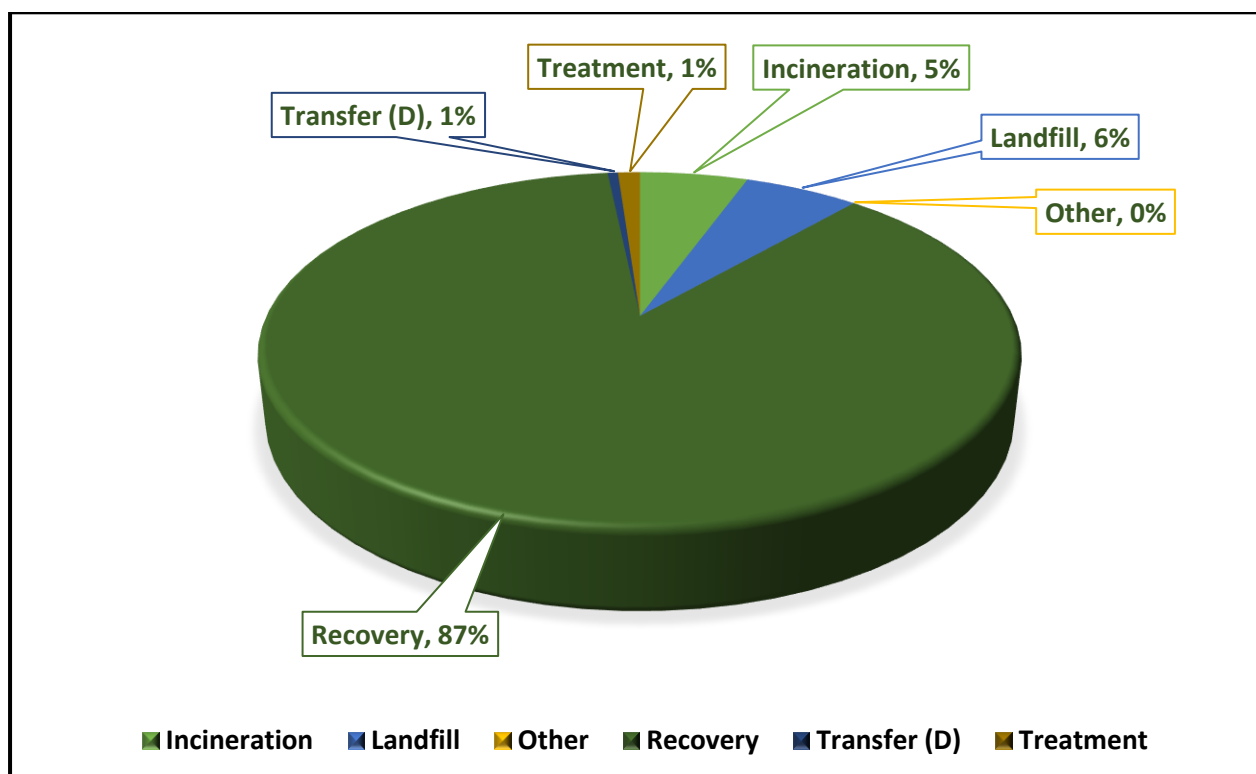
- 4.4 In relation to the fate of waste exported from Bradford District to other areas, the majority (87%) was sent to facilities for recovery (see **Table 4.4**). This means the principal result is where waste serves a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or where waste is prepared to fulfil that function, in the plant or in the wider economy.

Table 4.4: Fate of Waste Exported from Bradford District (2023)

	Incineration	Landfill	Other	Recovery	Transfer (D)	Treatment
East Midlands	13,404	-	-	22,964	154	819
East of England	0.01	-	-	1,012	135	9
London	-	-	-	168	-	-
North East	1,553	481	-	1,244	105	179
North West	1,670	4,762	-	22,544	752	857
South East	24	-	-	9,513		
South West	-	-	-	19	1	5
West Midlands	29	-	-	1,001	168	174
Yorkshire & Humber	978	13,556	1	220,037	355	1,554
Mobile Plant	-	-	-	0.4	-	-
Total	17,658	18,799	1	278,502	1,670	3,597

Source: Waste Data Interrogator, 2023 (Environment Agency)

Figure 4.1: Fate of Waste Exported from Bradford District (2023)



Source: Waste Data Interrogator, 2023 (Environment Agency)

4.5 The WDI 2023 shows that 296 sites and facilities across England received waste that arose in Bradford District (see **Table 4.5**). 113 were in the Yorkshire and Humber whilst 70 were in the North West, 33 in the West Midlands and 27 in the East Midlands. The WPA with the largest number of sites receiving waste was Leeds (25 sites/facilities) followed by Lancashire (16 sites/facilities).

Table 4.5: Location and Number of Facilities Receiving Waste from Bradford District in 2023 (By Region and Waste Planning Authority)

Facility Region	Number of Facilities	Facility WPA	Number of Facilities
East Midlands	27	City of Derby	1
		Derbyshire	9
		Leicester City	1
		Leicestershire	2
		Lincolnshire	4

		North Northamptonshire	3
		Nottingham	2
		Nottinghamshire	4
		West Northamptonshire	1
East of England	11	Bedford	2
		Cambridgeshire	2
		Essex	4
		Hertfordshire	1
		Peterborough	1
		Thurrock	1
London	4	Barking & Dagenham	1
		Bexley	1
		Ealing	1
		Waltham Forest	1
North East	24	Darlington	1
		Gateshead	3
		Hartlepool	3
		Middlesbrough	1
		Northumberland	1
		Redcar & Cleveland	3
		South Tyneside	1
		Stockton on Tees	9
		Sunderland	2
North West	70	Blackburn with Darwen	2
		Bolton	4
		Bury	4
		Cheshire East	3

		Cheshire West & Chester	3
		Cumberland	1
		Halton	1
		Knowsley	4
		Lancashire	16
		Liverpool	6
		Manchester	4
		Oldham	1
		Salford	4
		St. Helens	2
		Stockport	1
		Tameside	3
		Trafford	9
		Wigan	2
South East	6	Buckinghamshire	1
		Hampshire	2
		Isle of Wight	1
		Kent	2
South West	7	Bristol	2
		Gloucestershire	2
		North Somerset	1
		Somerset	2
West Midlands	33	Birmingham	5
		Coventry	1
		Dudley	1
		Herefordshire	1
		Sandwell	5

		Shropshire	1
		Staffordshire	7
		Stoke on Trent	1
		Telford & Wrekin	2
		Walsall	5
		Warwickshire	2
		Worcestershire	2
Yorkshire & Humber	113	Barnsley	5
		Calderdale	9
		Doncaster	4
		East Riding of Yorkshire	4
		Kingston upon Hull	8
		Kirklees	9
		Leeds	25
		North East Lincolnshire	4
		North Lincolnshire	3
		North Yorkshire	8
		Rotherham	13
		Sheffield	10
		Wakefield	9
		York	2
Mobile Plant	1	Mobile Plant	1

Source: Waste Data Interrogator, 2023 (Environment Agency)

- 4.6 38 sites/facilities received over 1,000 tonnes of exported waste from Bradford District including 5 that received more than 10,000 tonnes. The site/facility receiving the largest amount – 88,963 tonnes – was the Valley Road Material Recycling Facility in the Stourton area of Leeds which is owned and operated by Associated Waste Management Ltd. **Table 4.6** lists the ten sites receiving the largest quantities of waste from Bradford District.

Table 4.6: Top 10 Sites Receiving Waste Exported From Bradford District in 2023

Site Name	Facility Type	Waste Planning Authority	Tonnage Received
A W M Valley Road Material Recycling Facility	Non-Hazardous Transfer/Treatment	Leeds	88,962.89
Whitelocks	Inert Waste Transfer/Treatment	North Yorkshire	20,860.00
B W Skip Hire	Vehicle Depollution Facility	Leeds	17,643.81
J.G. Pears Power (O&M) Ltd	Animal By-Products Incinerator	Nottinghamshire	13,403.94
Copper Hill Industrial Estate	Non-Hazardous Waste Transfer	Lincolnshire	10,068.48
Stainland Board Mill	Paper, Pulp & Board Manufacturing Activities	Calderdale	9,186.00
Bradley Park Landfill	Hazardous Merchant Landfill	Kirklees	9,008.52
Alfreton Recycling Centre	Hazardous Waste Transfer/Treatment	Derbyshire	8,379.84
Welbeck Landfill Site	Non-Hazardous Landfill	Wakefield	8,029.98
S. Norton & Co Ltd	Metal Recycling	Liverpool	7,915.26

Source: Waste Data Interrogator, 2023 (Environment Agency)

- 4.7 In respect of the different waste streams/types, the Valley Road facility in Leeds received the largest quantity of Household, Industrial and Commercial Waste (88,963 tonnes), whilst the Welbeck Landfill site in the Wakefield area received the largest quantity of Hazardous Waste (2,263 tonnes) with the Whitelocks site in North Yorkshire received the largest amount of Inert/Construction & Demolition Waste (20,680 tonnes). **Table 4.7** lists the ten sites receiving the largest quantities of waste from Bradford District by waste type.

Table 4.7: Top 10 Sites Receiving Waste Exported From Bradford District in 2023 (by Waste Type)

Household, Industrial & Commercial Waste	Facility Type	Waste Planning Authority	Tonnage Received
Valley Road Materials Recycling Facility	Non-Hazardous Transfer/Treatment	Leeds	88,962.89
J.G. Pears Power (O&M) Ltd	Animal By-Products Incinerator	Nottinghamshire	13,403.94
Copper Hill Industrial Estate	Non-Hazardous Waste Transfer	Lincolnshire	10,068.48
Stainland Board Mill	Paper, Pulp & Board Manufacturing Activities	Calderdale	9,186.00

Alfreton Centre Recycling	Hazardous Waste Transfer/Treatment	Derbyshire	8,379.84
B W Skip Hire	Vehicle Depollution Facility	Leeds	8,007.38
S. Norton & Co	Metal Recycling	Liverpool	7,905.95
Hazel Lane Quarry	Non-Hazardous Landfill	Doncaster	7,040.60
Kemsley Paper Mill	Paper, Pulp & Board Manufacturing Activities	Kent	6,620.54
H.W. Martin Waste Ltd	Non-Hazardous Waste Transfer	Leeds	6,370.81
Hazardous Waste	Facility Type	Waste Planning Authority	Tonnage Received
Welbeck Landfill Site	Non-Hazardous Landfill	Wakefield	2,262.76
Milnsbridge AATF	WEEE Treatment Facility	Kirklees	1,896.99
Ellesmere Port Incinerator	Hazardous Waste Incinerator	Cheshire West & Chester	1,664.14
Bankfield House	Metal Recycling	Liverpool	1,140.72
C. O'Donovan & Sons Ltd	Physical-Chemical Treatment	Leeds	982.68
Earls Barton Fridge Recycling Facility	Non-Specified Treatment	North Northamptonshire	844.41
Tradebe Heysham Ltd	Incineration	Lancashire	754.56
ERQ – STC	Physical-Chemical Treatment	Sandwell	537.00
Rotherham Waste Oils	Hazardous Waste Transfer	Rotherham	507.27
Whitemoss Landfill	Hazardous Merchant Landfill	Lancashire	446.28
Inert/Construction & Demolition Waste	Facility Type	Waste Planning Authority	Tonnage Received
Whitelocks	Inert Waste Transfer/Treatment	North Yorkshire	20,860.00
B W Skip Hire	Vehicle Depollution Facility	Leeds	9,636.43
Bradley Park Landfill	Hazardous Merchant Landfill	Kirklees	8,776.54
Willowbridge Lane Aggregates Recycling Facility	Physical Treatment	Wakefield	5,372.09
Roy Hatfield	Hazardous Waste Transfer	Rotherham	4,414.16
Ashfield Way Treatment & Transfer Station	Inert Waste Transfer/Treatment	Leeds	4,292.49
Hazel Lane Quarry & Landfill	Physical Treatment	Doncaster	3,119.80

Milners Road Site	Non-Hazardous Waste Transfer	Leeds	1,223.80
The Sidings	Non-Hazardous Waste Transfer	Leeds	895.44
Park Lodge Shooting Council	Deposit of Waste to Land (Recovery)	East Riding of Yorkshire	792.00

Source: Waste Data Interrogator, 2023 (Environment Agency)

5 Waste Imports to Bradford District

- 5.1 Waste is also imported to Bradford District to be managed from various parts of the United Kingdom. During 2023, this totalled 661,185 tonnes. Overwhelming this waste is generated within the Yorkshire and Humber region. In 2023, this amounted to around 658,862 tonnes (almost 99%). The next largest volume (around 813 tonnes and around 662 tonnes) came from the East of England and West Midlands regions respectively (see **Table 5.1**).
- 5.2 In relation to the type of waste, the largest quantity was Household, Industrial and Commercial waste. It should be noted that in understanding the levels of waste received at facilities in Bradford District with its origin in the Yorkshire & Humber it needs to be borne in mind that a significant quantity (around 581,572 tonnes/88%) does not have an origin Sub-Region or origin Waste Planning Authority identified in the Waste Data Interrogator. There is potential that some of this unidentified waste may have its origins within the District.

Table 5.1: Origin of Waste Imported to Bradford District (2023) (By Region)

Origin Region	Total (Tonnes)	Household, Industrial, Commercial Waste (Tonnes)	Hazardous Waste (Tonnes)	Inert/C+D Waste (Tonnes)	Percentage (%)
East Midlands	51.17	6.43	44.49	0.25	0.01
East of England	812.85	3.87	717.63	91.35	0.12
London	5.14	0.19	4.58	0.37	0.00
North East	29.48	0.56	28.65	0.27	0.00
North West	395.47	28.29	366.32	0.87	0.06
Northern Ireland	0.00	0.00	0.00	0.00	0.00
Scotland	96.76	1.97	94.51	0.28	0.01
South East	66.68	0.17	66.34	0.17	0.01
South West	82.05	5.94	73.69	2.42	0.01
Wales	91.19	0.92	78.68	11.60	0.01
West Midlands	662.42	16.49	639.85	6.08	0.10
Yorkshire & Humber	658,862.00	392,264.17	7,462.46	259,114.55	99.65
Origin Region Unknown	29.77	14.30	15.47	0.00	0.00

Total	661,184.98	392,343.29	9,592.67	259,228.20	100.00
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Source: Waste Data Interrogator, 2023 (Environment Agency)

5.3 **Table 5.2** and **Table 5.3** sets out the sub-regions and Waste Planning Authorities around the UK where the waste imported to facilities in Bradford District arose from. The largest quantity arose in the Yorkshire and Humber region, however its origin sub-region and WPA is not specified. The next largest quantities arose in the West Yorkshire, South Yorkshire and former Humberside areas.

5.4 In relation to WPAs, the largest quantities of waste were received from Leeds, Rotherham, East Riding of Yorkshire, Wakefield, Kirklees and North East Lincolnshire.

Table 5.2: Origin of Waste Imported to Bradford District (2023) (By Sub-Region)

Origin Region	Origin Sub-Region	Tonnes Received	Household, Industrial & Commercial Waste	Hazardous Waste	Inert/C+D Waste	Percentage
EM	Derbyshire	3.00	3.00	0.00	0.00	0.00
EM	Lincolnshire	10.40	0.00	10.40	0.00	0.00
EM	Northamptonshire	1.50	1.50	0.00	0.00	0.00
EM	Nottinghamshire	5.40	1.50	3.90	0.00	0.00
EM	East Midlands - Sub-Region Uncodeable	30.87	0.43	30.19	0.25	0.00
EE	Cambridgeshire	6.02	0.50	5.52	0.00	0.00
EE	Essex	6.78	0.00	6.78	0.00	0.00
EE	East of England - Sub-Region Uncodeable	800.05	3.37	705.33	91.35	0.12
LDN	London - Sub-Region Uncodeable	5.14	0.19	4.58	0.37	0.00
NE	County Durham	13.56	0.00	13.56	0.00	0.00
NE	Tees Valley Unitary Authorities	2.60	0.00	2.60	0.00	0.00
NE	Tyne & Wear	1.30	0.00	1.30	0.00	0.00
NE	North East - Sub-Region Uncodeable	12.02	0.56	11.19	0.27	0.00
NW	Cheshire	42.97	0.00	42.97	0.00	0.01
NW	Greater Manchester	2.00	2.00	0.00	0.00	0.00
NW	Lancashire	23.47	18.27	5.20	0.00	0.00
NW	Merseyside	6.18	6.18	0.00	0.00	0.00
NW	North West - Sub-Region Uncodeable	320.85	1.84	318.15	0.87	0.05

SCO	Lothian & Borders	25.63	0.00	25.63	0.00	0.00
SCO	Scotland - Sub-Region Uncodeable	71.13	1.97	68.88	0.28	0.01
SE	Berkshire	10.17	0.00	10.17	0.00	0.00
SE	Kent	6.78	0.00	6.78	0.00	0.00
SE	South East - Sub-Region Uncodeable	49.73	0.17	49.39	0.17	0.01
SW	Bath, Bristol & South Gloucestershire	25.73	0.00	25.73	0.00	0.00
SW	South West - Sub-Region Uncodeable	56.32	5.94	47.96	2.42	0.01
WAL	Wales - Sub-Region Uncodeable	91.19	0.92	78.68	11.60	0.01
WM	Staffordshire	0.50	0.50	0.00	0.00	0.00
WM	West Midlands Met Districts	9.76	0.00	9.76	0.00	0.00
WM	West Midlands - Sub-Region Uncodeable	652.16	15.99	630.09	6.08	0.10
YH	Former Humberside	7,678.41	7,678.41	0.00	0.00	1.16
YH	North Yorkshire	180.09	65.69	114.40	0.00	0.03
YH	South Yorkshire	12,324.56	12,010.84	54.49	259.23	1.86
YH	West Yorkshire	57,106.76	49,497.54	26.32	7,582.90	8.64
YH	Yorkshire & Humber - Sub-Region Uncodeable	581,572.19	323,011.70	7,267.25	251,293.24	87.96
UNC	Sub-Region Uncodeable	29.77	14.23	15.47	0.00	0.00
Total		661,184.98	392,343.24	9,592.67	259,249.03	100

Source: Waste Data Interrogator, 2023 (Environment Agency)

Table 5.3: Origin of Waste Imported to Bradford District (2023) (by Waste Planning Authority)

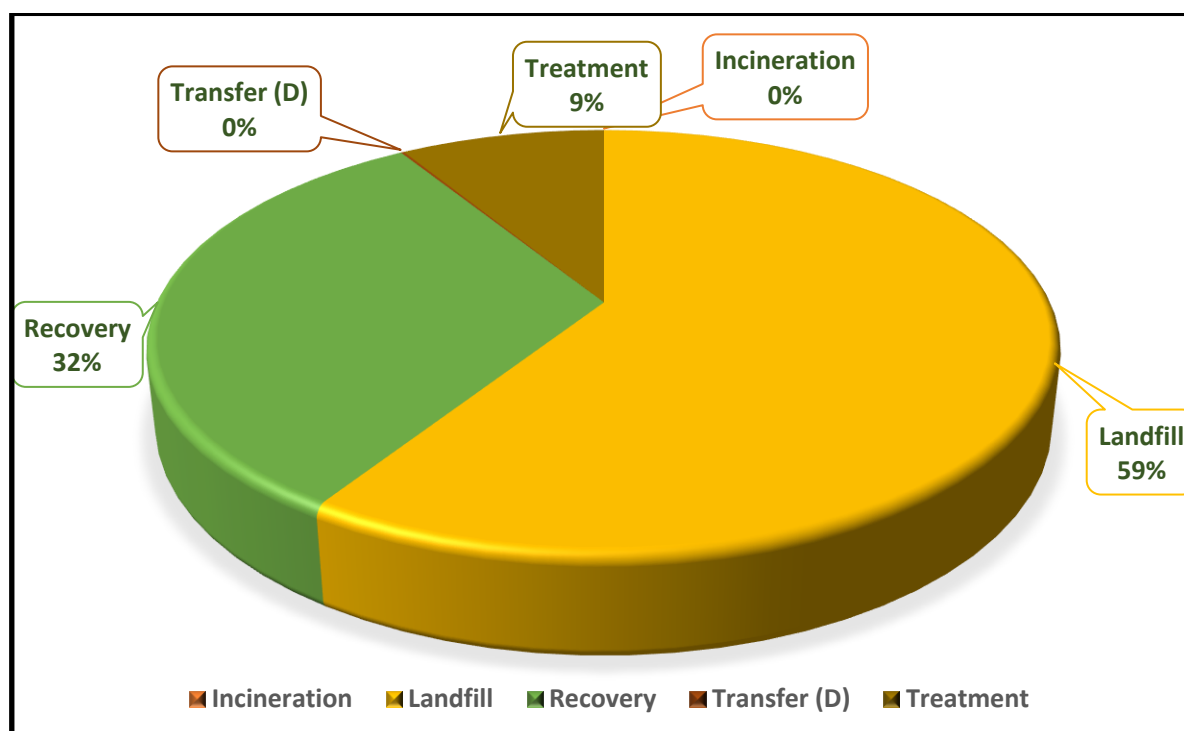
Origin Region	Origin Waste Planning Authority	Tonnes Received	Household, Industrial & Commercial Waste	Hazardous Waste	Inert/C+D Waste	Percentage
EM	Derbyshire	3.00	3.00	0.00	0.00	0.00
EM	Lincolnshire	10.40	0.00	10.40	0.00	0.00
EM	Nottinghamshire	5.40	1.50	3.90	0.00	11.02
EM	West Northamptonshire	1.50	1.50	0.00	0.00	0.00

EM	East Midlands - WPA Not Codeable	30.87	0.43	30.19	0.25	0.00
EE	Cambridgeshire	1.63	0.50	1.13	0.00	0.00
EE	Essex	6.78	0.00	6.78	0.00	0.00
EE	Peterborough	4.39	0.00	4.39	0.00	0.00
EE	East of England - WPA Not Codeable	800.05	3.37	705.33	91.35	0.12
LDN	London - WPA Not Codeable	5.14	0.19	4.58	0.37	0.00
NE	County Durham	13.56	0.00	13.56	0.00	0.00
NE	Middlesbrough	2.60	0.00	2.60	0.00	0.00
NE	Newcastle upon Tyne	1.30	0.00	1.30	0.00	0.00
NE	North East - WPA Not Codeable	12.02	0.56	11.19	0.27	0.00
NW	Chester West & Chester	42.97	0.00	42.97	0.00	0.01
NW	Lancashire	23.47	18.27	5.20	0.00	0.00
NW	Manchester	2.00	2.00	0.00	0.00	0.00
NW	Merseyside - WPA Not Codeable	6.18	6.18	0.00	0.00	0.00
NW	North West - WPA Not Codeable	320.85	1.84	318.15	0.87	0.05
SCO	City of Edinburgh	22.60	0.00	22.60	0.00	0.00
SCO	West Lothian	3.03	0.00	3.03	0.00	0.00
SCO	Scotland - WPA Not Codeable	71.13	1.97	68.88	0.28	0.01
SE	Berkshire - WPA Not Codeable	1.13	0.00	1.13	0.00	0.00
SE	Reading	9.04	0.00	9.04	0.00	0.00
SE	Kent	6.78	0.00	6.78	0.00	0.00
SE	South East - WPA Not Codeable	49.73	0.17	49.39	0.17	0.01
SW	Bath & North East Somerset	10.04	0.00	10.04	0.00	0.00
SW	Bristol City	15.69	0.00	15.69	0.00	0.00
SW	South West - WPA Not Codeable	56.32	5.94	47.96	2.42	0.01
WAL	Wales - WPA Not Codeable	91.19	0.92	78.68	11.60	0.01

WM	Staffordshire	0.50	0.50	0.00	0.00	0.00
WM	Wolverhampton	9.76	0.00	9.76	0.00	0.00
WM	West Midlands - WPA Not Codeable	652.16	15.99	630.09	6.08	0.10
YH	Calderdale	482.28	301.28	0.00	181.00	0.07
YH	Doncaster	54.49	0.00	54.49	0.00	0.01
YH	East Riding of Yorkshire	5,160.53	5,160.53	0.00	0.00	0.78
YH	Kingston upon Hull	1.00	1.00	0.00	0.00	0.00
YH	Kirklees	2,680.95	1,491.55	9.42	1,179.98	0.41
YH	Leeds	50,365.89	47,072.29	9.10	3,284.50	7.62
YH	North East Lincolnshire	2,516.88	2,516.88	0.00	0.00	0.38
YH	North Yorkshire	51.06	18.32	32.74	0.00	0.01
YH	Rotherham	11,816.92	11,816.92	0.00	0.00	1.79
YH	Sheffield	453.15	193.92	0.00	259.23	0.07
YH	Wakefield	3,577.64	632.42	7.80	2,937.42	0.54
YH	York	129.03	47.37	81.66	0.00	0.02
YH	Yorkshire & Humber - WPA Not Codeable	581,572.19	323,011.70	7,267.25	251,293.24	87.96
UNC	WPA Not Codeable	29.77	14.30	15.47	0.00	0.00

- 5.3. In relation to the fate of waste imported to Bradford District from other areas, the majority (59%) was received at landfill facilities with 32% being received at recovery facilities (see 5.4. **Figure 5.1**).

Figure 5.1: Fate of Waste Imported to Bradford District (2023)



Source: Waste Data Interrogator, 2023 (Environment Agency)

- 5.5. The WDI 2023 shows that 32 sites and facilities within Bradford District received waste from other parts of the UK. As highlighted in **Table 5.1** (above) most of this waste arose in the wider Yorkshire and Humber region. Of the sites/facilities, 15 received more than 10,000 tonnes. The sites receiving the most waste from other areas were the Esholt Waste Water Treatment Works (150,873 tonnes), Hallas Rough Quarry Recycling Facility (94,296 tonnes), European Metal Recycling in Bradford (66,244 tonnes), Hallas Rough Quarry Landfill (40,013 tonnes) and Esholt Waste Water Treatment Works Composting Facility (45,102 tonnes).

6 Hazardous Waste Movements

- 6.1 Hazardous waste arisings and movements are recorded both within the Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI). The former is more detailed as it includes information about which sites/facilities receive and export the waste, whilst the latter only provides details of destinations and origins of the waste. In addition, there is often some discrepancies between the quantities of waste show in each interrogator.
- 6.2 In 2023, the WDI showed that a total of 20,879 tonnes of hazardous waste arose in Bradford District. Of this total 1,782 tonnes (9%) was managed at facilities within the District. The remainder, 19,097 tonnes (91%) was exported to other parts of the country. As well as hazardous waste arising within the District, a total of 9,593 tonnes were imported. The HWDI 2023 showed that 22,444 tonnes of hazardous waste arose in Bradford District, of which 21,482 tonnes (96%) was exported to other areas with 963 tonnes being managed locally. 2,892 tonnes of hazardous waste were imported to Bradford from other Waste Planning Authority areas during 2023.

6.3 For the purposes of defining hazardous waste movements in this part of the report, the HWDI has been used as the primary source of information. Details of the hazardous waste exported and imported and recorded within the WDI is set out the section above.

6.4 **Table 6.1** shows the tonnages exported to other regions of England between 2021 and 2023. Three quarters (just over 75%) of hazardous waste was exported to facilities in the North West (around 40%) and Yorkshire and Humber (around 36%), whilst just over 10% was managed at facilities in the West Midlands. This was a different pattern to 2022, where the largest quantity of waste was exported to the North West (around 47%), with just over 26% sent to facilities in the Yorkshire and Humber region and around 8% to the West Midlands. 2021 was similar, although just under 11% was sent to the East Midlands.

Table 6.1: Destination of Hazardous Waste Exported from Bradford District (2021 to 2023) (By Region)

Deposit Region	2021		2022		2023	
	Tonnage	%	Tonnage	%	Tonnage	%
East Midlands	2,316	10.8	2,272	11.7	1,625	7.6
East of England	742	3.5	53	0.3	61	0.3
London	39	0.2	3	0	7	0
North East	662	3.1	878	4.5	838	3.9
North West	10,309	48	9,044	46.7	8,476	39.5
South East	460	2.1	471	2.4	412	1.9
South West	242	1.1	38	0.2	14	0.1
West Midlands	763	3.6	1,463	7.6	2,279	10.6
Yorkshire & Humber*	5,937	27.7	5,129	26.5	7,769	36.2
Totals	21,470	100	19,349	100	21,482	100

* Not including City of Bradford Metropolitan District Council area

Source: Hazardous Waste Data Interrogator, 2021 to 2023 (Environment Agency)

6.5 **Table 6.2** provides a breakdown of destinations by sub-region of hazardous waste arising in Bradford District. The largest quantities were exported to waste planning authorities in Cheshire, West Yorkshire, Merseyside, Lancashire, South Yorkshire, Nottinghamshire and Greater Manchester.

Table 6.2: Destination of Hazardous Waste Exported from Bradford District (2021 to 2023) (By Sub-Region)

Deposit Region	Deposit Sub-Region	2021		2022		2023	
		Tonnage	%	Tonnage	%	Tonnage	%
EM	Derbyshire	919	4	668	3	823	4

EM	Leicestershire	58	0	131	1	4	0
EM	Lincolnshire	0	0	7	0	40	0
EM	Northamptonshire	34	0	289	1	46	0
EM	Nottinghamshire	1,305	6	1,176	6	713	3
EE	Bedfordshire	3	0	5	0	11	0
EE	Cambridgeshire	16	0	27	0	23	0
EE	Essex	12	0	8	0	3	0
EE	Hertfordshire	710	3	12	0	22	0
EE	Norfolk	0	0	2	0	2	0
EE	Suffolk	1	0	0.00	0	0	0
LDN	East London Waste Authority	5	0	3	0	0	0
LDN	South East London	34	0	0	0	7	0
LDN	West London Waste Authority	0	0	0	0	0	0
NE	County Durham	3	0	16	0	53	0
NE	Northumberland	0	0	1	0	1	0
NE	Tees Valley Unitary Authorities	650	3	845	4	742	3
NE	Tyne & Wear	8	0	16	0	42	0
NW	Cheshire	4,394	20	2,978	15	2,002	9
NW	Greater Manchester	1,120	5	1,063	5	946	4
NW	Lancashire	2,298	11	2,796	14	3,207	15
NW	Merseyside	2,496	12	2,207	11	2,322	11
SE	Berkshire	0	0	0	0	0	0
SE	Buckinghamshire	0	0	1	0	0	0
SE	East Sussex	249	1	248	1	364	2
SE	Hampshire	26	0	183	1	25	0
SE	Isle of Wight	0	0	0	0	0	0

SE	Kent	0	0	0	0	0	0
SE	Oxfordshire	1	0	1	0	0	0
SE	Surrey	184	1	38	0	23	0
SE	West Sussex	0	0	0	0	0	0
SW	Bath, Bristol & South Glos	239	1	33	0	4	0
SW	Devon	0	0	0	0	0	0
SW	Dorset	2	0	3	0	1	0
SW	Gloucestershire	0	0	1	0	8	0
SW	Wiltshire	0	0	1	0	0	0
WM	Herefordshire	0	0	0	0	0	0
WM	Shropshire	1	0	3	0	6	0
WM	Staffordshire	373	2	410	2	1,276	6
WM	Warwickshire	11	0	11	0	7	0
WM	West Midlands Met Districts	360	2	947	5	940	4
WM	Worcestershire	18	0	93	0	51	0
YH	Former Humberside	65	0	338	2	353	2
YH	North Yorkshire	102	0	184	1	206	1
YH	South Yorkshire	1,418	7	1,224	6	1,286	6
YH	West Yorkshire*	4,352	20	3,383	17	5,924	28
Totals		21,470	100	19,349	100	24,482	100

* Not including City of Bradford Metropolitan District Council

Source: Hazardous Waste Data Interrogator, 2021 to 2023 (Environment Agency)

6.6

6.7 **Table 6.3** provides an overview of which Waste Planning Authorities received hazardous waste from Bradford District to be managed. In 2023, around 16% was exported to Wakefield, around 15% to Lancashire, around 8% to Cheshire West & Chester, 7% to Liverpool, 6% to Kirklees, and just over 5% to Leeds and Stoke on Trent, respectively. Lower percentages were exported to Derbyshire (3.75%), Rotherham (3%), Sandwell (3%) and Nottingham (around 3%). Smaller quantities were exported to other waste planning authorities in the wider Yorkshire & Humber region as well as other parts of England.

**Table 6.3: Destination of Hazardous Waste Exported from Bradford District (2021 to 2023)
(By Waste Planning Authority)**

Deposit Region	Deposit WPA	2021		2022		2023	
		Tonnage	%	Tonnage	%	Tonnage	%
EM	City of Derby	10	0.05	17	0.09	13	0.06
EM	Derbyshire	909	4.23	651	3.37	810	3.75
EM	Leicester City	1	0.00	0	0.00	0	0.00
EM	Leicestershire	57	0.27	131	0.68	4	0.02
EM	Lincolnshire	0.3	0.00	7	0.04	40	0.18
EM	Northamptonshire	34	0.16	0	0.00	0	0.00
EM	North Northamptonshire*			289	1.50	46	0.21
EM	Nottingham City	1,149	5.35	1,065	5.52	624	2.89
EM	Nottinghamshire	156	0.73	111	0.57	89	0.41
EE	Bedford	3	0.01	5	0.02	11	0.05
EE	Cambridgeshire	16	0.07	27	0.14	11	0.05
EE	Essex	12	0.06	8	0.04	3	0.01
EE	Hertfordshire	710	3.31	12	0.06	22	0.10
EE	Norfolk	0	0	2	0.01	2	0.01
EE	Peterborough	0	0.00	0	0.00	13	0.06
EE	Suffolk	1	0.00	0	0.00	0	0.00
EE	Thurrock	0	0.00	0	0.00	0	0.00
LDN	Bexley	34	0.16	0	0.00	7	0.03
LDN	Havering	0	0.00	3	0.01	0	0.00
LDN	Hounslow	0.2	0.00	0	0.00	0	0.00
NE	County Durham	3	0.01	16	0.08	53	0.25
NE	Darlington	21	0.10	77	0.40	25	0.11

NE	Gateshead	2	0.01	4	0.02	40	0.19
NE	Hartlepool	0	0.00	26	0.13	0	0.00
NE	Middlesbrough	0.3	0.00	0	0.00	0	0.00
NE	North Tyneside	5	0.02	11	0.06	1	0.00
NE	Northumberland	0.5	0.00	1	0.00	1	0.00
NE	Redcar & Cleveland	280	1.30	174	0.90	180	0.83
NE	South Tyneside	1	0.00	0	0.00	1	0.00
NE	Stockton on Tees	349	1.63	569	2.95	537	2.48
NE	Sunderland	0	0.00	0	0.00	1	0.00
NW	Blackburn with Darwen	1	0.00	6	0.03	6	0.03
NW	Bolton	46	0.21	92	0.48	89	0.41
NW	Bury	56	0.26	71	0.37	179	0.83
NW	Cheshire East	2,055	9.57	1,227	6.36	215	1.00
NW	Cheshire West & Chester	2,339	10.89	1,750	9.07	1,785	8.26
NW	Halton	2	0.01	14	0.07	1	0.00
NW	Knowsley	376	1.75	148	0.77	328	1.52
NW	Lancashire	2,298	10.70	2,790	14.46	3,202	14.81
NW	Liverpool	1,792	8.35	1,628	8.44	1,515	7.01
NW	Manchester	3	0.01	102	0.53	41	0.19
NW	Oldham	1	0.00	0	0.00	1	0.01
NW	Rochdale	0	0.00	0	0.00	0	0.00
NW	Salford	477	2.22	450	2.33	389	1.80
NW	Sefton	119	0.55	153	0.79	207	0.96
NW	St Helens	35	0.16	103	0.53	80	0.37
NW	Stockport	24	0.11	28	0.15	20	0.09
NW	Tameside	29	0.14	26	0.14	58	0.27

NW	Trafford	483	2.25	292	1.51	168	0.78
NW	Warrington	0.2	0.00	0	0.00	1	0.00
NW	Wigan	2	0.01	1	0.00	1	0.00
NW	Wirral	173	0.81	161	0.83	191	0.88
SE	Buckinghamshire	0	0.00	100	0.00	0	0.00
SE	East Sussex	249	1.16	248	1.29	364	1.68
SE	Hampshire	26	0.12	183	0.95	25	0.11
SE	Isle of Wight	0	0.00	0	0.00	0	0.00
SE	Kent	0	0.00	0	0.00	0	0.00
SE	Medway	0	0.00	0	0.00	0	0.00
SE	Milton Keynes	0	0.00	0	0.00	0	0.00
SE	Oxfordshire	1	0.00	1	0.00	0	0.00
SE	Slough	0	0.00	0	0.00	0	0.00
SE	Surrey	184	0.86	38	0.20	23	0.11
SE	West Sussex	0	0.00	0	0.00	0	0.00
SE	Windsor & Maidenhead	0	0.00	0	0.00	0	0.00
SE	Wokingham	0	0.00	0	0.00	0	0.00
SW	Bath & North East Somerset	0	0.00	0	0.00	0	0.00
SW	Bristol City	236	1.10	26	0.14	1	0.01
SW	Devon	0.1	0.00	0	0.00	0	0.00
SW	Dorset	2	0.01	3	0.01	1	0.00
SW	Gloucestershire	0	0.00	1	0.01	8	0.04
SW	North Somerset	3	0.01	7	0.04	3	0.01
SW	Plymouth	0	0.00	0	0.00	0	0.00
SW	South Gloucestershire			0	0.00	0	0.00
SW	Wiltshire	0	0.00	1	0.00	0	0.00

WM	Birmingham	38	0.18	7	0.04	1	0.00
WM	Dudley	5	0.02	0	0.00	43	0.20
WM	Herefordshire	0	0.00	0	0.00	0	0.00
WM	Sandwell	9	0.04	4	0.02	697	3.22
WM	Staffordshire	136	0.63	181	0.94	95	0.44
WM	Stoke on Trent	237	1.10	229	1.18	1,181	5.46
WM	Telford & Wrekin	1	0.00	3	0.01	6	0.03
WM	Walsall	308	1.43	313	1.62	199	0.92
WM	Warwickshire	11	0.05	11	0.06	7	0.03
WM	Wolverhampton	0.1	0.00	623	3.23	0	0.00
WM	Worcestershire	18	0.08	93	0.48	51	0.24
YH	Barnsley	32	0.15	20	0.10	71	0.33
YH	Calderdale	3	0.01	4	0.02	50	0.23
YH	Doncaster	20	0.09	9	0.05	33	0.15
YH	East Riding of Yorkshire	0.3	0.00	2	0.01	0	0.00
YH	Kingston upon Hull	7	0.03	53	0.28	24	0.11
YH	Kirklees	2,326	10.83	1,597	8.28	1,336	6.18
YH	Leeds	1,126	5.24	1,435	7.44	1,137	5.26
YH	North East Lincolnshire	5	0.02	263	1.36	281	1.30
YH	North Lincolnshire	53	0.25	20	0.10	48	0.22
YH	North Yorkshire	20	0.09	92	0.48	104	0.48
YH	Rotherham	1,068	4.97	867	4.49	732	3.39
YH	Sheffield	297	1.38	328	1.70	450	2.08
YH	Wakefield	897	4.18	347	1.80	3,402	15.74
YH	York	81	0.38	92	0.48	102	0.47
Totals		21,470	100	19,349	100	21,482	100

Source: Hazardous Waste Data Interrogator, 2021 to 2023 (Environment Agency)

6.8 As mentioned in paragraph 6.2, a total of 2,888 tonnes of hazardous waste was imported to Bradford District from other areas during 2023. This was compared to 309 tonnes in 2021 and 586 tonnes in 2022. Many of the imports consist of very small tonnages, often in single figures or less.

6.9 **Table 6.4** shows that the largest quantities of hazardous waste originated in the Yorkshire and Humber (48%), West Midlands (15%), East of England (14%) and North West (11%) regions. In terms of sub-regions, the largest amounts (in 2023) were received from West Yorkshire (34%), Staffordshire (14%), Essex (13%). Lancashire (9%) and North Yorkshire (9%) (see

6.10 **Table 6.5**). In relation to individual WPAs, the largest amounts of hazardous waste originated in Staffordshire (14%), Kirklees (14%), Essex (13%), Leeds (12%), Lancashire (9%), York (7%) and Calderdale (7%) (see **Table 6.6**).

6.11 None of the identified 2023 movements were above the threshold to be defined as strategic hazardous waste movements.

Table 6.4: Origin of Hazardous Waste Imported to Bradford District (2021 to 2023) (By Region)

Origin Region	2021		2022		2023	
	Tonnage	%	Tonnage	%	Tonnage	%
East Midlands	3	1	0	0	127	4
East of England	10	3	82	14	414	14
London	3	1	1	0	3	0
North East	4	1	12	2	7	0
North West	29	9	10	2	319	11
Scotland	13	4	4	1	45	2
South East	11	4	6	1	50	2
South West	6	2	14	2	26	1
Wales	11	4	12	2	97	3
West Midlands	6	2	17	3	427	15
Yorkshire & Humber	213	69	428	73	1,373	48
Unknown Origin	0	0	1	0	0	0
Totals	309	100	586	100	2,888	100

Source: Hazardous Waste Data Interrogator, 2021 to 2023 (Environment Agency)

Table 6.5: Origin of Hazardous Waste Imported to Bradford District (2021 to 2023) (By Sub-Region)

Origin Region	Origin Sub-Region	2021		2022		2023	
		Tonnage	%	Tonnage	%	Tonnage	%
EM	Derbyshire	0.96	0.31	0.00	0.00	13.33	0.46
EM	Leicestershire	0.69	0.22	0.08	0.01	0.72	0.02
EM	Lincolnshire	0.32	0.10	0.00	0.00	89.00	3.08
EM	Northamptonshire	0.84	0.27	0.00	0.00	1.04	0.04
EM	Nottinghamshire	0.34	0.11	0.20	0.03	22.72	0.79
EE	Bedfordshire	0.80	0.26	9.16	1.56	12.26	0.42
EE	Cambridgeshire	0.33	0.11	1.13	0.19	3.46	0.12
EE	Essex	3.92	1.28	38.91	6.64	383.11	13.27
EE	Hertfordshire	1.50	0.49	0.71	0.12	0.21	0.01
EE	Norfolk	1.93	0.63	31.73	5.41	14.84	0.51
EE	Suffolk	1.08	0.35	0.00	0.00	0.36	0.01
LDN	Central London	0.38	0.12	0.77	0.13	0.30	0.01
LDN	East London Waste Authority	0.09	0.03	0.03	0.01	0.00	0.00
LDN	North London Waste Authority	0.25	0.08	0.00	0.00	0.04	0.00
LDN	South East London	0.59	0.19	0.00	0.00	0.04	0.00
LDN	South London	0.71	0.23	0.01	0.00	1.99	0.07
LDN	West London Waste Authority	1.13	0.37	0.09	0.02	0.33	0.01
LDN	Western Riverside Waste Authority	0.00	0.00	0.00	0.00	0.36	0.01
NE	County Durham	2.47	0.80	6.79	1.16	2.47	1.76
NE	Northumberland	0.01	0.00	0.00	0.00	0.01	1.08
NE	Tees Valley Unitary Authorities	1.30	0.42	5.20	0.89	1.30	3.41
NE	Tyne & Wear	0.62	0.20	0.00	0.00	0.62	0.64
NW	Cheshire	24.64	8.03	8.87	1.51	6.64	0.23
NW	Cumbria	1.17	0.38	0.00	0.00	0.50	0.02
NW	Greater Manchester	1.64	0.53	0.00	0.00	36.16	1.25

NW	Lancashire	1.16	0.38	1.49	0.25	270.78	9.38
NW	Merseyside	0.32	0.10	0.00	0.00	4.92	0.17
SCO	Ayrshire, Dumfries & Galloway	1.17	0.38	0.00	0.00	0.03	0.00
SCO	Forth Valley	1.27	0.41	0.00	0.00	1.71	0.06
SCO	Glasgow & Clyde Valley	7.23	2.35	0.00	0.00	10.13	0.35
SCO	Lothian & Borders	1.39	0.45	3.57	0.61	4.67	0.16
SCO	North East	0.39	0.13	0.00	0.00	18.60	0.64
SCO	Orkney & Shetland	0.00	0.00	0.00	0.00	0.00	0.00
SCO	Tayside	0.60	0.20	0.00	0.00	0.01	0.00
SCO	Highlands & Islands	1.20	0.39	0.00	0.00	9.54	0.33
SE	Berkshire	0.18	0.06	3.47	0.59	7.68	0.27
SE	Buckinghamshire	0.99	0.32	0.00	0.00	3.18	0.11
SE	East Sussex	0.14	0.05	0.00	0.00	0.00	0.00
SE	Hampshire	3.02	0.98	0.00	0.00	0.01	0.00
SE	Kent	2.48	0.81	2.26	0.39	2.51	0.09
SE	Oxfordshire	0.15	0.05	0.00	0.00	0.00	0.00
SE	Surrey	1.42	0.46	0.01	0.00	12.69	0.44
SE	West Sussex	2.42	0.79	0.04	0.01	23.70	0.82
SW	Bath, Bristol & South Glos	0.59	0.19	3.52	0.60	15.66	0.54
SW	Cornwall	0.17	0.06	0.00	0.00	2.43	0.08
SW	Devon	0.44	0.14	0.20	0.03	2.03	0.07
SW	Dorset	2.31	0.75	0.00	0.00	0.03	0.00
SW	Gloucestershire	0.75	0.24	0.00	0.00	0.00	0.00
SW	Somerset	0.72	0.23	0.00	0.00	3.36	0.12
SW	Wiltshire	0.73	0.24	10.17	1.73	2.37	0.08
WAL	North Wales	4.25	1.38	11.62	1.98	17.48	0.61
WAL	South East Wales	6.55	2.13	0.00	0.00	72.55	2.51
WAL	South West Wales	0.00	0.00	0.00	0.00	7.07	0.24
WM	Herefordshire	1.10	0.36	0.00	0.00	0.00	0.00
WM	Shropshire	0.10	0.03	0.00	0.00	0.00	0.00
WM	Staffordshire	0.40	0.13	13.63	2.32	417.67	14.46
WM	Warwickshire	1.75	0.57	0.00	0.00	0.00	0.00

WM	West Midlands Met Districts	1.75	0.57	3.13	0.53	8.61	0.30
WM	Worcestershire	0.87	0.28	0.16	0.03	0.90	0.03
YH	Former Humberside	41.87	13.64	102.93	17.55	82.06	2.84
YH	North Yorkshire	5.09	1.66	82.90	14.14	266.81	9.24
YH	South Yorkshire	17.43	5.68	1.71	0.29	38.74	1.34
YH	West Yorkshire	148.46	48.36	240.75	41.06	985.75	34.13
UO	Unknown Origin	0.06	0.02	1.13	0.19	0.14	0.00
Totals		308.57	100	586.35	100	2,888.12	100

Source: Hazardous Waste Data Interrogator, 2021 to 2023 (Environment Agency)

Table 6.6: Origin of Hazardous Waste Imported to Bradford District (2021 to 2023) (By Waste Planning Authority)

Origin Region	Origin WPA	2021		2022		2023	
		Tonnage	%	Tonnage	%	Tonnage	%
EM	City of Derby	0.05	0.02	0.00	0.00	5.97	0.21
EM	Derbyshire	0.91	0.29	0.00	0.00	7.36	0.25
EM	Leicester City	0.08	0.03	0.00	0.00	0.00	0.00
EM	Leicestershire	0.61	0.20	0.08	0.01	0.72	0.02
EM	Lincolnshire	0.32	0.10	0.00	0.00	89.00	3.08
EM	North Northamptonshire	0.84	0.27	0.00	0.00	1.04	0.04
EM	Nottingham City	0.06	0.02	0.00	0.00	22.68	0.79
EM	Nottinghamshire	0.28	0.09	0.20	0.03	0.04	0.00
EE	Bedford	0.03	0.01	0.00	0.00	0.00	0.00
EE	Cambridgeshire	0.21	0.07	1.13	0.19	2.23	0.08
EE	Central Bedfordshire	0.00	0.00	9.16	1.58	11.62	0.40
EE	Essex	2.40	0.78	38.91	6.70	383.11	13.27
EE	Hertfordshire	1.29	0.42	0.71	0.12	0.21	0.01
EE	Luton	0.00	0.00	0.00	0.00	0.64	0.02

EE	Norfolk	1.93	0.63	31.73	5.47	14.84	0.51
EE	Peterborough	0.12	0.04	0.00	0.00	1.23	0.04
EE	Southend on Sea	0.00	0.00	0.00	0.00	0.00	0.00
EE	Suffolk	1.08	0.35	0.00	0.00	0.36	0.01
EE	Thurrock	1.52	0.49	0.00	0.00	0.00	0.00
LDN	Barking & Dagenham	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Barnet	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Bexley	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Brent	0.00	0.00	0.00	0.00	0.32	0.00
LDN	Bromley	0.00	0.00	0.00	0.00	0.00	0.00
LDN	City of London	0.02	0.01	0.35	0.06	0.26	0.01
LDN	Croydon	0.00	0.00	0.00	0.00	1.75	0.06
LDN	Ealing	0.06	0.02	0.00	0.00	0.00	0.00
LDN	Enfield	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Greenwich	0.05	0.02	0.00	0.00	0.02	0.00
LDN	Hammersmith & Fulham	0.00	0.00	0.00	0.00	0.36	0.01
LDN	Haringey	0.25	0.08	0.00	0.00	0.00	0.00
LDN	Harrow	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Havering	0.08	0.03	0.00	0.00	0.00	0.00
LDN	Hillingdon	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Hounslow	0.80	0.26	0.09	0.02	0.01	0.00
LDN	Islington	0.00	0.00	0.00	0.00	0.04	0.00
LDN	Kingston upon Thames	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Lewisham	0.54	0.17	0.00	0.00	0.00	0.00
LDN	Merton	0.00	0.00	0.01	0.00	0.00	0.00
LDN	Newham	0.02	0.00	0.03	0.01	0.00	0.00

LDN	Redbridge	0.00	0.00	0.00	0.00	0.00	0.00
LDN	Richmond upon Thames	0.27	0.09	0.00	0.00	0.00	0.00
LDN	Southwark	0.00	0.00	0.00	0.00	0.02	0.00
LDN	Sutton	0.20	0.06	0.00	0.00	0.24	0.01
LDN	Tower Hamlets	0.33	0.11	0.07	0.01	0.02	0.00
LDN	Westminster	0.03	0.01	0.36	0.06	0.02	0.00
NE	County Durham	2.47	0.80	6.79	1.17	1.76	0.06
NE	Darlington	0.00	0.00	0.00	0.00	0.31	0.01
NE	Gateshead	0.02	0.00	0.00	0.00	0.02	0.00
NE	Hartlepool	0.00	0.00	0.00	0.00	0.00	0.00
NE	Middlesbrough	0.00	0.00	0.00	0.00	0.00	0.00
NE	Newcastle upon Tyne	0.60	0.19	0.00	0.00	0.00	0.00
NE	North Tyneside	0.00	0.00	0.00	0.00	0.18	0.01
NE	Northumberland	0.01	0.00	0.00	0.00	1.08	0.04
NE	Redcar & Cleveland	0.00	0.00	0.00	0.00	0.00	0.00
NE	South Tyneside	0.00	0.00	0.00	0.00	0.03	0.00
NE	Stockton on Tees	1.30	0.42	5.20	0.90	3.10	0.11
NE	Sunderland	0.00	0.00	0.00	0.00	0.41	0.01
NW	Blackburn with Darwen	0.00	0.00	0.00	0.00	0.13	0.00
NW	Blackpool	0.00	0.00	0.00	0.00	0.02	0.00
NW	Bolton	0.00	0.00	0.00	0.00	0.00	0.00
NW	Bury	0.02	0.01	0.00	0.00	0.00	0.00
NW	Cheshire East	24.58	7.98	0.00	0.00	6.42	0.22
NW	Cheshire West & Chester	0.06	0.02	8.87	1.53	0.20	0.01
NW	Cumberland	1.17	0.38	0.00	0.00	0.50	0.02

NW	Halton	0.03	0.01	0.00	0.00	0.00	0.00
NW	Lancashire	1.16	0.38	1.49	0.26	270.63	9.37
NW	Liverpool	0.01	0.00	0.00	0.00	1.02	0.04
NW	Manchester	1.38	0.45	0.00	0.00	5.26	0.18
NW	Oldham	0.00	0.00	0.00	0.00	0.00	0.00
NW	Rochdale	0.13	0.04	0.00	0.00	1.23	0.04
NW	Salford	0.01	0.00	0.00	0.00	4.25	0.15
NW	Sefton	0.28	0.09	0.00	0.00	3.90	0.14
NW	Stockport	0.09	0.03	0.00	0.00	0.31	0.01
NW	Tameside	0.02	0.00	0.00	0.00	0.01	0.00
NW	Trafford	0.00	0.00	0.00	0.00	25.10	0.87
NW	Wigan	0.00	0.00	0.00	0.00	0.00	0.00
NW	Warrington	0.00	0.00	0.00	0.00	0.02	0.00
NW	Wirral	0.00	0.00	0.00	0.00	0.00	0.00
SCO	Aberdeen City	0.00	0.00	0.00	0.00	0.00	0.00
SCO	Aberdeenshire	0.30	0.10	0.00	0.00	0.00	0.00
SCO	Angus	0.60	0.19	0.00	0.00	0.00	0.00
SCO	Argyll & Bute	0.60	0.19	0.00	0.00	0.14	0.00
SCO	City of Edinburgh	0.11	0.03	0.01	0.00	0.04	0.00
SCO	Dumfries & Galloway	1.17	0.38	0.00	0.00	0.03	0.00
SCO	Dundee City	0.00	0.00	0.00	0.00	0.01	0.00
SCO	East Dunbartonshire	0.00	0.00	0.00	0.00	0.00	0.00
SCO	Falkirk	1.26	0.41	0.00	0.00	0.00	0.00
SCO	Fife	0.00	0.00	0.00	0.00	1.71	0.06
SCO	Glasgow City	0.12	0.04	0.00	0.00	0.12	0.00
SCO	Highland	0.60	0.19	0.00	0.00	9.40	0.33

SCO	Midlothian	0.00	0.00	0.00	0.00	0.00	0.00
SCO	Moray	0.09	0.03	0.00	0.00	18.60	0.64
SCO	North Ayrshire	0.00	0.00	0.00	0.00	0.00	0.00
SCO	North Lanarkshire	5.88	1.91	0.00	0.00	9.98	0.35
SCO	Perth & Kinross	0.60	0.19	0.00	0.00	0.00	0.00
SCO	Renfrewshire	1.23	0.40	0.00	0.00	0.00	0.00
SCO	Scottish Borders	0.69	0.22	0.00	0.00	0.00	0.00
SCO	Shetland	0.00	0.00	0.00	0.00	0.00	0.00
SCO	South Ayrshire	0.00	0.00	0.00	0.00	0.00	0.00
SCO	South Lanarkshire	0.00	0.00	0.00	0.00	0.03	0.00
SCO	Stirling	0.01	0.00	0.00	0.00	0.00	0.00
SE	West Lothian	0.60	0.19	3.56	0.61	4.63	0.16
SE	Bracknell Forest	0.00	0.00	0.00	0.00	0.00	0.00
SE	Brighton & Hove	0.00	0.00	0.00	0.00	0.00	0.00
SE	Buckinghamshire	0.94	0.31	0.00	0.00	0.24	0.01
SE	East Sussex	0.14	0.05	0.00	0.00	0.00	0.00
SE	Hampshire	2.93	0.95	0.00	0.00	0.01	0.00
SE	Kent	2.48	0.81	2.26	0.39	1.32	0.05
SE	Medway	0.00	0.00	0.00	0.00	1.19	0.04
SE	Milton Keynes	0.35	0.11	0.00	0.00	2.94	0.10
SE	Oxfordshire	0.13	0.04	0.00	0.00	0.00	0.00
SE	Portsmouth City	0.00	0.00	0.00	0.00	0.00	0.00
SE	Reading	0.00	0.00	0.00	0.00	0.11	0.00
SE	Slough	0.06	0.02	0.08	0.01	0.12	0.00
SE	Southampton City	0.09	0.03	0.00	0.00	0.00	0.00
SE	Surrey	1.42	0.46	0.01	0.00	12.69	0.44
SE	West Berkshire	0.09	0.03	3.39	0.58	7.45	0.26

SE	West Sussex	2.42	0.79	0.04	0.01	23.70	0.82
SE	Windsor & Maidenhead	0.00	0.00	0.00	0.00	0.00	0.00
SW	Wokingham	0.04	0.01	0.00	0.00	0.00	0.00
SW	Bath & North East Somerset	0.25	0.08	0.13	0.02	6.73	0.23
SW	Bournemouth, Christchurch & Poole	0.40	0.13	0.00	0.00	0.00	0.00
SW	Bristol City	0.00	0.00	0.00	0.00	1.53	0.05
SW	Cornwall	0.17	0.06	0.00	0.00	2.43	0.08
SW	Devon	0.42	0.13	0.00	0.00	1.65	0.06
SW	Dorset	1.91	0.62	0.00	0.00	0.03	0.00
SW	Gloucestershire	0.72	0.23	0.00	0.00	0.00	0.00
SW	North Somerset	0.09	0.03	0.00	0.00	5.80	0.20
SW	Plymouth	0.03	0.01	0.20	0.03	0.38	0.01
SW	Somerset	0.72	0.23	0.00	0.00	3.36	0.12
SW	South Gloucestershire	0.26	0.08	3.39	0.58	1.60	0.06
SW	Swindon	0.00	0.00	0.00	0.00	0.00	0.00
SW	Torbay	0.00	0.00	0.00	0.00	0.00	0.00
SW	Wiltshire	0.73	0.24	10.17	1.75	2.37	0.08
WAL	Bridgend	0.00	0.00	0.00	0.00	0.00	0.00
WAL	Caerphilly	0.00	0.00	0.00	0.00	2.47	0.09
WAL	Cardiff	1.07	0.35	0.00	0.00	62.15	2.15
WAL	Carmarthenshire	0.00	0.00	0.00	0.00	0.48	0.02
WAL	Ceredigion	0.00	0.00	0.00	0.00	0.00	0.00
WAL	Denbighshire	0.00	0.00	0.00	0.00	0.00	0.00
WAL	Flintshire	3.39	1.10	11.30	1.95	16.82	0.58
WAL	Gwynedd	0.00	0.00	0.00	0.00	0.00	0.00

WAL	Monmouthshire	0.00	0.00	0.32	0.06	0.00	0.00
WAL	Neath Port Talbot	0.00	0.00	0.00	0.00	6.59	0.23
WAL	Newport	0.00	0.00	0.00	0.00	7.93	0.27
WAL	Powys	0.39	0.13	0.00	0.00	0.66	0.02
WAL	Rhondda Cynon Taff	0.00	0.00	0.00	0.00	0.00	0.00
WAL	Swansea	0.00	0.00	0.00	0.00	0.00	0.00
WAL	Vale of Glamorgan	5.48	1.78	0.00	0.00	0.00	0.00
WAL	Wrexham	0.48	0.15	0.00	0.00	0.00	0.00
WM	Birmingham City	0.72	0.23	0.65	0.11	4.71	0.16
WM	Coventry	0.07	0.02	0.00	0.00	0.00	0.00
WM	Dudley	0.00	0.00	2.48	0.43	3.46	0.12
WM	Herefordshire	1.10	0.36	0.00	0.00	0.00	0.00
WM	Sandwell	0.00	0.00	0.00	0.00	0.00	0.00
WM	Solihull	0.00	0.00	0.00	0.00	0.40	0.01
WM	Staffordshire	0.40	0.13	13.63	2.35	417.67	14.46
WM	Shropshire	0.00	0.00	0.00	0.00	0.00	0.00
WM	Stoke on Trent	0.00	0.00	0.00	0.00	0.00	0.00
WM	Telford & Wrekin	0.10	0.03	0.00	0.00	0.00	0.00
WM	Walsall	0.96	0.31	0.00	0.00	0.00	0.00
WM	Warwickshire	1.75	0.57	0.00	0.00	0.00	0.00
WM	Wolverhampton	0.00	0.00	0.00	0.00	0.04	0.00
WM	Worcestershire	0.87	0.28	0.16	0.03	0.90	0.03
YH	Barnsley	3.10	1.01	0.00	0.00	15.40	0.53
YH	Calderdale	40.67	13.21	108.44	18.68	206.21	7.14
YH	Doncaster	0.11	0.03	0.00	0.00	0.85	0.03
YH	East Riding of Yorkshire	13.06	4.24	10.17	1.75	35.91	1.24

YH	Kingston upon Hull	0.00	0.00	0.00	0.00	0.57	0.02
YH	Kirklees	86.05	27.95	58.16	10.02	396.57	13.73
YH	Leeds	19.44	6.31	68.36	11.77	358.33	12.41
YH	North East Lincolnshire	0.00	0.00	0.00	0.00	14.62	0.51
YH	North Lincolnshire	28.81	9.36	92.76	15.98	30.96	1.07
YH	North Yorkshire	5.00	1.62	0.01	0.00	49.67	1.72
YH	Rotherham	7.97	2.59	1.71	0.29	5.77	0.20
YH	Sheffield	6.26	2.03	0.00	0.00	16.72	0.58
YH	Wakefield	2.30	0.75	0.00	0.00	24.64	0.85
YH	York, City of	0.09	0.03	82.89	14.28	217.14	7.52
UO	Unknown Origin	0.00	0.00	1.13	0.19	0.14	0.00
Totals		307.88	100	580.57	100	2,888.12	100

Source: Hazardous Waste Data Interrogator, 2021 to 2023 (Environment Agency)

7 Strategic Waste Movements

7.1 Based on the information set out in preceding sections of this paper, and the thresholds set out in Section 2, the strategic waste movements have been identified between Bradford and a number of other Waste Planning Authorities during 2023. These are set out in **Table 7.1** and **Table 7.2** (below).

Table 7.1: Strategic Waste Movements – Exports (2023)

Household, Industrial and Commercial Waste (> 1,000 tonnes)	Hazardous Waste (> 100 tonnes)	Inert/C+D Waste (> 1,000 tonnes)
Barnsley	Bury	Calderdale
Buckinghamshire	Cheshire West & Chester	Derbyshire
Bury	Derbyshire	Doncaster
Calderdale	Kirklees	Kirklees
Doncaster	Knowsley	Leeds
Halton	Lancashire	Lincolnshire
Hartlepool	Leeds	North Yorkshire
Kent	Liverpool	Rotherham
Kingston upon Hull	North East Lincolnshire	Sheffield
Kirklees	North Northamptonshire	Wakefield

Lancashire	Nottingham	
Leeds	Nottinghamshire	
Lincolnshire	Redcar & Cleveland	
Liverpool	Rotherham	
North Yorkshire	Salford	
Nottinghamshire	Sandwell	
Wakefield	Sheffield	
	Stockton on Tees	
	Trafford	
	Wakefield	
	York	

Table 7.2: Strategic Waste Movements – Imports (2023)

Household, Industrial and Commercial Waste (> 1,000 tonnes)	Hazardous Waste (> 100 tonnes)	Inert/C+D Waste (> 1,000 tonnes)
East Riding of Yorkshire Kirklees Leeds North East Lincolnshire Rotherham Yorkshire & Humber – WPA Not Codeable	North West – WPA Not Codeable West Midlands – WPA Not Codeable Yorkshire & Humber – WPA Not Codeable	Kirklees Leeds Wakefield Yorkshire & Humber – WPA Not Codeable

8 Duty to Co-operate/Engagement Letter

- 8.1 A letter together with an appendix detailing waste movements was sent to those WPAs that identified in **Table 7.1** and **Table 7.2** (above) seeking to confirm if the information set out in the WDI and HWDI was correct and whether the movements were likely to continue. Views were also sought on the thresholds used to determine strategic waste movement. An example letter is included as Appendix 1.

9 Responses

- 9.1 Responses were received from 18 of the WPAs contacted. **Appendix 2** provides details of the responses received in relation to the Duty to Co-operate requests sent to those Waste Planning Authorities where strategic waste movements to/from Bradford District were identified.

10 Summary of Issues Raised

- 10.1 As set out above, **Appendix 2**, sets out details of the responses received. This section provides a summary of the issues raised by the respondents in answer the questions:

- 1. Thresholds used to identify strategic movements** – most respondents considered the thresholds used to define strategic movements of waste to be appropriate. However, it was highlighted that thresholds vary between WPAs reflecting local circumstances and/or those agreed by groups of authorities through Waste Technical Advisory Bodies (WTABs). Examples of these thresholds were provided.

Reference was also made to thresholds proposed in guidance produced by the chairs of the WTABs entitled Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England. This document refers to a threshold of 5,000 tonnes for non-hazardous waste and a separate threshold of 10,000 tonnes for inert waste as well as 100 tonnes for hazardous waste. Many of those providing details of their thresholds would have appeared to have used this non-statutory guidance as part of setting them.

One area defined threshold based on the level of waste arisings within each of the component WPA areas to allow a more focussed view to be taken regarding strategic waste movements and Duty to Co-operate matters.

It was pointed out that the thresholds used by CBMDC were in many cases lower than those used elsewhere.

- 2. Identified waste movements** – most respondents agreed with the information supplied regarding the levels of the waste movements between Bradford District and their areas. Several provided minor corrections and/or factual updates to the data including site details and waste quantities.

Two respondents suggested that further work was required to include more up to date information from the 2024 version of the WDI that had been published in September 2025. One of these also suggested that the quantities of waste removed from sites should also be assessed.

One respondent highlighted that one metal recycling facility in the Huddersfield area may not be able to receive waste from Bradford District in future as the operator had been placed into administration and the site had been closed. It was further highlighted that a landfill in the Kirklees area was due to cease operation in 2028. Other sites in Kirklees had safeguarded in the Local Plan.

- 3. Strategic matters/constraints affecting waste movements from Bradford District to other WPAs** – most respondents did not consider that there were any matters or constraints that would affect future strategic waste movements between Bradford and other areas within the country. In some cases, it was highlighted that existing facilities were/will be protected in current/emerging Local Plans.

In several cases, respondents stated that facilities, particularly landfills were coming to the end of their working lives and would close during the early to medium parts of the Bradford District Local Plan period or would not have any further capacity. Furthermore, it was noted that capacity to accept waste at facilities in a nearby authority may be constrained as it will be required to receive additional waste generated by growth and development in that area.

One respondent highlighted that CBMDC should not have an expectation of being able to rely on capacity at facilities in their area in the future. It was also highlighted that a facility would not be available due to the operator having gone into administration.

- 4. Strategic matters/constraints affecting the scale of waste movements to Bradford District from other WPAs** – many respondents highlighted that no waste movements took place between their area and Bradford District. Other WPAs where movements to Bradford District did occur suggested that there were no reasons to

assume that these movements would not continue to take place in future. One respondent highlighted that during 2024, 40,000 tonnes of waste was moved from that WPA area to the Far Shay site.

5. **Other strategic waste movements** – all respondents indicated that they were not aware of any other or additional strategic waste movements between Bradford District and their areas (and vice versa).
6. **Are the identified waste movements considered to be a strategic matter and whether there is a need for further discussion and/or collaboration, and a joint Statement of Common Ground to reflect this** – a number of respondents agreed that some of the waste movements identified between Bradford and other areas met the threshold to be considered strategic, whilst others did not. Generally, there was a view that additional discussion and/or collaboration was not necessarily required, nor was there a need to prepare a joint Statement of Common Ground to reflect this.

It was highlighted that CBMDC and a neighbouring authority are signatories to the Leeds City Regional Statement of Common Ground, which requires parties to share data/information on waste matters and to maintain a shared proportional evidence base including keeping up to date the West Yorkshire Waste Model. It was noted that changes to planning system would still mean that authorities will need to continue to collaborate across boundaries on matters such as waste.

11 Next Steps

- 11.1 Strategic waste movements between Bradford District and other WPAs in the country will continue to be monitored in the coming years using the information provided by the Environment Agency's Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI) published every autumn as base. This will allow any changes in the quantities of waste being moved to be identified together with the availability of facilities for handling this waste.
- 11.2 City of Bradford Metropolitan District Council will publish its draft Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulation 2012 to allow representations to be made on its legal compliance and soundness. As part of this process, the information in this paper will be reviewed to consider data from the 2025 (based on 2024 data) and 2026 (based on 2025 data) versions of both interrogators and contact made with relevant waste planning authorities as part of ongoing co-operation. It is anticipated that the latter editions of the WDI and HWDI will be available in autumn 2026.

Appendix 1: Strategic Waste Movements – Duty to Co-operate Letter (Example)



Department of Growth

Planning, Transportation & Highways
Floor 4, Britannia House
Hall Ings
Bradford
BD1 1HX

Tel: (01274) 431184/07866 127264

Email: jain.cunningham@bradford.gov.uk

Date: 26 November 2025

Planning Policy
Barnsley Metropolitan District Council
PO Box 634
Barnsley
South Yorkshire
S70 9GG

Via e-mail to: planningpolicy@barnsley.gov.uk

Dear Sir or Madam,

BRADFORD DISTRICT LOCAL PLAN: DUTY TO COOPERATE STRATEGIC WASTE MOVEMENTS

City of Bradford Metropolitan District Council (CBMDC) is currently working on a new District-wide single Local Plan that will form the long-term land use planning strategy and planning policy framework for the future growth and development of the District over the period to 2038. This will include policies for minerals and waste.

After undertaking community and stakeholder consultation on a Preferred Options (Regulation 18) version of the emerging Local Plan in February/March 2021, CBMDC is now in the process of preparing a Pre-Submission Draft Plan and its associated evidence base.

Under the Duty to Co-operate (DtC), CBMDC has used the Environment Agency's Waste Data Interrogator (WDI) and Hazardous Waste Data Interrogator (HWDI) to identify strategic waste movements between Bradford District and other Waste Planning Authorities across the country.

The thresholds that CBMDC intend to use to define strategic waste movements between the District and individual waste planning authorities are:

- 1,000 tonnes per annum for non-hazardous waste
- 1,000 tonnes per annum for inert/construction & demolition waste
- 100 tonnes per annum for hazardous waste

Based on the information contained in the WDI and HWDI for 2023, the strategic waste movements between Bradford and your authority detailed in Appendix 1 have been identified.

For the tables relating to exports, this is the total amount of waste received into facilities within your authority which has been recorded as originating in Bradford. Similarly, the tables relating to imports show the total tonnage of waste received into Bradford facilities which originated from your authority.

Whilst the HWDI has been used to identify strategic movements for hazardous waste, this dataset does not provide detail on which facility the waste was managed. Therefore, within Appendix 1 for hazardous waste movements, information is given from both the HWDI and WDI.

Considering the data provided, it would be very much appreciated if you could please respond addressing the questions below:

1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why?

2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies.
3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future?
4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future?
5. Are there any other waste movements of a strategic nature that you are aware of?
6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration?

Please submit your response by e-mail to iain.cunningham@bradford.gov.uk by **Friday 19th December 2025**.

If you have any further queries about this matter or the emerging Bradford District Local Plan in general, please do not hesitate to contact me using details provided at the top of this letter.

Thank you in advance for your assistance.

Yours faithfully,

Iain Cunningham
Senior Planning Officer – Local Plan

Appendix 2: Duty to Co-operate Letter – Responses

WPA Region	Waste Planning Authority	Responses
YH	Barnsley Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? The thresholds quoted are much lower than those set out in the South Yorkshire Waste Needs Assessment. The thresholds considered to be strategic movements can be found here at para 155 SY Waste Needs Assessment 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. I agree with the Carlton Road site figure of 1,326.58. I can't see a reference to the waste received at Boulder Bridge Lane, however it is not a significant amount. Waste received at Tank Row Works from Bradford totals 197.34 in the latest version of the 2023 WDI. However again this is not significant. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? Not at present. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? Not at present. 5. Are there any other waste movements of a strategic nature that you are aware of? Not at present. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? Not at present.

NW	Bury Council (response by Greater Manchester Combined Authority)	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? The thresholds used by Greater Manchester Authorities are below although it is accepted that what is considered a strategic waste movement would vary between Waste Planning Authorities. • Non-hazardous waste: 5,000 tonnes per annum • Inert waste: 10,000 tonnes per annum • Hazardous waste: 500 tonnes per annum 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Table 2.1 - the total tonnage should read 4362.18. Section 3 – the heading should read ‘Strategic Waste Movements from <u>Bury</u> to Bradford District.’ 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? Pilsworth South Landfill currently only has planning permission until 2028 and would need to be restored by 2028, so would close before then unless a planning application to extend the use is made. In relation to any other facilities, these are commercial operations and there are no known planning reasons why these facilities should not remain operational during this period. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? There are no known reasons why these movements would not continue at a similar scale in the future. 5. Are there any other waste movements of a strategic nature that you are aware of? I am not aware of any other data regarding movement of waste between Bury and Bradford. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? The thresholds used by Greater Manchester Authorities are below although it is accepted that what is considered a strategic waste movement would vary between Waste Planning Authorities.
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		• Non-hazardous waste: 5,000 tonnes per annum • Inert waste: 10,000 tonnes per annum • Hazardous waste: 500 tonnes per annum
NW	Cheshire West and Chester Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? We consider the thresholds used to be appropriate, however relatively small in comparison to the thresholds used by Cheshire West and Chester. CWaC uses the thresholds agreed by the north-west authorities and are as follows: • >5,000 tonnes per annum for non-hazardous waste • >10,000 tonnes per annum for inert waste • >500 tonnes per annum for hazardous waste 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. We can confirm that we agree with the waste movements set out in the tables below, as cross referenced with the 2023 Waste Data Interrogator. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? In regard to imports to Cheshire West and Chester from Bradford District, we are not aware of any strategic matters that may affect capacity at our sites, or which would prevent waste movements continuing in the future. In our recent Issues and Options (Regulation 18) consultation paper, draft policies and potential new growth areas continue to safeguard waste sites/facilities, therefore we expect our waste sites to continue to remain operational. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? In relation to exports from Cheshire West and Chester to Bradford District, according to the 2023 Waste Data Interrogator (WDI) Bradford District receives 42.97 tonnes of hazardous waste and no movements of household, industrial & commercial waste or inert waste. This is a relatively small amount of waste and not one of strategic significance. We are not aware of any reasons why these movements would cease or change significantly. 5. Are there any other waste movements of a strategic nature that you are aware of?

		There are no other movements of a strategic nature that we are aware of. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? Cheshire West and Chester does not consider the movements of waste between Bradford District and ourselves to be of strategic importance. We do not feel a joint Statement of Common Ground is necessary.
YH	City of Doncaster Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? It is not for Doncaster to propose changes to another authority's DtC thresholds, however with regard to the strategic nature of the movement of waste material, the thresholds set for the South Yorkshire WNA are significantly higher than the ones proposed by Bradford. The strategic movement thresholds were defined relative to waste arisings for each of the South Yorkshire WPAs. It states within our WNA... <i>'In order to identify thresholds relative to South Yorkshire WPA, the quantum of waste arising from South Yorkshire was taken into consideration. Local circumstance has been given consideration in the identification of the thresholds, which typically represent a minimum of 5% of waste arisings for the relevant waste stream; a 5% significance level is widely accepted as indicating a significant difference. These thresholds allow for a more focussed view to be taken regarding strategic movements and identification of potential DtC matters'</i>, see below for thresholds: • Household, Industrial and Commercial (HIC) waste - From an individual WPA to an individual waste management facility 10,000 tonnes per annum (tpa), • Inert waste - From an individual WPA to an individual waste management facility 10,000 tpa for Barnsley, Doncaster and Rotherham, and 15,000 tpa for Sheffield, and • Hazardous waste - From an individual WPA to another WPA for a specific management method (e.g. recovery, treatment, landfill, etc.) 350 tpa for Barnsley, 500 tpa for Doncaster and Rotherham, and 1,000 tpa for Sheffield. I believe the thresholds proposed are too low and will potentially pick up for too many movements to be discussed/considered through duty to cooperate, so from our perspective we would only consider DtC requirements for material movements above the thresholds noted above. I also recommend looking at other years not just 2023 WDI data to see if there are consistent patterns of movements or if they are just a 'one-off' for that year. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. We agree with the information shown above for movement of HIC and Inert C+D waste to Hazel Lane Quarry. We do not believe the thresholds are such that DtC matters require consideration.

Table 2.1: Household, Industrial & Commercial Waste Movements - Bradford District to Doncaster (2023)

Permit Ref	Site Name & Location	Site Category	Facility Type	Waste Fate (s)	Tonnage
BL4940IU	Hazel Lane Quarry, Hazel Lane, Doncaster	Landfill	Non-Hazardous Landfill	Landfill	7,040.62
Total					7,040.62

Source: Environment Agency Waste Data Interrogator 2023 (issued 2024)

Table 2.2: Inert/C+D Waste Movements - Bradford District to Doncaster (2023)

Permit Ref	Site Name & Location	Site Category	Facility Type	Waste Fate (s)	Tonnage
103726	Hazel Lane Quarry & Landfill, Hazel Lane, Doncaster	Treatment	Physical Treatment	Recovery	3,119.78
Total					3,119.78

Source: Environment Agency Waste Data Interrogator 2023 (issued 2024)

Movement of waste from Doncaster to Bradford is negligible see below:

	C	E	F	Q	R	S	T	U	V	W	X	Y	
	Facility WPA	Permit	Site Name	Waste Code	Site Category	Facility Type	Recorded Origin	Origin WPA	Origin Region	Fate	R and D coc	Tonnes Received	SOC
42	Bradford City	60675	Yard At Simmonites	16 01 04*	MRS	Car Breaker	Doncaster	Doncaster	Yorks & Humber	Transfer (D)	D15	23.9	08 - 1
81	Bradford City	65451	City Salvage	16 01 04*	MRS	Car Breaker	Doncaster	Doncaster	Yorks & Humber	Recovery	R04	6	08 - 1
89	Bradford City	65340	Hall Lane Car Spares	16 01 04*	MRS	Car Breaker	Doncaster	Doncaster	Yorks & Humber	Recovery	R04.02.02	3.39	08 - 1
33	Bradford City	103998	Bradford 4x4 Spares Limited	16 01 04*	MRS	Vehicle depollution facility	Doncaster	Doncaster	Yorks & Humber	Recovery	R04.02.02	11.3	08 - 1
52	Bradford City	65323	Bradford Autospare & Salvage	16 01 04*	MRS	Car Breaker	Doncaster	Doncaster	Yorks & Humber	Recovery	R04.02.02	6	08 - 1
16	Bradford City	65518	Yorkshire Van Breakers Ltd	16 01 04*	MRS	Car Breaker	Doncaster	Doncaster	Yorks & Humber	Recovery	R04	3.9	08 - 1

3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future?

The planning consent associated with Hazel Lane quarry 19/00072/REVA is authorised until January 2034 see screenshot from the decision notice below:

		01. Mineral extraction and landfill operations within the area shown on drawing reference C5737/2e being subject to planning permission reference 01/0817/P/MINA is authorised until 13 January 2034, by which time all mineral extraction and landfill operations shall have ceased and the restoration of the site shall be completed and have entered into aftercare. REASON For the avoidance of doubt 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? At this current point in time we (Doncaster Council) are not aware of any changes that would affect the scale of waste movements in the future. 5. Are there any other waste movements of a strategic nature that you are aware of? No 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? We do not consider the waste movements set out in the appendix to be a strategic matter for our authority at this current point in time.
YH	East Riding of Yorkshire Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? The guidance produced by the chairs of the regional waste technical advisory bodies (Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England) references a threshold of 5,000 tonnes for non-hazardous waste and a separate threshold of 10,000 tonnes for inert waste. We appreciate this guidance is non-statutory and there may be local circumstances suggesting the application of a lower threshold is appropriate for Bradford. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Having reviewed the waste movements noted in the Waste Data Interrogator (WDI) for 2023, the data, shown in your letter dated 26.11.25, appears to be an accurate reflection of the tonnages received in East Riding and originating from Bradford. Please note

		the WDI was recently updated reflecting 2024 data. Generally speaking, the strategic movements of waste will need to be reviewed in the context of this data release. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? According to the WDI in 2024, only 60 tonnes of household/industrial/commercial waste was received in the East Riding and originating from Bradford. No Inert C&D waste was received from Bradford. Please note we are at an early stage in the preparation of waste planning policies and therefore our operator surveys, and other evidence base work, has not yet been carried out. We cannot therefore make detailed comments regarding the operational capacity of individual waste management facilities in our area to accept waste from outside of our boundary. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? According to the WDI in 2024, nearly 40,000 tonnes of waste was sent from East Riding to Bradford City. This is significantly higher than the 5,160 tonnes reported in 2023. The majority of the waste sent to Bradford City and originating from East Riding was sent to 'The Far Shay' site (Soil Restoration limited, Landfill). Should you become aware of any changes to the capacity or operational circumstances of this site or any receiving waste from East Riding (Esholt Waste Water receives nearly 10,000 tonnes) we would be happy to engage in further discussions. 5. Are there any other waste movements of a strategic nature that you are aware of? No response 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? No response
SE	East Sussex County Council	7. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? East Sussex County Council (the Council) is a signatory to the South East Waste Planning Advisory Group's (SEWPAG) Statement of Common Ground, where it is agreed that strategic waste movements are defined as below: • Non-Hazardous Waste – 5000 tonnes per annum. • Inert Waste – 10,000 tonnes per annum.

		• Hazardous Waste – 100 tonnes per annum. As such, the Council considers the thresholds used to identify the above strategic hazardous waste movements to be appropriate. As the thresholds Bradford District intend to use to define inert and non-hazardous strategic waste movements are equal or lower than that of East Sussex, these thresholds are also considered to be appropriate. 8. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. The Council agree that the waste movements identified in Table 1 above are the only waste movements recorded by the 2023 Waste Data Interrogator and 2023 Hazardous Waste Interrogator. 9. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? No strategic matters or constraints are identified which may affect similar waste movements in the future. However, it is advised that Bradford District should not hold an expectation to rely on facilities within East Sussex for the management of the waste identified in Table 1 above in the future. 10. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? The 2023 Waste Data Interrogator and 2023 Hazardous Waste Interrogator identify no movements of waste from East Sussex to Bradford District. Although the Hazardous Waste Interrogator does not identify specific sites at which waste movements are received, the Council is not aware of any anticipated closures to sites within the district of Rother that accept these waste types at this time. 11. Are there any other waste movements of a strategic nature that you are aware of? The Council is not aware of any other strategic waste movements between itself and Bradford District apart from those outlined in Table 1 above. 12. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? The Council considers that the movements set out in Table 1 are a strategic matter. However, due to the relatively small-scale nature of the movements in 2023 (363.62 Tonnes), the Council does not consider that further discussion or collaboration is required.
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NW	Halton, Knowsley & Liverpool (Waste Planning Merseyside)	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? Yes, I consider the thresholds used appropriate. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. I have cross checked the information against the Waste Data Interrogator and HWDI and have found the Knowsley and Halton figures to be correct. However, there are some discrepancies regarding the Liverpool HIC data. The table provided shows a total of 11,312.83 tonnes, when I have totalled up the 5 figures shown in the table they total to 12966.7 tonnes, which is mentioned in the text surrounding the table. However, when checking the WDI 2023 myself I found the data provided in the table below which totals to 12,957.38 tonnes. This is not a significant discrepancy. <table data-bbox="902 584 1706 1098"> <tr> <th colspan="3">WDI 2023 HIC</th></tr> <tr> <th>Site Name</th><th>Postcode</th><th>Tonnes</th></tr> <tr> <td>S Norton</td><td>L20 8RQ</td><td>523.56</td></tr> <tr> <td>S Norton</td><td>L20 1DE</td><td>7,905.95</td></tr> <tr> <td>S Norton</td><td>L20 1DQ</td><td>156.39</td></tr> <tr> <td>Bankfield House</td><td></td><td>4,245.44</td></tr> <tr> <td>Greenway</td><td></td><td>126.05</td></tr> <tr> <td>Total</td><td></td><td>12,957.38</td></tr> </table> 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? No. These facilities are safeguarded under policy WM7 of the WLP as existing waste management capacity to, in the first instance, serve the needs of the sub-region. However, we acknowledge that these movements are dictated by commercial waste contracts which are outside the scope of planning. The sites involved tend to be regionally significant or hazardous waste facilities. Therefore, from a WLP perspective, I consider that provided movements from Bradford District do not increase significantly on 2023 levels,	WDI 2023 HIC			Site Name	Postcode	Tonnes	S Norton	L20 8RQ	523.56	S Norton	L20 1DE	7,905.95	S Norton	L20 1DQ	156.39	Bankfield House		4,245.44	Greenway		126.05	Total		12,957.38
WDI 2023 HIC																										
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Bankfield House		4,245.44																								
Greenway		126.05																								
Total		12,957.38																								

		there is no planning reason why movements similar to those stated cannot continue. This should be monitored as part of your review. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? There are no strategic waste movements from Halton, Knowsley, or Liverpool to Bradford District. 5. Are there any other waste movements of a strategic nature that you are aware of? Not from the consulted councils and Sefton, St Helens and Wirral Councils have not indicated that they have been consulted by Bradford District. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? I do not consider the movements to be a strategic matter. No, I do not consider that a Statement of Common Ground is needed to cooperate on this issue.
NE	Hartlepool Borough Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? Agree that the tonnages specified are strategic in nature. It is noted that CBMDC have used 1,000 tonnes per annum for non-hazardous waste as the threshold of identifying strategic waste movements. Hartlepool Borough Council have been contacted by several other local authorities recently regarding strategic waste movement who have used a threshold of over 5,000 tonnes per annum for non-hazardous waste. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Hartlepool Borough Council are unable to comment on the accuracy of the table as this would need to be discussed with the contractors identified, the Environment Agency and the CBMDC. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? No, Hartlepool Borough Council are not aware of any planning reasons that might affect the acceptance of waste material from CBMDC. The sites identified are allocated in Hartlepool Local Plan (2018) under Policy EMP3b for general employment uses including B2.

		Waste policies for the Hartlepool area are provided in the Tees Valley Joint Minerals and Waste DPDs comprising of a Core Strategy DPD (2011) and Policies and Sites DPD (2011) Policy MWC6e of the Core Strategy provides the waste strategy for the Tees Valley and sets out within criterion that the sustainable management of waste arisings will be delivered through developing the regional and national role of the Tees Valley for the management of specialist waste streams. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? No waste movements from Hartlepool to CBMDC are identified. 5. Are there any other waste movements of a strategic nature that you are aware of? Waste facilities within Hartlepool receive strategic waste movements from several other Local Authorities. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? The total amount of waste received from CBMDC is strategic in nature, however, it is not felt that further discussions or a statement of common ground is required at this time.
YH	Kingston upon Hull City Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? Thresholds used are appropriate and commonly found in practice 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Yes, the movements identified in the tables below are largely correct. Although, the information is limited to waste 'received' at sites and does not include information about waste 'removed' from sites. Please recheck the same for accuracy. Also, the latest data could be more useful. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? Not aware. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? Not aware.

		5. Are there any other waste movements of a strategic nature that you are aware of? The data for waste 'removed' from sites show movements more than your used thresholds and shall deem some sites to be strategically important. Latest data might negate the need of further strategic collaboration for such sites. Please check and confirm such. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? Please see previous answer.
YH	Kirklees Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? No – we recently commissioned an update to our Waste Needs Assessment, and part of this work involved DTC engagement in which we used the following thresholds recommended by the National Waste Technical Advisory Body Chairs which are as follows: • Non-hazardous waste: 5,000 tonnes per annum • Inert waste: 10,000 tonnes per annum • Hazardous waste: 100 tonnes per annum By using these thresholds, we were able to take a more focussed approach towards identifying target authorities for DTC engagement 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Regarding the Back Chapel Lane Site in Huddersfield, the site was operated by Sims Group and then Unimetals however, Unimetals have gone into administration, so this site is currently closed. Regarding Bradley Park Landfill, the Environment Agency's Landfill Capacity database indicates that there is no landfill capacity at the site whilst the 2016 version of the Waste Needs Assessment that was used to inform the current iteration of the Kirklees Local Plan (available at https://www.kirklees.gov.uk/beta/planning-policy/local-plan-supporting-local-evidence-2017.aspx) states that landfilling operations will end in 2028 unless the relevant consents are renewed. Paragraph 6.5.7 of the 2016 Waste Needs Assessment also states that it is unknown whether applications to extend operations will be sought or approved therefore this site will be unable to continue receiving waste from Bradford.

		With the exception of Clayton Hall Bioenergy Plant, all of the Kirklees sites are safeguarded by Policy LP45 which protects waste sites in the District from the following: • Developments that would result in the loss of facilities unless it can be demonstrated that there is no longer a need for the facility or where capacity can be met elsewhere in the district. • Proposals that would prevent, hinder or unreasonably restrict the operation of the waste development. It is the intention to continue with a similar policy in an updated version of the Kirklees Local Plan. It should also be noted that Clayton Hall Farm was not safeguarded in the Local Plan and further information is available in paragraph 16.35 of the Kirklees Local Plan which states the following: <i>‘The Council recognise that farm holdings may include facilities associated with the processing of waste, such as anaerobic digestion, these facilities have the potential to play an important role in meeting the waste needs of the district. Facilities such as these have not been identified on the proposals map, however the role that these facilities play in continuing to process waste material will be monitored.’</i> 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? We have reviewed WDI data covering from 2019 to 2023 (plus the WDI for 2024) and in the case of Old Crown Dyeworks and Octane House, there are regular flows of waste from Kirklees to Bradford, even though the tonnages may fluctuate over time, and it is unclear as to whether these flows may continue into the future. It may be the case that the facilities in Bradford receiving waste from Kirklees offer services which are unavailable within Kirklees. It may also be the case that Kirklees has facilities but the sites in Bradford are more accessible to the areas of Kirklees from where the wastes arose (e.g. some of the wastes managed at sites in Bradford arose in areas closer to the district boundary between Kirklees and Bradford). 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? We have reviewed WDI data covering from 2019 to 2023 (plus the WDI for 2024) and in the case of Old Crown Dyeworks and Octane House, there are regular flows of waste from Kirklees to Bradford, even though the tonnages may fluctuate over time, and it is unclear as to whether these flows may continue into the future. It may be the case that the facilities in Bradford receiving waste from Kirklees offer services which are unavailable within Kirklees. It may also be the case that Kirklees has facilities but the sites in Bradford are more accessible to the areas of Kirklees from where the wastes arose (e.g. some of the wastes managed at sites in Bradford arose in areas closer to the district boundary between Kirklees and Bradford). 5. Are there any other waste movements of a strategic nature that you are aware of? No – we are unaware of any other strategic waste movements between Kirklees and Bradford.
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		6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? Yes, we agree that the waste movements are a strategic matter for Kirklees with Kirklees and Bradford both being signatories to the Leeds City Region Statement of Common Ground in which paragraph 23 states that parties agree to sharing data/information both within and beyond the Leeds City Region on waste matters and to maintaining a shared, proportional evidence base including keeping up-to-date the West Yorkshire Waste Model (for relevant partner councils), undertaking regular waste capacity gap analysis. We are also mindful of the incoming changes to plan-making and the abolition of the duty to co-operate and with the Written Ministerial Statement from 27th November 2025 (https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104) advising that LPAs should continue to collaborate across boundaries, we think that waste is one of those areas where continued discussions between LPAs will be appropriate.
EM	Northamptonshire area (response made by North Northamptonshire Council).	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? Northamptonshire County Council as was, and now North and West Northamptonshire Councils, support the use of thresholds in relation to strategic movements of waste, however we consider strategic movements to be (generally) a minimum of 10,000t (from one Waste Planning Authority, WPA, to an individual facility), or 500t for hazardous waste (from one WPA to another WPA). The reasoning for the 10,000t threshold is that movements below this level would seem to indicate one-off or ad-hoc arrangements that by their nature are not strategic or are smaller quantities that may be able to be accommodated at another facility quite easily. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. We have checked the WDI/HWDI and agree with the figures identified. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? The Councils in Northamptonshire are aiming for net self-sufficiency in waste management, which accepts that due to market forces waste will travel outside the WPA areas and likewise into the WPA areas. At present we are not aware of any reason why the current movements cannot continue. The Northamptonshire Councils have a policy that sets out the use of catchments for waste sites. These catchments range from National to Neighbourhood and depend on the type of facility proposed. This approach recognises that cross boundary movements

		are still likely to occur but assists in managing and disposing waste as close to its source as possible therefore minimising waste movements 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? Not Applicable. 5. Are there any other waste movements of a strategic nature that you are aware of? Not aware of any further movements that could be considered strategic. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? As previously set out Northamptonshire County Council as was, and now North and West Northamptonshire Councils, support the use of thresholds in relation to strategic movements of waste. Therefore, the movement set out in the WDI of wastes from Bradford District to Northamptonshire in 2023 would meet our thresholds. However, when checking the totals for 2024 the hazardous total has fallen to 278t which falls below the thresholds. This would suggest that movements are not consistent and that it will be down to the commercial arrangements with the facility and therefore we do not feel further discussions are required in relation to this site. Unless future monitoring evidence suggests significant changes in the future pattern of waste movements between our respective authorities, we are satisfied that the Bradford District have taken appropriate steps in terms of duty to cooperate and we do not wish to raise any strategic planning issues. We therefore do not feel a statement of common ground is required.
EM	Nottingham City Council and Nottinghamshire County Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? We believe the thresholds used to identify strategic waste movements are appropriate. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. We agree with the movements identified as set out in the letter sent to Nottinghamshire County Council. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future?

		The Council is not aware of any strategic matters or constraints which might affect waste movements from Bradford District to Nottinghamshire County. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? Currently no waste is imported into Bradford City from Nottinghamshire. We do not anticipate this to change. 5. Are there any other waste movements of a strategic nature that you are aware of? We are not aware of any other waste movement of strategic nature. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? We agree the movements are a strategic matter however we do not feel further discussion or a Statement of Common Ground is necessary. We would though be happy to discuss further with Bradford District if this was desired.
NE	Redcar & Cleveland Borough Council	We agree with the thresholds used to identify strategic waste movements. We have no reason to believe that the data within the Waste Interrogator is incorrect. We are unaware of any planning related reasons which would affect the continued movement of waste in the future.
YH	Rotherham Metropolitan Borough Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? Yes, we agree that the thresholds are appropriate. We are of the opinion that they align with national guidance, reflect local context, as well as ensuring a high level of environmental protection and human health. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. We agree with the movements identified in the tables, except for the following. In Table 2.1, there are missing site locations (postcode). • 61595: C.F. Booth Ltd, Clarence Metal Works, Armer Street, Rotherham • 65517: Roy Hatfield Ltd, Fullerton Road, Brinsworth, Rotherham • 101892: Cronimet (GB) Ltd, Greasbrough Road, Rotherham In Table 2.2, tonnage of Phoenix Motors Ltd should be 21.72, see screenshot 1.

Facility WPA	Rotherham	⌵
Origin WPA	Bradford City	⌵
Basic Waste Cat	Hazardous	⌵
Row Labels	Sum of Tonnes Received	
AMA - Rotherham - EPR/PP3398ZM	31	
K B P Vauxhall	9.015	
Phoenix Motors Limited	21.72	
Rotherham Waste Oils - EPR/KP3732KJ	507.27	
Safety Kleen Dinnington EPR/FP3794VN	67.82812	
The New Depot EPR/AP3095EM	94.757	
Grand Total	731.59012	

And the permit ref for AMA (Storage & Distribution) Ltd should be LP3731JD, see screenshot 2.

Facility WPA	Rotherham	⌵
Origin WPA	Bradford City	⌵
Basic Waste Cat	Hazardous	⌵
Row Labels	Sum of Tonnes Received	
AMA - Rotherham - EPR/PP3398ZM	31	
LP3731JD	31	
K B P Vauxhall	9.015	
401011	9.015	
Phoenix Motors Limited	21.72	
404582	21.72	
Rotherham Waste Oils - EPR/KP3732KJ	507.27	
KP3732KJ	507.27	
Safety Kleen Dinnington EPR/FP3794VN	67.82812	
VP3331AZ	67.82812	
The New Depot EPR/AP3095EM	94.757	
FP3030KQ	94.757	
Grand Total	731.59012	

In Table 2.3, tonnage of EWC Code 12 should be 15.69, see screenshot 3.

Arising WPA	Bradford City	.x
Deposit WPA	Rotherham	.x
Waste Fate	Transfer (R)	.x
Row Labels Sum of Tonnage		
06 13 02*	1	
07 01 10*	18.5	
07 04 10*	22.5	
08 01 11*	9.96	
08 01 13*	0.2	
08 04 09*	0.71	
11 01 13*	6.46	
12 01 07*	0.62	
12 01 09*	13.98	
12 01 14*	1.09	15.69
13 01 10*	2	
13 02 05*	31.56	
13 03 07*	1.65	
13 05 03*	2	
13 05 07*	357.45	
13 07 03*	0.41	
14 06 03*	0.28	
15 01 10*	6.96	
15 02 02*	22.23	
16 01 07*	3.12	
16 01 14*	0.62	
16 01 21*	1.9	
16 05 04*	3.7	
16 07 08*	209.1	
20 01 21*	0.68	
20 01 35*	1.45	
Grand Total	720.13	

3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future?

There are no known strategic or planning constraints that would prevent the continuation of waste being exported from Bradford District to Rotherham in the future/up to 2038. No facility closures are currently known or expected.

4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future?

Waste being imported into Bradford District from Rotherham are expected to continue. However, there is currently no available information regarding the future scale or period of these movements. At this time, we are not aware of any new or additional future movements to Bradford District.

5. Are there any other waste movements of a strategic nature that you are aware of?

There is no additional strategic waste movements identified beyond those already recorded between Rotherham and Bradford District.

		6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? Rotherham's thresholds are in the waste needs assessment, para 155: - Household, Industrial and Commercial (HIC) waste - From an individual WPA to an individual waste management facility 10,000 tonnes per annum (tpa), - Inert waste - From an individual WPA to an individual waste management facility 10,000 tpa for Barnsley, Doncaster and Rotherham, and 15,000 tpa for Sheffield, and - Hazardous waste - From an individual WPA to another WPA for a specific management method (e.g. recovery, treatment, landfill, etc.) 350 tpa for Barnsley, 500 tpa for Doncaster and Rotherham, and 1,000 tpa for Sheffield. Based on Bradford District's thresholds and Rotherham's higher thresholds, only two movements are considered strategic: - HIC waste from Rotherham to Bradford District (Esholt Composting Facility) at 11,816.92 tpa, which exceeds the 10,000 tpa threshold. - Hazardous waste from Bradford District to Rotherham, which exceeds the 500 tpa threshold for recovery (WDI) and transfer (R) (HWDI) methods. However, we do not consider that further discussion, collaboration, or a Statement of Common Ground is necessary. These are the only two movements above the thresholds, and there are no known constraints to their continued operation.
NW	Salford City Council (response provided by the Greater Manchester Combined Authority)	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? The thresholds used by Greater Manchester Authorities are below although it is accepted that what is considered a strategic waste movement would vary between Waste Planning Authorities. - Non-hazardous waste: 5,000 tonnes per annum - Inert waste: 10,000 tonnes per annum - Hazardous waste: 500 tonnes per annum. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Table 2.2. – first Waste Fate category should read 'Incineration with energy recovery'.

		Final section is missing 3.2. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? There are no known reasons why these movements would not continue at a similar scale in the future. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? There are no known reasons why these movements would not continue at a similar scale in the future. 5. Are there any other waste movements of a strategic nature that you are aware of? I am not aware of any other data regarding movement of waste between Salford and Bradford. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? The thresholds used by Greater Manchester Authorities are below although it is accepted that what is considered a strategic waste movement would vary between Waste Planning Authorities. • Non-hazardous waste: 5,000 tonnes per annum • Inert waste: 10,000 tonnes per annum • Hazardous waste: 500 tonnes per annum
WM	Staffordshire County Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? The thresholds are appropriate. Note: West Midlands Resource Technical Advisory Body have agreed that strategic waste movements are in excess of the following thresholds: • Non-Hazardous (Household, Industrial and Commercial) Waste: 5,000 tonnes per annum; • Inert (CDE) Waste: 10,000 tonnes per annum; and • Hazardous Waste: 100 tonnes per annum.

		2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. Staffordshire County Council can confirm that the information outlined in the table is correct (data taken from the Waste Data Interrogator (2023) and Hazardous Waste Data Interrogator (2023)). 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? No site information has been provided. However, we are not aware of any matters or constraints that would affect the waste being exported to Staffordshire from the City of Bradford Metropolitan District (CBMDC). 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? We are not aware of any matters that may affect the small scale of these future movements. All strategic movements to CBMDC from Staffordshire are considered below the level that is considered to be a strategic movement (see above). 5. Are there any other waste movements of a strategic nature that you are aware of? There are no other waste movements of a strategic nature that the council is aware of. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? We do not consider the movements set out in the appendix to be a strategic matter for our authority. There is no need for further discussion.
NW	Trafford Council (response provided by the Greater Manchester Combined Authority)	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? The thresholds used by Greater Manchester Authorities are below although it is accepted that what is considered a strategic waste movement would vary between Waste Planning Authorities. • Non-hazardous waste: 5,000 tonnes per annum • Inert waste: 10,000 tonnes per annum • Hazardous waste: 500 tonnes per annum.

		2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. I agree with the movements identified. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? There are no known reasons why these movements would not continue at a similar scale in the future. 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? There are no known reasons why these movements would not continue at a similar scale in the future. 5. Are there any other waste movements of a strategic nature that you are aware of? I am not aware of any other data regarding movement of waste between Trafford and Bradford. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration? The thresholds used by Greater Manchester Authorities are below although it is accepted that what is considered a strategic waste movement would vary between Waste Planning Authorities. • Non-hazardous waste: 5,000 tonnes per annum • Inert waste: 10,000 tonnes per annum • Hazardous waste: 500 tonnes per annum
YH	Wakefield Council	1. Do you consider the thresholds used to identify strategic movements to be appropriate? If not, what would you consider to be appropriate thresholds and why? Yes, Wakefield used these thresholds for the Local Plan 2036 to identify strategic waste movements, but we are aware that some authorities are now applying higher thresholds based on draft guidance issued by the National Waste Technical Advisory Body Duty to Cooperate on Waste – Practice Guide for Waste Planning Authorities in England, May 2021, which proposes: • Non-hazardous waste – 5,000 tonnes per annum • Inert waste - 10,000 tonnes per annum • Hazardous – 100 tonnes per annum min

		But we appreciate this is a matter to be determined based on local circumstances. 2. Do you agree with the movements identified in the tables below? If not, please detail any discrepancies. A 2024 version of the Waste Data Interrogator was published in September 2025, so it may be relevant to update the waste movements based on this latest data, depending on the base date for your evidence reports. 3. In relation to waste being exported from Bradford District to your authority, are you aware of any strategic matters or constraints that might affect these waste movements in the future? Some of the waste being exported to Wakefield is being managed at commercial facilities, which will be market driven. However: • South Kirkby Plant is allocated in the Wakefield District Local Plan for strategic municipal waste management (WS01) and commercial and industrial waste management (WS02). It is anticipated that an increase in capacity at this site will be required to accommodate for an increase in predicted waste arisings in Wakefield district, due to the growth in the Local Plan. Therefore, there may be less capacity at this site in the future to accept waste from outside the district. • Welbeck landfill is another strategic municipal waste management facility identified for residual waste management to landfill (WS04) in the Local Plan and commercial and industrial waste management (WS03). There has been a recent appeal decision to extend the timescales for operation at the site as follows (APP/X4725/C/24/3337726): <i>This permission shall be limited to the period ending 31 December 2028 by which time operations shall have ceased and the site will have been restored in accordance with the approved restoration scheme. All non-hazardous waste imported into the containment landfill cells, excluding capping materials and soil restoration materials, shall cease by no later than 31 December 2026.</i> So, the cessation of operations at this facility will need to be taken into consideration for future waste management planning in Bradford 4. In relation to waste being imported into Bradford District from your authority, are you aware of any matters that may affect the scale of these movements in the future? These movements appear to be fairly small and will generally be market driven so we have no other specific comments to make in relation to these. 5. Are there any other waste movements of a strategic nature that you are aware of? No. 6. Do you consider the movements set out in the appendix to be a strategic matter for your authority? If you consider the movements to be a strategic matter, do you consider that further discussion and/or collaboration is needed, and a joint Statement of Common Ground created to reflect this discussion/collaboration?
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		The waste movements are relatively low, especially when viewed against the alternative higher thresholds in the NWTAB guidance. Wakefield is planning to be as self-sufficient as possible in managing waste arisings in the district, as set out in the Local Plan adopted in 2024, and would expect other waste planning authorities to be taking the same approach. A number of waste movements between the 2 authorities are to private waste management facilities, which will be market driven based on commercial viability. There are some waste movements from Bradford to the strategic municipal waste management facilities in Wakefield at South Kirkby and Welbeck. However, Welbeck will no longer be accepting waste after December 2026, so provided alternative provision is made outside Wakefield district to accommodate the associated waste movement, this would not be a strategic issue. The amount of waste being managed at South Kirkby from Bradford is very low, therefore this is not considered to be of strategic significance on its own. Nevertheless, we would encourage Bradford to plan to be as self-sufficient as possible in managing waste arisings, and related to this are the comments made at point 3 about the importance of South Kirkby in meeting the future predicted needs for waste management in Wakefield district. If you consider a joint statement of common ground would be useful, based on our comments, then we would be happy to discuss this further.
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