Leeds City Council

Natural Resources and Waste

Leeds Local Development Framework

Development Plan Document

Policy Position Report

January 2010

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(Bengali):-

যদি আপনি ইংরেজীতে কথা বলতে না পারেন এবং এই দলিলটি বুঝতে পারার জন্য সাহায্যের দরকার হয়, তাহলে দয়া করে 0113 247 8092 এই নম্বরে ফোন করে আপনার ভাষাটির নাম বলুন। আমরা তখন আপনাকে লাইনে থাকতে বলে কোন দোভাষীর (ইন্টারপ্রিটার) সাথে যোগাযোগ করব।

(Chinese):-

凡不懂英語又須協助解釋這份資料者，請致電 0113 247 8092 並說明本身所需語言的名稱。當我們聯絡傳譯員時，請勿掛斷電話。

(Hindi):-

यदि आप इंग्लिश नहीं बोलते हैं और इस दस्तावेज़ को समझने में आपको मदद की ज़रूरत है, तो कृपया 0113 247 8092 पर फ़ोन करें और अपनी भाषा का नाम बताएँ। तब हम आपको होल्ड पर रखेंगे (आपको फ़ोन पर कुछ देर के लिए इंतज़ार करना होगा) और उस दौरान हम किसी इंटरप्रिटर (दुभाषिए) से संपर्क करेंगे।

(Punjabi):-

ਅਗਰ ਤੁਸੀਂ ਅੰਗਰੇਜ਼ੀ ਨਹੀਂ ਬੋਲਦੇ ਅਤੇ ਇਹ ਲੇਖ ਪੱਤਰ ਸਮਝਣ ਲਈ ਤੁਹਾਨੂੰ ਸਹਾਇਤਾ ਦੀ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰ ਕੇ 0113 247 8092 'ਤੇ ਟੈਲੀਫ਼ੂਨ ਕਰੋ ਅਤੇ ਅਪਣੀ ਭਾਸ਼ਾ ਦਾ ਨਾਮ ਦੱਸੋ. ਅਸੀਂ ਤੁਹਾਨੂੰ ਟੈਲੀਫ਼ੂਨ 'ਤੇ ਹੀ ਰਹਿਣ ਲਈ ਕਹਾਂ ਗੇ, ਜਦ ਤਕ ਅਸੀਂ ਦੁਭਾਸ਼ੀਏ (Interpreter) ਨਾਲ ਸੰਪਰਕ ਬਣਾਵਾਂ ਗੇ.

(Urdu):-

اگر آپ انگریزی نہیں بولتے ہیں اور آپ کو یہ دستاویز سمجھنے کیلئے مدد کی ضرورت ہے تو براہِ مہربانی اس نمبر 0113 247 8092 پر فون کریں اور ہمیں اپنی زبان کا نام بتائیں۔ اس کے بعد ہم آپ کو لائن پر ہی انتظار کرنے کیلئے کہیں گے اور خود ترجمان (انٹرپریٹر) سے رابطہ کریں گے۔

This publication can also be made available in Braille or audio cassette. Please call 0113 247 8092.

HAVE YOUR SAY

Leeds City Council is consulting on the Policy Position for the Natural Resources and Waste Development Plan Document between 18 January and 1 March 2010. The Policy Position Report and supporting documents are available for inspection at the following locations,

- Development Enquiry Centre, Development Department, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Monday – Friday 8:30am – 5pm, Wednesday 9:30am – 5pm)
- All libraries across the Leeds district
- All One Stop Centres across the Leeds district

These documents are also published on the Council's website. To download the proposals go to www.leeds.gov.uk/ldf and follow the link for the Natural Resources and Waste Development Plan Document within the Local Development Framework. Paper copies of the document can be requested from the address below.

Please return your comments to nrwdpd@jacobs.com or the following address by 5pm on 1st March 2010.

Natural Resources and Waste Development Plan Document
Jacobs UK
1 City Walk
Leeds
LS11 9DX

Telephone: 0113 2478075
Email: nrwdpd@jacobs.com

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To contact Planning Aid

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32 The Calls, Leeds, LS2 7EW
Telephone: 0113 204 2460 Fax: 0113 389 9871
Email: ykco@planningaid.rtpi.org.uk
Website: www.planningaid.rtpi.org.uk

For general planning advice contact the Planning Advice Helpline:

Telephone: 0870 850 9808
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GLOSSARY OF TERMS

The terminology used in this Policy Position (unless a definition is given within the report text) is summarised below:

Term	Definition
Aftercare	The treatment of land for a period (usually five years) following restoration to bring the land to the required standard so that it is fit for its agreed after-use.
After-use	The use (nominally for agriculture, forestry or amenity) that land is put to once restored following mineral working.
Aggregates	Materials such as sand and gravel and crushed rock used in the construction industry for purposes such as concrete and roadstone.
Agricultural Waste	Waste from premises used for agriculture within the meaning of the Agriculture Act 1947.
Anaerobic Digestion	Anaerobic Digestion (AD) is a biological process that happens naturally when bacteria breaks down organic matter in environments with little or no oxygen. It is effectively a controlled and enclosed version of the anaerobic breakdown of organic waste in landfill which releases methane.
Ancient Woodland	An area of woodland which has had a continuous history of tree cover since at least 1600.
Apportionment	The County's share of Regional aggregate provision.
Aquifer	A water bearing geological formation.
Area of Search	A broad area within which some mineral extraction may be acceptable subject to detailed consideration.
Biodiversity Action Plan (BAP)	A strategy for conserving, restoring, enhancing and creating habitats of importance.
Commercial and Industrial Waste (C&I) Waste	Broadly, *commercial waste* is classified as waste arising from wholesalers, catering establishments, shops and offices (in both the public and private sectors) while *industrial waste* is waste arising from factories and industrial plants. Neither of these categories includes consideration of wastes from the construction, demolition and excavation sectors.
Composting (Aerobic Digestion)	A biological process in which biodegradable wastes such as garden and kitchen wastes are decomposed in the presence of air by the action of micro-organisms (for example bacteria and fungi).
Construction and Demolition and Excavation Waste	Construction and demolition waste (C&D waste) includes hard C&D and excavation waste materials as separately defined in this glossary. These waste materials arise as a direct result of: ▪ the total or partial demolition of buildings and/or civil engineering infrastructure; or ▪ the construction of buildings and/or civil engineering infrastructure.

Term	Definition
Development Plan	Statutory documents produced under the Planning Acts that set out the planning policies and proposals for the operational development and use of land. Decisions on planning applications must conform to the development plan, unless material considerations indicate otherwise.
Development Plan Document (DPD)	A term introduced by the Planning and Compulsory Purchase Act 2004. DPDs are part of the Local Development Framework for an area. The Council requires to produce the following DPDs to guide future land use and other spatial planning matters: A Core Strategy, site specific allocations of land or thematic policies, a proposals map, and area action plans (where needed). Together with the Regional Spatial Strategy, DPDs form part of the statutory development plan.
District Heating Networks	A heat distribution system to utilise heat produced from a central heat source. Heat could be generated from CHP technology, or power generation plants, but could be heat from local industry that would otherwise be wasted.
Ecological Footprint	Measures the demand humans have upon the planet's ecosystems.
Environment Agency	Regulatory Authority formed in 1996, combining the functions of the former National Rivers Authority, Waste Regulation Authorities and Her Majesty's Inspectorate of Pollution.
EU Landfill Directive 99/31/EC	Sets the targets for the UK to meet regarding landfill.
Excavation waste	Includes both clean and contaminated waste soil, stone and rocks arising from land levelling, civil works and/or general foundations.
Fluvial	The term fluvial refers to rivers, river waters or any plants and animals that inhabit them.
Flood Design Event	The rainfall depth or flow rate to be used in design and assessment. A 1% design event is likely to be exceeded once in 100 years, on average, but has a 1% chance of being exceeded in any one year.
Existing Formal Drainage system	In the context of this document, this is the existing local watercourses (including ditches and swales) and the underground artificial drainage systems (including sewers, culverts, and drains).
Groundwater	Water within soil, sediments or rocks below the ground surface. Water contained within underground strata is referred to as an aquifer
Hazardous Waste	Specifically defined in European law as those wastes featuring on a list - the European Waste Catalogue (EWC), drawn up by the European Commission because they possess one or more of the hazardous properties set out in the Hazardous Waste Directive
Impermeable	An impermeable surface is one which does not allow the passage of water through it and which water therefore will run off
Inert waste	Waste that does not undergo any significant physical, chemical or

Term	Definition
	biological, transformations.
Landbank	A stock of mineral reserves with planning permission for their winning and working.
Local Development Framework (LDF)	A term introduced by the Planning and Compulsory Purchase Act 2004, the LDF comprises a suite of documents, which together guide future development for a local area. In addition to DPDs, the LDF must contain a Local Development Scheme (which sets out the timetable for completing each document), a Statement of Community Involvement (which sets out how the Council will involve local people and stakeholders in decision-making on planning matters), and an Annual Monitoring Report. Additionally, Supplementary Planning Documents can be prepared to provide additional detail on areas of planning policy not contained in DPDs.
Landfill and Landraise	Two main ways of disposing of waste to land. Landfill is when a large hole, usually an old quarry is filled up with waste whereas land raise operations place waste on top of existing land levels thus raising the height of the land.
Micro-generation	The generation of power from renewable sources by individuals.
Micro-hydrogeneration	Use of falling water to generate power on an individual/small-scale basis.
Mineral Safeguarding Area	A mineral area where planning permission is controlled to prevent uses which are incompatible with or unnecessarily sterilise a mineral resource.
Mineral Planning Authority (MPA)	An organisation with statutory planning powers relating to minerals development.
Municipal Waste (MSW)	Municipal waste includes household waste and any other wastes collected by waste collection authorities (or their agents) such as municipal parks and gardens waste, beach cleansing waste, commercial or industrial waste and waste resulting from the clearance of fly-tipped materials.
Opencast Working	A form of surface mining to win minerals.
Organic Waste Treatment	Includes composting, and other technologies which allow for the treatment of organic waste and the recovery of usable resources.
Permeable	A permeable surface is any surface which will allow the passage of water through it; for example gravel is permeable, but tarmac is not. Different surfaces have differing levels of permeability and when saturated, water will run off permeable surfaces.
Permitted Development Rights	Rights to carry out certain limited forms of development without the need to make an application for planning permission, as granted under the terms of the Town and Country Planning (General Permitted Development) Order 1995.
Planning Conditions	Conditions attached to a planning permission for the purpose of regulating and controlling the development.

Term	Definition
Primary Aggregates	Naturally occurring sand, gravel and crushed rock used for construction purposes.
Reclamation of mineral workings	The combined processes of Restoration and Aftercare following completion of mineral working.
Recycled Aggregates	Aggregates produced from recycled construction waste such as crushed concrete, planings from road surfacing etc.
Residual Waste	Waste materials that are leftover after all waste prevention, recycling and composting initiatives have been applied. Mechanical, biological and thermal technologies can treat this waste, generating energy (in the form of power and heat), recyclable materials and/or compost. Otherwise this waste would be sent to landfill.
Residual Waste Treatment Facilities	Facilities that can treat residual waste as a resource to recover recyclable materials, heat and power. There are range of technologies available including mechanical, biological and thermal treatments, and these may be used in combination in a single facility. Some technologies involve burning waste at high temperatures to reduce its volume by turning it into ash and generate heat, which may be used directly or to generate electricity (these are often referred to as Energy from Waste Plants or Energy Recovery Facilities). Thermal treatment also includes gasification and pyrolysis, which are considered new technologies in the UK but are regularly used to treat waste in Europe.
Restoration	Operations designed to return an area to an acceptable environmental state, whether for the resumption of the former land use or for a new use following mineral working. Involves the reinstatement of land by contouring, the spreading of soils or soil making materials etc.
Saved Policies	As part of the local planning context, the City Council's Unitary Development Plan (UDP, which was adopted in August 2001), was followed by a selective UDP review (adopted in July 2006). Under the Local Development Framework transitional arrangements, policies in the UDP are 'saved' for an initial period of 3 years or until they are replaced by LDF policies and documents. See the link below for further details. http://www.leeds.gov.uk/page.aspx?pageidentifier=6e8fe6ea-41bb-4840-b9df-efe98b3a4e65
Scheduled Ancient Monuments	Nationally important monuments and archaeological areas that are protected under the Ancient Monuments and Archaeological Areas Act 1979.
Secondary Aggregates	By-product wastes e.g. power station ash and colliery spoil that can be used for low-grade aggregate purposes, either solely or mixed when mixed with primary aggregates.
Sites of Special Scientific Interest (SSSIs)	Sites that are notified and protected under the Wildlife and Countryside Act 1981 on account of their flora, fauna, geological or

Term	Definition
	physiographical features.
Special Area of Conservation (SAC)	An SSSI considered being of international importance designated under the EC Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora.
Special Landscape Area	Non-statutory designation protecting areas from development or other man-made influences.
Statement of Community Involvement (SCI)	A document that sets out the planning authority's intended consultation strategy for different elements of the planning process. This is a requirement brought in by the Planning and Compulsory Purchase Act 2004.
Sterilisation	When a change of use or the development of land prevents possible mineral exploitation in the foreseeable future.
Strategic Environmental Assessment (SEA)	An evaluation process for assessing the environmental impacts of plans and programmes. SEA is a statutory requirement introduced through an EU Directive.
Supplementary Planning Document (SPD)	A document that expands on policies set out in a DPD or provides additional detail.
Sustainability Appraisal (SA)	An evaluation process for assessing the environmental, social, economic and other sustainability effects of plans and programmes. SA is a statutory requirement introduced by the 2004 Planning Act.
Waste Transfer Stations (WTS)	Facilities for receiving and "bulking up" waste before its onward journey for treatment, recycling or disposal elsewhere. They are used to transfer waste from smaller road vehicles to vehicles with greater capacity or trains /barges, thus reducing the related traffic.
Yorkshire and Humber Assembly	A regional body comprising of representatives from local authorities and other economic, environmental and social organisations. Responsible for preparing the Regional Spatial Strategy. The Yorkshire and Humber Assembly is not Local Government for Yorkshire and Humber. Check the report and see whether it should be YHA or local government depends whether it is referred to now or in the past if past stay as it is but explain.

LIST OF ABBREVIATIONS

AAP	Area Action Plans
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
BAT	Best Available Techniques
BAP	Biodiversity Action Plan
BGS	British Geological Survey
BMW	Biodegradable Municipal Waste
BREW	Business Resource Efficiency and Waste Programme
CD&E waste	Construction, Demolition and Excavation Waste
CHP	Combined Heat and Power
C&I Waste	Commercial and Industrial Waste
CNG	Compressed Natural Gas
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
DPH	Dwellings Per Hectare
EF	Ecological Footprint
ELV	End of Life Vehicles
GDP	Gross Domestic Product
HGV	Heavy Goods Vehicles
HWSS	Household Waste Sorting Site
IAO	Issues and Alternative Options Paper
IWS	Integrated Waste Strategy
LATS	Landfill Allowance Trading Scheme
LCC	Leeds City Council
LDD's	Local Development Documents
LDF	Local Development Framework
LNR	Local Nature Reserve
LPG	Liquefied Petroleum Gas

MPA	Mineral Planning Authority
MPG	Minerals Policy Guidance
MPS	Minerals Planning Statements
MRF	Materials Recovery Facilities
MSA	Mineral Safeguarding Areas
MSW	Municipal Waste
NRFA	Natural Resource Flow Analysis
NRWDPD	Natural Resources and Waste Development Plan Document
PPC	Pollution Prevention Control
PPG	Planning Policy Guidance
PPS	Planning Policy Statements
REAS	Resource and Energy Analysis Study
RPB	Regional Planning Bodies
RSS	Regional Spatial Strategy (The Yorkshire and Humber Plan, Regional Spatial Strategy to 2026)
RTAB	Regional Technical Advisory Body
SAMs	Scheduled Ancient Monuments
SSSIs	Sites of Special Scientific Interest
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SPD	Supplementary Planning Document
SA	Sustainability Appraisal
SWTW	Sewage Waste Treatment Works
UDP	Unitary Development Plan
WDA	Waste Disposal Authority
WEEE	Waste Electrical and Electronic Equipment Directive
WRAP	Waste and Resources Action Plan

1 INTRODUCTION

WHAT IS THIS DOCUMENT?

1.1 The Natural Resource and Waste Development Plan Document (NRWDPD) is one of the first policy documents within Leeds' new Local Development Framework - part of the new style local development plan. This document sets out the Council's Planning Policy Position for policies on Natural Resources and Waste for the period up to 2026. It aims to:

- Ensure responsible use of natural resources such as minerals, water and energy;
- Predict future pressures on resources, such as climate change and increased housing growth, and plan for these by reducing flood risk, improving air quality and increasing renewable energy provision;
- Ensure that sufficient sites are provided to enable us to manage our waste;
- Increase waste recycling and processing so that less waste goes to landfill;
- Encourage more use of those resources that don't run out, such as solar and wind energy.

WHAT DOES IT DO?

1.2 The NRWDPD Policy Position report sets out which policy options the Council would like to include in the final plan so that the Council can carry out its responsibilities to promote sustainable development and land use planning functions. The geographical proposals for minerals and waste are shown on Maps A1 and A2 in this Report with detailed maps for each site provided in a separate Mapbook.

1.3 The report is part of a process of on-going consultation. It is developed from an evaluation of the 'Issues and Options' around natural resources and waste. The Council carried out a comprehensive stakeholder and community consultation during late Spring 2008 on the Issues and Options that it thought were important to be tackled in the NRWDPD. The results of this consultation are contained in the accompanying document 'Consultation Report - Issues and Options'.

HOW HAS IT BEEN PRODUCED?

1.4 The Policy Position has been produced from:

Available evidence including public comments:

- the available technical evidence relating to each topic;
- the results of a Sustainability Appraisal Report, published alongside the Issues and Options Report which tested the impacts of the various options;
- the results of the consultation exercises.

The legislative framework:

- relevant European directives, including those relating to waste;
- relevant national planning policy statements (PPSs) and guidance (PPGs);
- strategic documents such as the Regional Spatial Strategy (RSS): the Yorkshire and Humber Plan, which provides the overarching strategy for planning in the region up to 2026.

Local documents:

- other local documents such as the Unitary Development Plan (UDP) Saved Policies;
- the Community Strategy;
- Site Selection Studies that support the identification of the Residual Waste Facility site ;
- studies such as the Leeds 2050 Summary (July 2007); and
- ongoing work associated with the emerging Leeds Local Development Framework (LDF). This includes the Core Strategy, which will set out the overarching strategic policies for planning and development in Leeds and will provide the local context for this Natural Resources and Waste Development Plan Document.

1.5 The UDP was reviewed recently (2006) and many of its policies have been "saved" i.e. approved by the Government to continue as part of the Development Plan until they are superseded by policies in adopted DPDs. Some of the saved policies are directly relevant to the NRWDPD and will continue to be saved. However, some of the Saved policies in the UDP will be replaced with policies proposed in the NRWDPD and where this is the case it is indicated in the text, for example UDP Policy GM4 will be replaced by the Mineral Safeguarding Areas.

1.6 Sustainability appraisal has been progressed in parallel with this report to set out the social, environmental and economic effects of the proposed policy direction and an interim report produced. A final Sustainability Appraisal Report will be published with the submission NRWDPD.

WHAT HAPPENS NEXT?

1.7 The NRWDPD was approved by Development Plan Panel in October 2009 for consultation for six weeks from mid January 2010. Following the period of consultation, the Council will consider all the comments received. The Council will also carry out further technical work on the Policy Positions to test how they can be delivered and monitored, their cost effectiveness, and how well they meet the Council's wider priorities, including those in the Community Strategy (A Vision for Leeds).

1.8 When this work has been done the Council will produce a further version of this document that includes all the detailed policies for submission to Government. This will again be made available for public consultation.

THE VISION

1.9 The Council has a spatial vision for its Local Development Framework stated in the Core Strategy to paint a picture of where the Council wants to get to in the long term:

"For Leeds to be a distinctive, competitive, inclusive and successful city, for the benefit of its communities, now and in the future."

1.10 To make this particular to the aims and topics of this Development Plan, this has been expanded:

" This excellence is based upon:

- ***an efficient use of natural resources;***
- ***a low carbon economy;***
- ***a zero- waste, high recycling society;***
- ***a high level of environmental protection; and***
- ***working in partnership with individuals and organisations."***

1.11 This vision is based on the ambitions of the Council and its partners which are in the Vision for Leeds, and on work that is being done on the Core Strategy (the overarching policy document of the Local Development Framework).

1.12 Studies to date (Leeds 2050 study) have shown that it will be a challenge to square growth and economic success with the aspirations and goals for sustainability. As well as driving improvement in the ecological footprint of the Leeds City Region, policy must allow economic growth, but maintain sustainability aims.

If you think this vision needs to be changed, please say how and why in your comments.

OBJECTIVES FOR POLICY

1.13 In order to ensure that the NRWDPD can be delivered through direct and progressive actions by the Council that are consistent with the vision a number of clear objectives have been identified. As a starting point it has been necessary to identify existing priorities and saved policies from the UDP, core strategy, and associated objectives from existing research and documents; for example, The Community Strategy has already identified an objective to *"get local people and*

businesses involved in their own environment" and "*provide a better-quality environment for our children"* by the way we *"manage our environmental resources more efficiently"*.

1.14 The consultation on the NRWDPD Issues and Options has allowed the following key objectives to be distilled for each topic, which can be developed further (including targets) for Leeds where appropriate, as a result of consultation:

Diagram 1 Key Objectives for the NRWDPD

LAND USE
- **Efficient use of previously developed land, especially contaminated land.**

MINERALS AND AGGREGATES
- **Ensure that sufficient supply for local, regional and national demand is provided, but look to use secondary / re-cycled materials first.**

WATER RESOURCES
- **Ensure the protection of the quality of watercourses**
- **Support better management of the water cycle and application of efficient uses of water**
- **Ensure flood risk is reduced, taking into account the effects of climate change**

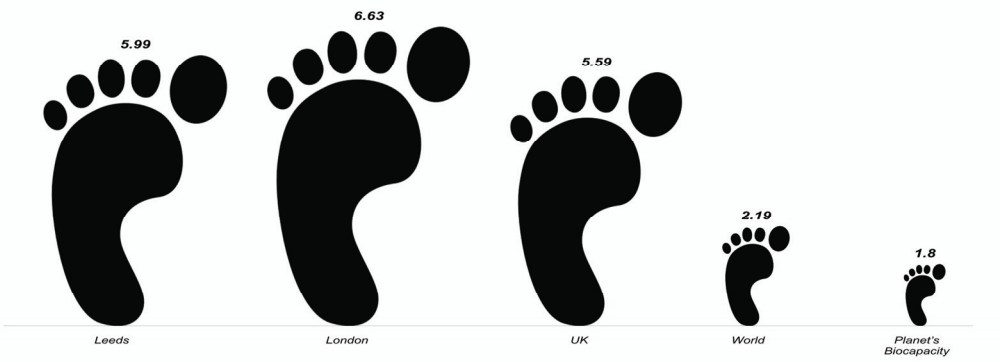
AIR QUALITY
- **Control of air polluters and where they are located.**

SUSTAINABLE ENERGY USE
- **Identify opportunities for renewable energy generation and heat distribution.**

WASTE:
- **Reduce the level of waste produced**
- **Maximise the reuse of waste**
- **Recycle and compost waste where possible**
- **Recover products from waste**
- **These objectives will be achieved through the provision of sufficient management facilities in appropriate and accessible locations in order to minimise the amount of waste going to landfill.**

1.15 The major issue of climate change is a thread which is recognised in The Vision. It also ties together all the policy topics contained in this report. Local authorities have a crucial role in tackling climate change and there is a need for up-to-date planning policies in order to deal with the issues of natural resource and waste management. These policies will help the Council to contribute to meeting the national policies for sustainable development and for reducing greenhouse gas emissions such as carbon dioxide. Leeds' ecological footprint is in line with national trends but as illustrated below is still vastly unsustainable.

Diagram 2 – Total Ecological Footprint Component, global hectares (gha) per Capita



1.16 Another thread that runs through the policy topics is how the Council can promote change by using its leadership role in the wider community and acting as an exemplar to others. The Council has selected National Indicator 185 ($C0_2$ emissions from local authority operations) as one of the key performance indicators in the Local Area Agreement negotiated with the Government Office for Yorkshire and the Humber. A target reduction in emissions of 2.1% by 2009 / 2010 and a further 1.3% by 2010 / 2011 has been agreed. Therefore, the Council intends to use its social leadership role and considerable economic influence to promote change beneficial to the environment. There are later references to the Council's wish to see policies for environmental improvement through water efficiency measures, air quality improvements, and renewable energy generation. The Council hopes that these measures will act as an exemplar to other organisations, especially those who are major partners.

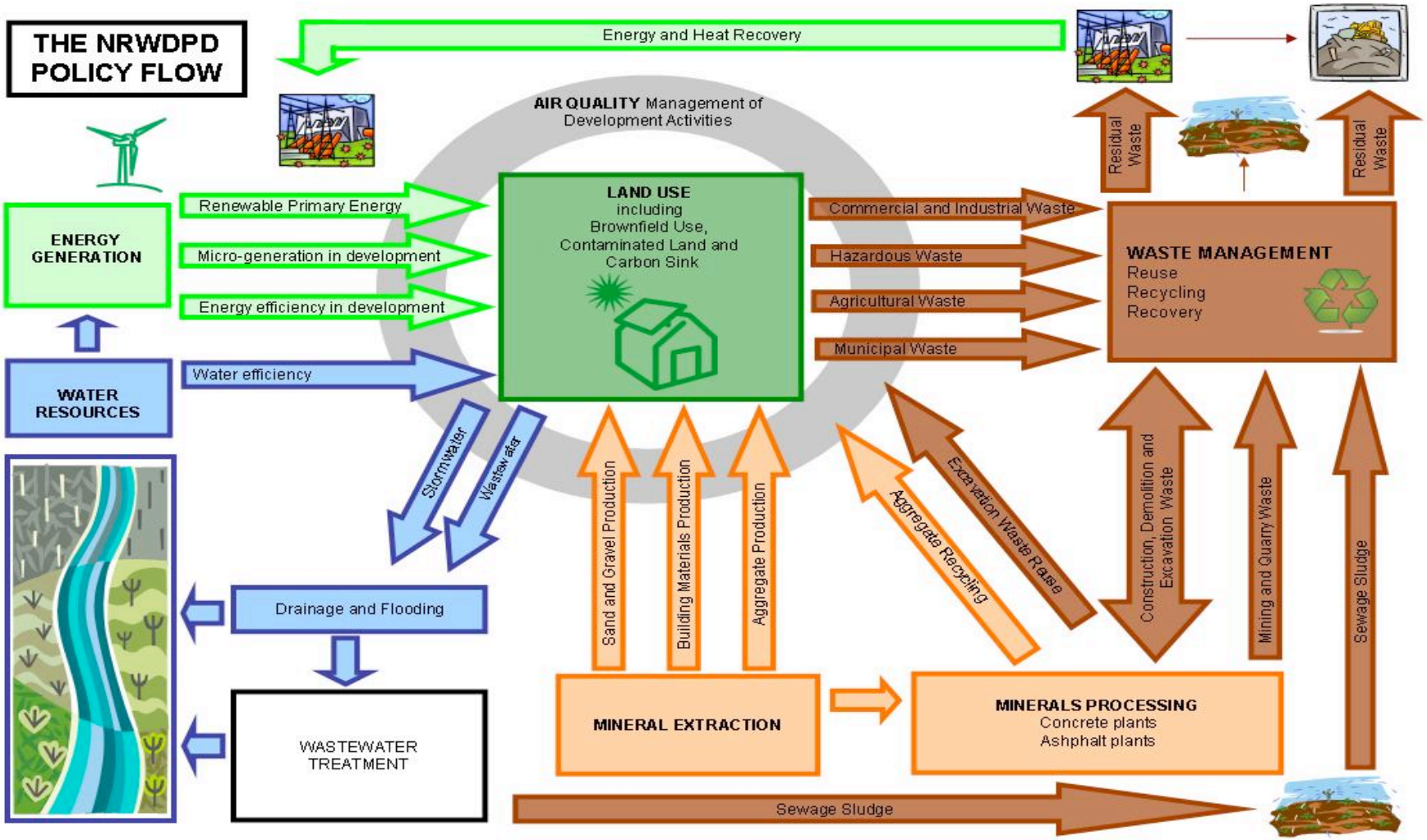
1.17 The next sections deal with the main topic areas that will comprise the NRWDPD. Their order is not significant. What is important, is the total impact of the eventual policies that are agreed. The relationship and the policy content of the topics can be represented by the Policy flow diagram (overleaf).

1.18 Each topic chapter will reference key data used as evidence for the policies, will include key relevant facts from the Natural Resource Flow Analysis (NRFA), summarise the relevant objectives from the Sustainability Appraisal, and summarise the main public responses received to the Issues and Options report. This is followed with a short explanation as to how its policy position will help deliver the above draft strategy. At the end of each chapter is a short summary of which saved policies from the UDP are relevant to the development of the policy position.

1.19 The Council has "saved" some UDP policies which means these policies will be carried forward in continued use. The council is investigating options for these "saved policies", which could include:

- continuing with "saved policies" in their present form, which would be entirely separate from this plan;
- incorporating the "saved policies" within this NRWDPD, either in their original form or updated, as appropriate;
- deleting some "saved policies" where they are no longer relevant as a result of new information or evidence.

Diagram 3 – The NRWDPD Policy Flow



1.20 There are some strategic UDP saved policies which are relevant to several of the policy positions and are consistent with the aims of this DPD. These will be retained and are set out below.

Relevant Strategic UDP Saved Policies

UDP Policy No	Summary of Content	Comment
GP5	Development proposals should prevent pollution including drainage, contamination and environmental intrusion and promote energy conservation	*Relevant to all chapters*
GP11	Development must meet sustainable design principles	*Relevant to all chapters*
SA1	Protecting good environment and renewing/restoring areas of poor environment	*Relevant to all chapters*
N33	Leeds Green Belt	*Relevant for new natural resource and waste developments*
N35	Development not permitted if it seriously conflicts with interest of protecting best and most versatile agricultural land.	*Relevant for new natural resource and waste developments*
N37	Development not permitted if it seriously harms character and appearance of Special Landscape Areas.	*Relevant for new natural resource and waste developments*
N37A	New development in the countryside	*Relevant for new natural resource and waste developments*
N50	Development will not be permitted if it harms, directly or indirectly, an SSSI, LNR, SEGI or LNA (nature conservation designations).	*Relevant for new natural resource and waste developments*

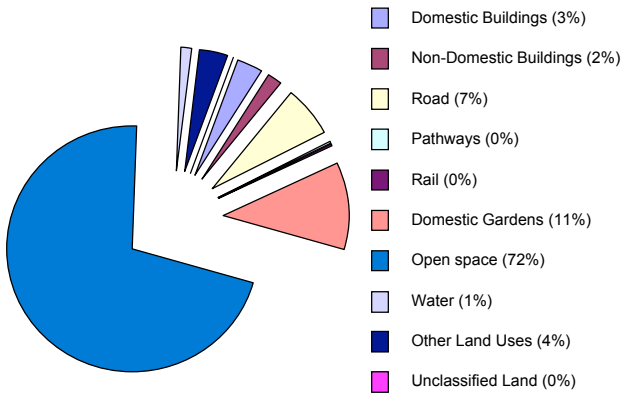
2 LAND USE

within Leeds (NRFA 2008)

Diagram 4 – Land Use

NATURAL RESOURCE FLOW ANALYSIS (2008) KEY FACTS

- major land-use in Leeds is open space, including greenspace
- Leeds exceeded the national / regional brownfield reuse targets (2008)



SUSTAINABILITY APPRAISAL OBJECTIVES

- To manage drainage capacity & flood risk
- To increase trees / woodlands
- To have more energy-efficient transport
- To reuse contaminated land
- To minimise adverse impacts from the transport network
- To use brownfield land for development
- To protect greenbelt and greenfield land

PATTERNS OF PUBLIC RESPONSE

- more use of brownfield land
- protect green spaces and local quality of life
- management of flooding
- protect local biodiversity
- sustainable choices in location of waste management facilities

PLAN OBJECTIVES FOR LAND USE

2.1 Land is a finite resource and national policy requires that land is used in the most efficient manner. For example, the use of greenfield land is discouraged and the reuse of contaminated and previously-developed (brownfield) land is encouraged. Higher densities of development are also required. This approach reduces land-take for development and fosters undeveloped land as a natural resource. The UDP saved policies restrain development from taking place within the greenbelt, in areas of important landscapes, in areas of nature conservation and biodiversity, and on agricultural land of the best quality. These policies will remain active.

2.2 The wide spatial and strategic issues associated with this approach are set out in the emerging Core Strategy. This chapter deals with additional land-use policies to minimise the land-take for development including prioritising the use of previously developed land and also deals with some of the ways of reducing the impacts of climate change and pollution caused by developing contaminated land.

2.3 National and regional policies promote sites for development which can be accessed by alternative modes of transport to the private car or lorries. This is to reduce traffic congestion and air pollution by making more use of public transport and other transport modes. The Government also supports the

use of green fuels and the use of bio-diesel and electricity for powering vehicles is growing, albeit slowly. These principles are accepted and are objectives for the plan.

LAND DEVELOPMENT

2.4 National and regional policy sets overall targets for how much development is to be located on brownfield sites and for the density of development. Leeds has exceeded these targets in recent years.

2.5 However, there are still large areas of brownfield land within Leeds which should be developed ahead of other greenfield sites and the Core Strategy will set targets for the use of brownfield land, and for achieving higher densities of development.

2.6 The co-location of natural resource and waste activities on the same sites can be beneficial in operational terms (e.g. mineral aggregate recycling) and it can also be positive in reducing landtake. If one site accommodates two or more uses, then there is usually a saving in the amount of development land that is being used. This issue was one aspect of Issues 39 - 41 (in the Issues and Options report) and there was public support for the general principle of co-locating natural resource and waste facilities.

2.7 There is an overlap between this land policy and waste and mineral policies that are designed to support co-location of facilities if appropriate. The Council is therefore currently considering where it will be most appropriate to place these policies in the emerging Development Plan Document to achieve the most effective results. Therefore, whilst there does, at this stage, appear to be some repetition of policy position in relation to co-location the Council's position is for a policy which:

Preferred Policy Position – Land 1: Reducing Landtake

Supports the co-location of natural resource and compatible waste activities on sites, preferably on brownfield sites, subject to criteria aimed at preventing adverse environmental and social impacts.

CONTAMINATED LAND

2.8 The Issues and Options report acknowledged that there are financial and other barriers to the development of contaminated land and suggested it may be appropriate to offer financial or other incentives to support developments which are financially marginal. The majority of respondents to Issue 31 agreed that contaminated sites are a wasted resource and supported the clean up of such sites in a manner that does not cause harm to the environment. However, there was less support for incentives to development such as fewer planning obligations, or prioritising the processing of planning applications on these sites.

2.9 The imposition of obligations is an important function of the planning process as it acts to ensure that a development has a positive impact on the surrounding area through developer contributions to other services and uses. Major planning applications submitted in relation to brownfield sites may also require an environmental impact assessment to be undertaken. The time taken to deal with such

applications cannot therefore be readily shortened as there are legal time periods for consultation. No policy changes are proposed in relation to this issue.

2.10 There are national and regional targets regarding development and brownfield land. The RSS sets a target for 65% of development brought forward to be on previously developed land. The Vision for Leeds has an aspiration to make sure that development on brownfield land exceeds 80%. Not all brownfield land is contaminated and indeed, some contaminated land is undeveloped, greenfield land, but be supporting development on contaminated land, the aim of developing on brownfield land is more likely to be deliverable.

Preferred Policy Position – Land 2: Contaminated Land

Supports the redevelopment of sites where there is proven contamination, requiring a financial assessment in order to determine the overall viability and to negotiate a suitable level of planning obligations.

TREE PLANTING

2.11 The use of land for woodland is an effective means of absorbing some of the carbon dioxide that is emitted into the atmosphere. Additional tree and shrub cover enhances the quality of landscape and townscape and is important for urban cooling. For these reasons, tree planting is a key part of the Council's Climate Change Strategy. The Core Strategy includes a target for tree planting in the city centre as one of the ways that the Council intends to fill the gaps in its green infrastructure. Despite this not being a specific issue in the Issues and Options report, given its importance, the Council suggests a policy which:

Preferred Policy Position – Land 3: Urban Tree planting

Protects existing woodland and tree cover where appropriate and supports additional tree and shrub planting, especially on existing greenspace, on agricultural set-aside land, on restored mineral workings, alongside transport corridors, and as part of major regeneration schemes. The policy will include *a target for urban tree planting* and a provision for all planning applications to resist healthy tree / vegetation loss and to include new planting proposals, wherever possible.

TRANSPORT MODES

2.12 National and regional planning guidance seeks to ensure sustainable development through the better integration of land-use and transport policies. Issue 31 of the Issues and Options report, in the context of minerals and waste, looked at whether road transport should be relied on as the main means of transporting materials or whether facilities such as rail sidings and wharves, which could support alternative means of transport, should be encouraged. Most respondents were in favour of supporting alternative transport modes, although some thought it inevitable that road transport would continue as the main transport mode for the foreseeable future.

2.13 The Council wishes to produce a realistic policy, but one which also signals a need to shift transport modes in the longer term. To support this shift, railway sidings and wharves have been safeguarded for such uses and are shown on Maps B2. Therefore, the preferred approach is for a policy which:

Preferred Policy Position – Land 4: NRWDPD Transport Modes

Supports in principle sites for the development of natural resource and waste activities that are capable of being accessed by means other than road; safeguards existing rail sidings and wharves, where possible; and supports new non-road infrastructure facilities.

SUPPORTING FIGURES AND PLANS

2.14 This section of the NRWDPD is supported by Maps B2 showing railway sidings and wharves proposed for safeguarding.

SAVED POLICIES

2.15 The saved policies that are particularly relevant to this chapter are set out below.

Relevant Land Use UDP Saved Policies

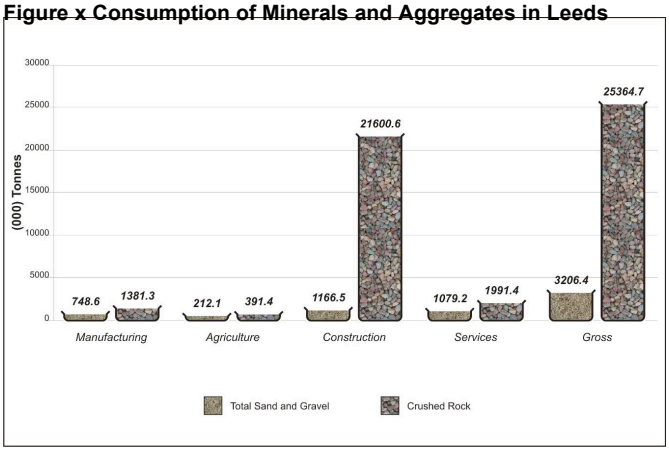
UDP Policy No	Summary of Content	Comment
N31	Priority areas for reclamation of derelict land.	*More relevant to Area Action Plans but generality relevant to Land2 policy*
N52	Proposals for reclamation of derelict/despoiled land and use of temporarily vacant sites should seek to enhance existing/provide new areas for wildlife.	*Relevant to both Land 2 and Land 3 proposals*

We would like your comments on any of the above policy positions. Please use the policy reference in your response.

3 MINERALS

Diagram 5 – Mineral Use within Leeds (NRFA 2008)

Figure x Consumption of Minerals and Aggregates in Leeds



PATTERNS OF PUBLIC RESPONSE

- More recycling of aggregates
- Protect existing pits and proven resources
- Reduce impacts of mineral extraction, including transport
- Better restoration / after-use of mineral activities
- Fewer new mineral sites

SUSTAINABILITY APPRAISAL OBJECTIVES

- To safeguard resources / provide steady supply
- To contribute to regional aggregate needs
- To maximise use of secondary / recycled materials

NATURAL RESOURCE FLOW ANALYSIS KEY FACTS

- Reserves of aggregates, building stone, clay, and coal
- Leeds not self-sufficient and imports aggregates
- High urban demand linked to expanding economy

PLAN OBJECTIVES FOR MINERALS

3.1 Minerals are a vital and finite natural resource which can only be worked where they are found and in Leeds, their production is limited to a small number of working sites. Their limited nature means that there is a need to safeguard mineral reserves and husband existing mineral workings prudently (proposals for this are shown on Maps A1 and A2). Where possible, recycled materials should be used rather than exploit natural mineral resources. To contribute to the draft strategy the emphasis is on using mineral reserves carefully although there is a requirement to meet certain regional targets for aggregates (sand, gravel and crushed rock) production.

3.2 National planning policy in Mineral Planning Statement 1 (MPS1):*Planning and Minerals* sets out requirements that are designed to ensure that the Regional Spatial Strategy (RSS) and Local Development Plan Documents:

- make sufficient provision for future needs which is not based purely on historic trends;
- safeguard resources through the establishment of Mineral Safeguarding Areas;
- provide clear policy direction in relation to ancillary or secondary mineral development, restoration and aftercare.

3.3 The Natural Resource Flow Analysis (NRFA) shows that within the Leeds area with the exception of brick clay, mineral production levels do not currently meet local consumption needs. It is clear that Leeds will have to rely on mineral imports for the immediate future. The NRFA also says that this balance of net imports is not necessarily due to excessive importation, but more probably due to the constraints on production within Leeds' geographical boundaries.

3.4 The Sustainability Appraisal suggests that subject to sensitive implementation, mineral extraction need not result in strongly negative environmental impacts and could result in some positive outcomes. Extension of existing mineral workings can for example offer the opportunity to improve the standard of restoration required by previous consents, afford opportunities for enhanced biodiversity, and make a contribution to safety of the local highway network through the introduction of routing agreements as well as maintaining economic prosperity.

3.5 An issue of concern is the transportation of minerals, where road transport is usually the only viable option. There can be adverse impacts of HGV movements on local communities, and there are carbon and other emissions that are associated with these movements.

3.6 In order to minimize the impact of mineral extraction the Council wishes to focus provision on existing quarries and therefore intends to safeguard existing mineral sites for continued use in mineral activities:

Preferred Policy Position – Minerals 1 : Safeguarded Mineral Sites

Safeguards the existing minerals sites shown on Maps B1, B2 and B3 for continued mineral purposes.

Applications for the change of use of a safeguarded minerals site must demonstrate that there is no longer a need for the site for mineral purposes either in the Leeds district or adjoining local authority areas.

3.7 The following section examines provision of different types of minerals in the Leeds District and gives guidance for future provision of aggregates, building stone, coal and brick clay. Where appropriate, the Council has identified the locations of resources which the Council would wish to protect as 'Mineral Safeguarding Areas'. These therefore represent the locations where the Council expects the future need for mineral production to be met. When this Plan is adopted the proposed Mineral Safeguarding Areas will replace Saved Policy GM4 in the UDP.

PROVISION OF AGGREGATES (SAND, GRAVEL, CRUSHED ROCK)

3.8 Issue 8 of the Issues and Options report was about the level of future production of aggregates in Leeds. Should production be on the basis of previously agreed levels, or at higher levels which would help reduce the current levels of extraction within the region's National Parks? Although there was little public support for increasing production levels, there was a wish to protect National Parks. The issue of production is more complex than location alone and the quality of the aggregate resources needs to be considered; this quality is often relatively poor in the sources within Leeds.

3.9 The RSS sets required production targets for West Yorkshire and the Council will wish to work with its adjacent partners before agreeing any change to existing levels of production in Leeds. Sub-regional apportionment levels are under review. This has led to uncertainties about the most appropriate level of aggregate provision for the sub-region, and therefore for Leeds; and this combined with the impact of the current economic downturn make it difficult to specify targets for aggregate provision beyond the early years of the plan period.

3.10 The Council wishes to protect known aggregate resource in order to be able to contribute to sub-regional demands. In order to achieve this, Mineral Safeguarding Areas are proposed that cover sand and gravel resources at the following two sites (shown on Maps B4 in the Mapbook):

- Sand and gravel: Green Lane, Methley
- Sand and gravel: Midgley Farm, Otley

The West Yorkshire Land Bank for crushed rock has sufficient capacity to satisfy demand in the Plan period. The Council expects crushed rock production to continue at Howley Park Quarry, where there are significant reserves likely to outlast the Plan period. Therefore a Mineral Safeguarding Area for crushed rock is not necessary.

Preferred Policy Position – Minerals 2 : Mineral Safeguarding Areas – Sand and Gravel

Mineral Safeguarding Areas for sand and gravel are identified at Green Lane, Methley and Midgley Farm, Otley as shown on Maps B4.

3.11 Consultation on the Issues and Alternative Options asked how, where and when sand, gravel and crushed rock should be produced (Issues 9 – 12). The options put forward were:

- the release of new sites, or limiting future extraction to existing sites and their extensions;
- using broad Areas of Search to identify those areas where minerals development will be deemed to be appropriate (subject to other policies and constraints) and should there be preferred areas within the Areas of Search, or should we continue to use criteria-based policies;
- limiting existing development where there are environmental impacts; and
- the possible production of crushed rock as a developable resource for the minerals industry.

3.12 Most people were opposed to increasing extraction rates, or identifying new sites. They also favoured a strict criteria approach to allow the Council to respond to individual cases rather than becoming committed to specific sites. However, some statutory consultees and mineral operators commented

that there is a requirement within national minerals planning policy and the Regional Spatial Strategy to identify areas in which mineral proposals should be brought forward, and those where they would not be preferred.

3.13 The planning allocation for the large site at Midgley Farm in the Wharfe Valley has yet to be taken up and will therefore allow continued sand and gravel production in the plan period. There is a specific concern over the impact any increase in aggregate production could have on the relatively natural landscapes of the Wharfe Valley which contains potential aggregate deposits.

3.14 The Council would therefore wish to have a policy which:

Preferred Policy Position – Minerals 3: Sand and Gravel Production – Environmental impact

Affords protection to the Wharfe Valley and in particular to the area east of Pool which lies within a Special Landscape area. This carries forward the principles of "saved" UDP policy N46A.

BUILDING STONE

3.15 Building stone is important to help support a growing city, but extraction has the potential to be environmentally damaging.

3.16 The use of stone for new building work is mainly limited to the more rural parts of the Leeds area and the use of stone as a new building material is often limited by cost. A gritty sandstone is used in the northern fringes of Leeds, Magnesian limestone along the eastern villages and a fine- textured hard sandstone in the south of the district. Building stone is also vital for the repair and maintenance of existing stone buildings. There is statutory recognition of the importance of this material and the need to protect it from sterilisation through the setting of Mineral Safeguarding Areas around existing resources.

3.17 There does not appear to be much public support for extensions to existing sites, or for the identification of new sites should reserves become exhausted. However, the Council needs to act responsibly to meet economic demands and therefore it proposes a policy which:

Preferred Policy Position – Minerals 4: Mineral Safeguarding Areas - Building Stone

Identifies and protects the building stone resource in those areas where it may be needed during the Plan period. These Areas will be protected from those uses which could sterilise building stone resources. Emphasis has been given to the identification of Mineral Safeguarding Areas which are extensions to existing quarries and to those Areas which could supply building stone that may be appropriate for areas of growth identified in the Core Strategy. Mineral safeguarding Areas for building stone production are identified at the following locations (as shown on Maps B4 in the Map Book):
Limestone: Highmoor Quarry extension, Bramham
Limestone: Hook Moor, Micklefield
Sandstone: Kings Road Quarry extension, Bramhope
Sandstone: Moor Top, Guiseley
Sandstone: Britannia Quarry extension, Morley

COAL

3.18 National planning guidance makes a clear presumption against open-cast coal mining. The further exploitation of fossil fuels is counter to the NRWDPD's main principles. However, the Coal Authority points out that fossil fuel technology is now improving and coal cannot be ruled out in the immediate future as an energy source. Carbon reduction through reduced emissions and the development of improved technology (such as carbon capture) suggests that coal should not necessarily be excluded as an energy source in the near future, or until such time as renewable energy sources are more fully developed.

3.19 Most respondents to the consultation did not wish to see any encouragement for further coal mining, although there may be limited occasions where coal might be extracted from development sites before the development starts. Additionally, the shallow coalfield in Leeds is very fragmented and this makes it untenable for the Council to identify Mineral Safeguarding Areas for coal. The Council, therefore, wishes to pursue a policy which:

Preferred Policy Position – Minerals 5: Coal

Acknowledges that there are existing coal resources, but does not identify Minerals Safeguarding Areas in relation to coal. Therefore, any planning applications will be decided on merit, subject to strict environmental criteria.

BRICK CLAY

3.20 Brick clay extraction was not raised as an issue during the initial consultation stage in terms of its importance to Leeds. Leeds has good clay resources in two pits and is largely self-sufficient in bricks. In view of the existing permissions, a specific Mineral Safeguarding Area for brick clay is not needed. Therefore, an appropriate policy for brick clay extraction is one which:

Preferred Policy Position – Minerals 6: Brick Clay

Supports clay extraction for brick-making at broadly current levels for the duration of the plan period by identifying and protecting the existing clay reserves at Howley Park and Swillington. The policy should look to meet any increased demand through higher extraction rates from existing clay pits.

MINERALS PROCESSING

3.21 Mineral-related activities such as concrete and asphalting facilities, and aggregate recycling were considered in terms of their site location and role in encouraging recycling. There was general public support for these activities, albeit with some environmental concerns. There is, for example, a perception that quarries are the appropriate places for these types of activity, but this is not necessarily the case. The activities may sit within a quarry where the raw materials are produced on-site, but where this is not the case such facilities could add to the overall environmental impact of the quarry.

3.22 Where such processing uses are located in general industrial areas, the general concern is that if such facilities are lost to other uses, including industrial uses, then it may be very difficult to replace them in other locations because of issues over their environmental impact. Accordingly, the Council's preferred approach is for a policy which:

Preferred Policy Position – Minerals 7: Minerals Recycling and Reuse Sites

Identifies existing sites for concreting and asphalting facilities, and safeguards them from alternative development.

INCREASING RECYCLED AGGREGATES

3.23 Recycling building materials to produce recycled aggregate and so help to husband a limited primary resource, meets one of the NRWDPD's key objectives. Recycling of Construction, Demolition and Excavation Waste (CD&E waste) is already well established in Leeds, although information on it is sparse. It is however clear that it will be necessary to make provision for dedicated sites where specific aggregate types can be produced and stored prior to distribution. Former minerals sites are an option for this and Issue 16 of the option report explored the views on areas that would be preferable for sites and how these can be best established and protected.

3.24 Public responses were generally in favour of the general principle to increase recycling facilities, but again there was concern about the best site locations and impacts on the environment. Industry responses said that site identification may be difficult given the size requirements for recycling facilities. There is a relationship between mineral policies to safeguard existing and potential sites for recycling aggregates and waste policies (see section 7).

3.25 Railway sidings and wharves that have the potential for bringing stone and/or aggregates into urban areas have also been safeguarded and are shown on Maps B2 in the Map Book which accompanies this Report. Safeguarding these facilities could support a transport mode shift (see policy Land 4), reducing the transportation of material by road and so reducing greenhouse gas emissions and congestion.

SUSTAINABLE MINERAL SITE MANAGEMENT

3.26 Currently, policies within Leeds are in favour of backfilling former mineral sites to surrounding land levels and returning them to agricultural use. This does not accord with national planning guidance, which emphasises the need to move away from landfilling waste. Issue 17 of the Issues and Options Report looked at different forms of restoration, such as reshaping voids to lower levels to accommodate aquatic diversity, leisure uses, or other uses which could, in certain areas, help to mitigate potential flood risk. There was support for investigating these different end uses for former mineral sites.

3.27 Issue 18 explored whether there should be a policy to reflect a preference in type of after-use and Issue 19 addressed the after-care and maintenance of restored sites. A majority of respondents thought that biodiversity and woodland planting should be the priority for the after-use of mineral extraction sites, although many respondents said that all the different types of after-use were acceptable. There was significant support for flexible long-term management periods for sites restored to nature conservation, although there was also support for a minimum of 10-year management periods for sites restored to nature conservation and woodland.

3.28 The Council's preference is for one policy to cover site restoration, after-use and on-going site management and to link this to the strategy of moving away from landfill to other ways of treating waste materials. Therefore, the policy will:

Preferred Policy Position – Mineral 9a: Restoration of Mineral Sites

Develop a strategic approach to the restoration of former mineral workings which moves away from a reliance on the landfill of waste. There should be a general presumption in favour of restoration to reflect local initiatives and site-specific conditions and characteristics. Examples could include the creation of additional local nature reserves to encourage biodiversity or woodland planting and planting for energy / biomass fuels.

Preferred Policy Position – Mineral 9b: Restored Site Management

In relation to site management, policies should be flexible to allow for longer periods of aftercare and maintenance for uses which may take longer to develop e.g. nature conservation and woodland schemes.

SUPPORTING FIGURES AND PLANS

3.29 This section of the NRWDPD is supported by the following plans:

- Figure 2, in the Appendix, showing current Mineral sites.
- Maps B1, B2 and B3: Safeguarded Minerals Sites, in the Mapbook, indicating those sites proposed to safeguard for future use and where there is potential to increase capacity or expand the site. These are also identified on Maps A1 and A2 in this Report
- Maps B4: Minerals Safeguarding Areas, in the Mapbook, also identified on Maps A1 and A2.

SAVED POLICIES

3.30 The table below sets out the saved UDP policies that are particularly relevant to this chapter.

Relevant Minerals UDP Saved Policies

UDP Policy No	Summary of Content	Comment
N45	General criteria to be considered for all mineral applications	*Relevant to all above policy options*
N46	Commitment to meeting regional apportionment of aggregates	*Relevant to Minerals 1*
N46A	Resist extraction in Wharfe Valley Special Landscape Protection Area	*Relevant to Minerals 1 and 3*
N46B	Support for sand and gravel at Midgley Farm, Otley subject to conditions	*Relevant to Minerals 1*
N48B	Cumulative impact of minerals and waste developments	*Relevant to Minerals 4 and 5*
EM9	Coal extraction and the environment	*Relevant to Minerals 5*
GM4	Safeguarded mineral resources. This Policy would be replaced by the proposed Mineral Safeguarding Areas in this DPD when it is adopted.	*Relevant to Minerals 5 and 6*

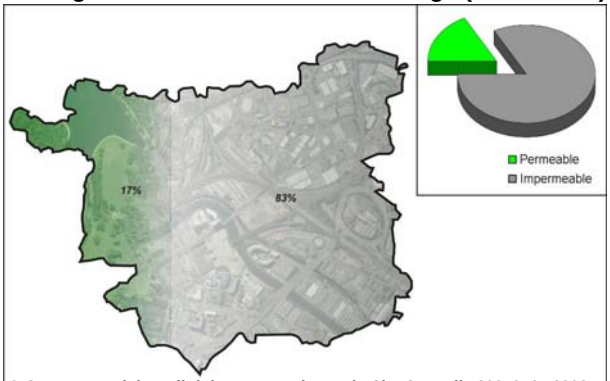
We would like your comments on any of the above policy positions. Please use the policy reference in your response.

4 WATER RESOURCES

NATURAL RESOURCE FLOW ANALYSIS KEY FACTS

- Leeds supplied by rivers, reservoirs and boreholes
- Households consume 75% of all demand
- Consumption per head 36% higher than national average
- Flooding due to under-capacity in drainage

Diagram 6 – Leeds Surface Coverage (NRFA 2008)



SUSTAINABILITY APPRAISAL OBJECTIVES

- To have better water efficiency
- To have no adverse impact from new developments on water quality
- To have proper screening to prevent water pollution

PATTERNS OF PUBLIC RESPONSE

- More efficient use of water
- Protect water quality
- Prevention of flooding

PLAN OBJECTIVES FOR WATER RESOURCES

4.1 The Rivers Aire and Wharfe and their tributaries are a dominant feature of the Leeds area. This means that there is potential disruption to life for a large proportion of the population due to flood risk. The south-eastern boundary of the District is adjacent to the River Calder and Leeds also experiences flooding from this River. The Environment Agency estimates that there are 1,500 homes and 500 businesses at 'significant' risk of river flooding within the District. Leeds City Centre is the economic and commercial heart of not only the District, but the wider region and parts of it have a 5% risk of being flooded from the River Aire. The Core Strategy sets the strategic framework for planning for flood risk, but it is an important issue, particularly in adapting to climate change and has been significantly expanded upon in this DPD.

4.2 Leeds has produced a Strategic Flood Risk Assessment (SFRA). The district is covered by four Flood zones; zone 1 is areas of low flood probability; zone 2 is areas of medium flood probability; zone 3a is areas of high flood probability; and zone 3b is the functional floodplain. This pattern of flood risk zoning is an important input to frame policies and is shown on Figure 3 in the Appendix.

4.3 In recent years Leeds has also experienced problems created by surface water flooding. Smaller watercourses and drains are far more susceptible than the larger river systems to flash flooding as a result of localised intense rainfall. With changing climate patterns it is expected that storms of this nature will become increasingly common, potentially increasing the risk posed to properties situated in close proximity to local streams.

4.4 Although water is not a scarce resource in the Leeds area, the uncertainties caused by climate change mean that it needs to be used much more carefully in the future. The Council recognises the need to reduce demand for treated clean water and more efficient usage will reduce wastewater and also help

prevent reductions in water quality with attendant pollution risks and risks for public health. There are also targets for improving water quality set by Government which need to be met.

MAKING AND PROTECTING SPACE FOR FLOODING

4.5 The functional flood plain is primarily associated with the Rivers Aire and Wharfe and their tributaries, is defined in the Leeds SFRA and is shown on Figure 3 in the Appendix. It is land where water flows, or is stored in times of flood from an event with at least a 5% probability of occurring (1 in 20 years or more frequently). It may be reserved by Leeds City Council to preserve this flood storage function and this means that development is not permitted unless it is water compatible or else essential infrastructure, which satisfies the Exception Test (allowing water compatible uses such as flood control infrastructure, amenity open space and marinas / docks and wharves, or essential infrastructure.

Preferred Policy Position – Water 1: Functional Flood Plain

Development, including changes of use, will not be permitted in the areas shown as functional floodplain in the Leeds SFRA unless it is water compatible or essential infrastructure.

4.6 Zone 3a is classed as having a high probability of flood risk. In Leeds it has been sub-divided into zone 3ai and 3aii as shown on the Leeds SFRA. Land which is situated in flood zone 3aii has the same probability of flooding as land which is in the zone 3b functional floodplain (i.e. a 5% chance of flooding in any one year). The difference is that the zone 3b land is largely open and undeveloped and therefore can provide storage space for flood water in times of flood, however the land in zone 3aii is largely developed and therefore the whole of the site cannot be reserved for storage space of flood water. The fact is that flood water is likely to go there.

4.7 Leeds thinks that it is important to make space for flood water. Although land, which is in zone 3a, can be redeveloped over the plan period (subject to passing Planning Policy Statement (PPS)25 Sequential and Exception Tests), it helps manage the flood risk better if some space can be provided within the site to accommodate some of the flood storage. The Leeds SFRA shows that there is a considerable amount of land within the District, which falls within zone 3a. This represents a serious potential flooding problem in Leeds. For this reason, when sites in zone 3a are being considered for redevelopment, the whole of the site should not be regarded as the developable area. There should be no net increase in the building footprint or changes in ground levels, or else compensatory storage volume should be provided. Where the sequential test is required, the developer is advised to agree the extent of the area of search with the Local Planning Authority.

4.8 The proportion of compensatory storage space that is required will be guided by the detailed Flood Risk Assessment which should be submitted alongside the planning application and which will also reveal flood issues, such as flow routes, which will need to be accommodated in the development. It is likely that more space for water will be required in zone 3aii than zone 3ai because of the greater flood risk. Most development is required to provide a proportion of open space and this requirement can be combined with the requirement to accommodate space for water. Where there are any flood risk issues associated with the development a Flood Risk Assessment will always be required.

Preferred Policy Position – Water 2: Development in Flood Risk Areas

All developments are required to consider the effect of the proposed development on flood risk, both on-site and off-site the detail of which should be commensurate with the scale and impact of the development. All development within zones 2 and 3a must:

- **Pass the Sequential Test and if necessary the Exceptions Test as required by PPS25.**
- **Make space within the site for storage of flood water, the extent of which to be determined by the Flood Risk Assessment.**
- **Must not create an increase in flood risk elsewhere.**

MANAGING THE RISK FROM FLOODING

4.9 The City Council is working in partnership with the Environment Agency to provide protection from flooding from the River Aire in the form of the Leeds Flood Alleviation Scheme. Additionally the Leeds SFRA identifies a small number of existing formal and informal raised flood defences which give localised protection against river flooding. The area behind the defence would be inundated with water should the defence fail during a flood, potentially posing a risk to people who are present at the time. These areas are defined as Zones of Rapid Inundation and are shown on Figure 3 in the Appendix.

4.10 National guidance (PPS25) does not place any specific restriction on development within these zones, however the PPS25 Practice Guide states that 'New development behind flood defences can increase the residual flood risk'. The Council considers it essential that the potential risk of defence failure is addressed in any planning applications for development within the Zones of Rapid Inundation.

4.11 There is always a residual risk that defences might fail, either by over-topping or breach. This residual risk depends on the height of the defences and the nature (construction) of the defence and therefore it varies for each Zone of Rapid Inundation within Leeds. Further consideration of this issue will be addressed in a future Site Allocations Development Plan Document. The overall policy approach towards Zones of Rapid Inundation is provided in the Policy below:

Preferred Policy Position – Water 3: Zones of Rapid Inundation

Where there is currently no built development within a Zone of Rapid Inundation then it should be regarded as if it were functional floodplain and there will be a presumption against anything other than water compatible uses or essential infrastructure.

Where development already exists in a Zone of Rapid Inundation, applications for further development will only be permitted where it can be demonstrated that residual risk of flooding is reduced to an acceptable level. A detailed breach analysis is required as part of the Flood Risk Assessment for applications in these areas. The PPS25 sequential and exception tests must also be passed.

4.12 It is important that for all development, consideration is given to flood risk. A Flood Risk Assessment should be provided for all sites. This needs to be commensurate with the degree of potential flood risk to the site and the potential impact of the development on flood risk to others. Where it is clear that

there is unlikely to be any flood risk to the site and no possibility of impact on others, then a simple statement to that effect may be all that is required:

Preferred Policy Position – Water 4: Flood Risk Assessments

All applications for new development will be required to consider flood risk, commensurate with the scale and impact of the development. Where, in the opinion of the Local Planning Authority (LPA), there is the possibility of any flood risk to the site, or the potential for flood risk impact on other sites, a Flood Risk Assessment is required.

The LPA is unlikely to support the development unless the Flood Risk Assessment demonstrates the following:

- **no increase in flooding on-site and elsewhere will result from the new development. The implications of climate change must be taken into account (these are predicted in Table B.2 of PPS25).**
- **there is less than a 3.33% chance of site flooding in any one year.**
- **there is less than a 1% chance of any premises on the site flooding in any one year, after allowing for the effects of climate change, and**
- **for flows beyond the 1% flood design event it is demonstrated that there are no unreasonable adverse impacts off site, after allowing for the effects of climate change.**

Developer contributions may be required for improvement works to ensure that the drainage infrastructure can cope with the capacity required to support the new development. This may include the cumulative effects of developments.

REDUCING SURFACE WATER FLOODING THROUGH MANAGING DEVELOPMENT

4.13 Local flooding is not just associated with rivers but occurs throughout built up areas (Figure B, Leeds SFRA). There is considerable flood risk associated with the finite capacity of culverts, drains and minor watercourses to accommodate locally intense rainfall and this is described in Appendix A of the SFRA. There is often little warning of this type of flooding compared with the flooding on the rivers Aire and Wharfe, where the Environment Agency has sufficient time to issue flood warnings.

4.14 Development increases the volume and speed of surface water run-off. PPS25 (Annex F3) recommends that the rate of surface water run-off arising from new development should be reduced to mimic the flow before the development was there. New Development should also reduce the flood risk to the site itself and elsewhere and take account of climate change (Annex F6).

4.15 Flooding is already a problem throughout the district and this is expected to worsen with climate change, therefore the Council is introducing a requirement for a 30% reduction in peak run off rates for sites that have previously been developed. The Practice Guide for PPS25 (paragraph 5.50) suggests developers should “reduce run-off rates from previously-developed sites as much as reasonably practicable”. The 30% reduction reflects a consensus view amongst Council drainage officers, the Environment Agency and the sewerage undertaker about what is “reasonably practicable”. Additionally, the Council has already been successfully applying this standard to development since May 2007 thus demonstrating that it is a feasible and viable requirement.

4.16 There is flexibility in terms of how to achieve the 30% reduction and there are a number of ways of doing this including the use of green roofs, planting, rain-water harvesting, permeable surfacing and Sustainable Urban Drainage Schemes (such as attenuation tanks below ground and ponds above ground). The Council has provided Supplementary Planning Guidance (SPG22: Sustainable Urban Drainage, June 2004) to assist with sustainable drainage schemes. The 30% reduction is based on the existing peak rate of discharge from the site prior to redevelopment, where that site is already connected to the drainage infrastructure.

Preferred Policy Position – Water 5: Surface Water Run-off

All developments are required to ensure no increase in the rate of surface water run-off to the existing formal drainage system. Change of use developments and conversions will be expected to incorporate sustainable drainage techniques wherever possible.

- **On previously developed sites peak flow rates must be reduced by at least 30%**
- **On sites which have not previously been connected to the drainage infrastructure, or watercourse, surface water run off rates will not exceed the 'greenfield' run-off rate (i.e. the rate at which water flows over land which has not previously been developed).**

Applications for development are expected to comply with the Council's Minimum Development Control Standards for Flood Risk (shown as Figure 1 in the Appendix).

4.17 Since the publication of the Issues and Alternative Options report, the General Permitted Development Rights Order has been reviewed which sets out what works can be undertaken without the need to apply for planning permission. Planning permission is now required to lay impermeable driveways or other impermeable surfacing between a building and the highway. The Council considers that this advice is also appropriate to all extensive areas of hard standing.

4.18 Leeds is identified as a regional city in the Regional Spatial Strategy and therefore must provide for the functions of a regional city. This includes the need to provide large surfaced areas such as events spaces and surface car parks. These large surfaced areas contribute significantly to flash flooding and therefore it is prudent to encourage them to be constructed from permeable materials, which help to manage flood risk better. Permeable materials should be the starting choice unless there are sound reasons why impermeable surfacing should be accepted.

4.19 There are ongoing discussions as to whether Leeds should extend this requirement to rear gardens. A review into flood risk (the Pitt Review) recommends 'Householders should no longer be able to lay impermeable surfaces as of right on front gardens and the Government should consult on extending this to back gardens and business premises'.

4.20 Rear gardens continue to be regarded as brownfield land in terms of national planning (the House of Commons recently rejected a change to give special regard to preserving gardens and groups of gardens in the Planning Act) and any subsequent increase in building may further increase the speed of surface water run-off in urban areas.

4.21 The impact of climate change may mean that during the plan period Leeds City Council may have to consider ways to reduce the paving over of rear gardens in areas where surface water run-off is

causing significant flooding. One option may be to consider the removal of some of the permitted development rights that allow people to build minor forms of development without the need for planning permission. This would allow us to manage flood risk better in key critical areas. We will improve our understanding of the impact of unplanned development on surface water flooding as we develop Surface Water Management Plans for the District. The first pilot plan is being undertaken in the Wyke Beck Area.

4.22 The Surface Water Management Plans may be used to help the Council to identify where Permitted Development rights may be removed during the Plan period

WATER EFFICIENCY

4.23 The Natural Resource Flow Analysis (2008) found that overall water consumption within Leeds is higher than average. Increased water efficiency should therefore be encouraged. The Issues and Alternative Options Report promoted the use of measures to improve water efficiency within new developments (Issue 34) and a large majority of respondents supported this. Issue 35 took this further and asked whether a criteria-based policy for all new development or only for major developments would be appropriate. The former was supported by a large majority.

4.24 The preferred approach is to cover the two issues of water efficiency by one policy which:

Preferred Policy Position – Water 6: Water Efficiency

Requires all new developments to include measures to improve their overall water efficiency. This will be achieved through a mix of appropriate systems to use less treated water and reduce wastewater such as:

- **sustainable urban drainage systems,**
- **rainwater collection and storage,**
- **grey water recycling and storage systems, and**
- **more absorbent surfaces for water drainage.**

PROTECTION OF WATER QUALITY

4.25 Local authorities must address any targets for water quality improvements as required by the Water Framework Directive (2000). This covers both surface and groundwater sources and the Environment Agency are responsible for classifying and monitoring the quality of these water sources. Managing flooding, driving water efficiency in new development will contribute to maintaining and improving water quality issues within the Leeds area. Issue 32 of the Issues and Options report suggested the protection of sensitive water bodies (such as the Leeds - Liverpool Canal which is designated as a Site of Special Scientific Interest) from any adverse impacts. The majority of respondents agreed with the need for both a criteria-based policy to protect such water bodies against adverse impacts, and for these sensitive areas to be defined so that adjacent development should not be allowed to compromise the quality of water resources. Therefore, the preferred way forward is for a policy which:

Preferred Policy Position – Water 7: Protection of Water Quality

Identifies sensitive water bodies to protect their water quality from any adverse impacts of adjacent developments. The policy should also require all developments to meet criteria which will minimise any adverse impacts on water quality. This will preferably include defined zones where more stringent criteria can be applied around these water areas.

SUPPORTING FIGURES AND PLANS

4.26 This section of the NRWDPD is supported by Figures 1and 3 in the Appendix and by Leeds City Council's Strategic Flood Risk Assessment.

SAVED POLICIES

4.27 The table below sets out the saved UDP policies that are particularly relevant to this chapter.

Relevant Water Resources UDP Saved Policies

UDP Policy No	Summary of Content	Comment
N38A	Development not permitted in functional flood plains unless for appropriate open space, recreational use etc. or essential infrastructure.	*Relevant to Water 1*
N38B	Planning applications to be accompanied by a flood risk assessment where necessary.	*Relevant to Water 4*
N39A	Requirement for SUDS	*Relevant to Water 5 and 6*
N39B	Culverting of Watercourses not permitted	*Relevant to Water 5 and 7*

We would like your comments on any of the above policy positions. Please use the policy reference in your response.

5 AIR QUALITY

NATURAL RESOURCE FLOW
ANALYSIS KEY FACTS

- Housing and transport greatest contributors to carbon emissions
- 8 small Air Quality Management Areas in Leeds
- CO_2 per person lower than national average
- Dangers of increased pollution from increasing road traffic and aircraft movements

SUSTAINABILITY APPRAISAL OBJECTIVES

- To promote new fuel technology
- To site potentially polluting developments appropriately
- To minimise air pollution, especially carbon emissions

PATTERNS OF PUBLIC RESPONSE

- Improve air quality of developments
- Adapt to climate change

PLAN OBJECTIVES FOR AIR QUALITY

5.1 Clean air is a vital natural resource and the Air Quality Strategy (DEFRA 2007) sets out health based national standards and objectives for eight specific pollutants within the UK. In addition, local planning policies should aim to minimise carbon dioxide emissions. On average, every gallon of petrol used produces 10.4 kg of carbon dioxide and every gallon of diesel produces 12.2 kg of carbon dioxide. Within Leeds, housing and transport are the major sources of carbon emissions that currently average 6.44 tonnes per person per year (3.8 for housing and 2.64 for transport). These levels are below the English national average of 6.54 tonnes of carbon per person per year. Air quality across the city is generally good (see Figure 4), but there are eight small Air Quality Management Areas (AQMAs) where the national air quality objectives are not achieved. Seven of these AQMAs are associated with city centre traffic hotspots near the inner ring road and M621, where there is a high background concentration of pollutants (the eighth was declared for emissions in a coal burning area to the east of the city). All local authorities are required to work towards achieving the national air quality objectives and Leeds is no different in this respect. Leeds has produced an Air Quality Action Plan to indicate the actions we intend to take to address air quality. This includes controlling emissions, limiting the impact of any proposals and locating development appropriately.

AIR QUALITY MANAGEMENT

5.2 In the Issues and Alternative Options Report, Issues 36-38 asked whether air quality policies should be included within the NRWDPD or whether they should be addressed in other DPDs such as housing, retail and employment; how the NRWDPD should deal with industrial developments that cause air pollution; and to which locations air quality policies might be best addressed. A marginal majority suggested that air quality policies might best fit into other relevant DPDs; a majority of respondents thought there should be a presumption against developments which may impact upon air quality; and a marginal majority thought that any restrictions on developments to address air quality should cover the whole Leeds City Council area.

5.3 The Community Strategy states that Leeds will make sure that all parts of the City meet national air quality standards, therefore policy action is needed all over the District and not just in AQMAs. A major part of the policy response is the appropriate location of development to reduce the need for people to travel and this is dealt with in the Core Strategy. However, within the NRWDPD the Council has developed a policy to ensure that air quality issues are also considered when specific applications for development come forward. Guidance on how development can mitigate for air quality problems will be expanded upon in more detail by a further Air Quality Supplementary Planning Document. Therefore, the direction is for policy which:

Preferred Policy Position – Air 1: Air Quality Management of Developments

Requires all new developments to incorporate measures commensurate with the scale of the development to ensure their overall air quality impact (including unpleasant odours) supports the improvement targets for air quality in place at the time through a mix of appropriate air quality management systems. It may be applicable to carry out Health Impact Assessments for some proposed developments.

5.4 It is important to address the air quality issue in the existing AQMAs and to seek to reduce pollution levels in other areas of the city, particularly where the major source is emissions from road traffic. No single available option will address the problem but through the Air Quality Action Plan, the Council presented a series of proposals to reduce air pollution concentrations. The Air Quality Actions which are of most relevance to spatial planning include promotion of public transport, cycling and walking, integrated transport systems (such as park and ride), requirements for travel plans and section 106 contributions for public transport improvements, planning for biofuels and associated infrastructure and the creation of Low Emission Zones where appropriate. More recently, as a result of sharing ideas and knowledge with the 'Delivering Cleaner Air' Beacon Authorities, a Low Emission Strategies guidance document has been produced and was launched on 30 November 2009. This will be included in a detailed Air Quality Supplementary Planning Document which will include those measures currently adopted in the UDP and others not yet embedded in the process – including for example, Low Emission Zones, The Council is therefore considering policies which:

Preferred Policy Position – Air 2: Low Emissions Zone(s)

Support in principle, the identification of Low Emission Zones where they are needed and other appropriate Low Emission Strategies throughout the District.

SUPPORTING FIGURES AND PLANS

5.5 Figures 4, 4a, 4b and 4c in the Appendix give supporting information on air quality (2005).

SAVED POLICIES

5.6 There are no saved UDP policies that are particular to this topic.

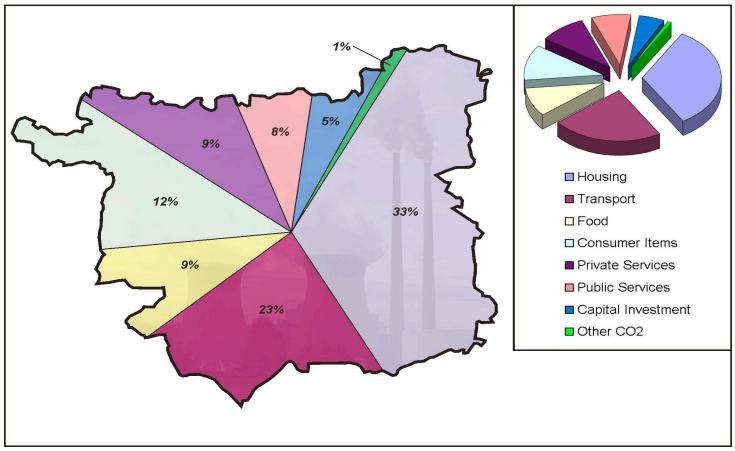
We would like your comments on any of the above policy positions. Please use the policy reference in your response.

6 ENERGY

Diagram 7 – Leeds CO_2 by Source (NRFA 2008)

KEY FACTS:

- Leeds imports most of its energy
- The minimum regional target for installed grid-connected renewable energy capacity has not been met in Leeds
- There are some physical limitations to some new energy generating technologies



Total CO_2 emissions for Leeds = 6.1M tonnes

SUSTAINABILITY APPRAISAL OBJECTIVES

- To support renewable and low carbon energy development proposals
- To encourage energy microgeneration
- To increase potential for energy from waste

PATTERNS OF PUBLIC RESPONSE

- Increased energy efficiency
- Increased energy generation from renewable sources
- Reduced reliance on energy generation from high carbon sources

PLAN OBJECTIVES FOR ENERGY

6.1 Energy is a key area to plan for in order to help slow down the effects of climate change and help safeguard the security and diversity of the UK's energy supply. National planning policy encourages a 10% reduction in the use of fossil fuels and a rapid transition towards renewable and low-carbon energy generation. A majority of respondents to the Issues and Options Consultation (Issue 20) support the desire to increase energy generation from renewable sources in the Leeds district. Respondents also support a reduction in the demand for energy through increased energy efficiency.

6.2 Current energy production within the Leeds area does not meet the needs of the population. As a result, the City is highly reliant on imported energy from outside the Leeds area and most of this energy is produced from fossil fuels. An active approach that is flexible towards renewable energy-generating technology must, therefore, be adopted in Leeds in order to encourage renewable energy generation in the district. National and regional energy targets underpin this by setting a target upon Leeds to produce at least 75MW of installed grid-connected renewable energy capacity by 2021. Leeds currently produces around 9MW.

6.3 Although it is clear that in the short term fossil fuels will continue to be used as a primary energy source, Leeds is committed to increasing the amount of energy derived from renewable sources. The environmental benefits of renewable energy are mainly linked to the contribution it has towards

reducing the harmful effects of climate change, without action climate change will jeopardise the landscape, biodiversity and human activities across Leeds.

6.4 Renewable energy can also bring about social and economic benefits, which are material considerations when assessing planning applications. Amongst other benefits, renewable energy developments can create jobs; support rural diversification; power homes, buildings and businesses off the grid; and, support community schemes and infrastructure. Development comprising technology capable of producing renewable energy, both at a commercial and micro scale, is therefore encouraged.

6.5 However, careful consideration also needs to be given to any effects that may arise from renewable energy proposals. Schemes need to be well designed, reflect local circumstances and demonstrate how any environmental, social and economic impacts have been minimised through careful site selection, design and other measures. These issues are also material planning considerations and as such, these issues will need to be addressed on a site by site basis to determine the most acceptable scheme for a site.

6.6 In consideration of these issues the main objectives for change in Leeds are:

- using energy more efficiently to reduce energy demand
- safeguarding future opportunities for flexibility in energy generation
- promoting sustainable or renewable energy generation
- reducing carbon production in energy generation

ENERGY EFFICIENCY

6.7 The Core Strategy includes policies that will support sustainable construction issues and increasing energy efficiency in new development. Although energy efficiency is not specifically identified in the Issues and Options report, it is clearly important as a means to support the NRWDPD vision with a policy to use energy more carefully, especially from fossil fuels, so as to reduce emissions. The Policy wording for this is being advanced in the Core Strategy however given its relevance to the nature of the NRWDPD it is appropriate to reiterate that the Council's approach is for a policy which:

Preferred Policy Position – Energy 1: Energy Efficiency in New Development

Will require new developments to be more energy efficient through sustainable construction techniques and throughout their lives by other measures; and will encourage the improvement of the energy efficiency of existing developments.

RENEWABLE ENERGY GENERATION

6.8 Issue 20 of the Issues and Alternative Options report asked what the focus should be for the primary energy sources of the future and a majority of respondents supported encouragement of renewable technologies compared with a minority in favour of the continuing reliance on fossil fuels. The renewable energy produced in Leeds so far derives from the landfill gas electricity generating facilities across the district but the amount generated is not enough to meet the Government's pledge to reduce reliance on fossil fuels. It should also be recognised that landfill gas generation will decrease with time as the resource diminishes and as we move away from landfill. Alternative sources of renewable energy should therefore be encouraged and supported. .

6.9 Issue 22 of the Issues and Options report set out a variety of renewable energy technologies and asked which technology was the most appropriate for Leeds. Solar power, energy from waste, and wind turbines were ranked as the most important potential renewable energy sources for Leeds, with hydropower and biomass as the least important. When asked how people felt the Council should provide guidance to identify sites for renewable energy technologies (Issue 23), most people thought that the NRWDPD should provide both criteria-based policies and specific spatial guidance.

6.10 Issue 24 of the Issues and Options report dealt with the provision of renewable energy in new developments to help lower carbon emissions. A majority of respondents thought that this should apply to all new developments, irrespective of size, while about a third thought there should be some specified threshold. This view reflects that of the RSS which states that local authorities should set local level thresholds and proportions of local renewable and low carbon energy for supplying new developments. It has been decided that this issue is strategically important for the future of Leeds, and that therefore the Core Strategy should contain a policy which deals with the key principles involved, including what targets should be set.

Future Renewable Energy Generation Requirements

6.11 In order to address the commitment of the Council to increasing energy production from renewable sources and to strive to deliver the RSS target of 75MW for the Leeds area by 2021, significant encouragement of all renewable energy generation technology will be required. Of the viable technologies, wind power and Energy from Waste are likely to offer the greatest new potential contributions as shown below.

Estimated Installed Grid Connected Renewable Energy Generation Capacity (MW) for the Leeds district:-

	Current Production Levels (MW)	Potential Contribution (MW) 2021	Comments
Landfill Gas	9	12	Takes account of permissions for Peckfield and Skelton Grange, however these will reduce post 2021 with reductions in landfill.
Wind Power	0	40	Based on an estimate that the district could possibly accommodate a maximum of 20 large turbines.
Micro-generation Including solar power, ground and air source heat pumps	0	10	Allowing for half of future house development to have solar installations.
Energy from Waste	0	15	Based on current potential for plants to be brought forward
Hydro-power	0	<2	Based on known multiple, small-scale potential developments
Energy from biomass	0	2	Based on potential for a plant using organic waste (e.g. food, green waste)
Total	9	<81	

6.12 The following policy positions aim to encourage and enable renewable energy technology to be developed in Leeds. Different technologies have different development needs reflected below.

Wind Power Generation

6.13 Wind energy development has a key role to play in the delivery of the Government's commitments on both climate change and renewable energy. Large-scale installed grid-connected wind energy development can significantly contribute to meeting Leeds' targets. Smaller-scale wind energy development and individual wind turbines make a more limited contribution, but can provide a valuable input to overall outputs of renewable energy and to meeting local energy needs.

6.14 Figure 9 provides a generalised indication of Leeds' wind resource by providing estimated mean wind speed data for Leeds in metres per second and measured 45 metres above ground level. This suggests that wind energy development would be viable in the Leeds district. The wind resource is greatest away from the more built-up central district areas and main river valleys of the Wharfe and Aire. Wind speeds tend to increase with altitude, away from turbulent air at lower levels, therefore, the greatest potential for commercial wind energy development appears to be in the more upland areas of the district. Figure 9 does not take into account that wind energy developments are now being built in areas of low wind speed or the technical, environmental or cultural constraints that may affect land. Neither does it provide a basis for individual development decisions.

6.15 Some of the windiest parts of Leeds fall within nationally recognised designations (Sites of Special Scientific Interest, Scheduled Monuments, Conservation Areas, Listed Buildings, Registered Historic Battlefields and Registered Parks and Gardens apply). Planning permission for wind energy development, as with all type of renewable energy projects, will only be granted where it can be demonstrated in a planning application that the objectives of designation of the area will not be compromised by the development. Likewise, any significant adverse effects on the qualities for which the area has been designated should be clearly outweighed by the environmental, social and economic benefits. It is likely to be the case that only small-scale developments are acceptable in such areas.

6.16 The following policy provides guidance on how all wind energy development proposals across the district will be considered. They will be judged on their individual merits and against the requirements of national and regional guidance:

Preferred Policy Position – Energy 2: Wind Energy

The acceptability of a wind energy development will be judged on whether its energy contribution and other benefits can be shown to outweigh any significant impacts on:

- **the character and appearance of the landscape or townscape;**
- **the landscape and outlook arising from any cumulative effects with existing, permitted or other proposed development;**
- **the amenity of the living and working conditions of occupants of nearby property by reason of visual impact, noise, shadow flicker or reflected light;**
- **any nationally important designation, including their visual amenity and setting;**
- **areas of ecological importance;**
- **transport infrastructure and highway safety;**
- **civilian and military aeronautical radar services or the operation of aerodromes and their protected surfaces; and,**
- **telecommunications and television reception.**

In addition proposals shall provide for reinstatement of the site through the removal of the facilities should it cease to be operational or upon decommissioning.

In assessing proposals against the requirements of this policy, full account will be taken of proposed mitigating measures.

6.17 As there are already a number of wind energy developments across Yorkshire it is likely that increasing significance will be attached to the cumulative effects of their geographical distribution. Cumulative effects may occur as a result of more than one scheme being constructed and is the combined effect of all the developments, taken together. This may be in terms of their effect on landscape and visual amenity, bird populations and other wildlife, the historic environment, the local economy or any other matter. Therefore, where a scheme is being proposed in an area with another proposed, consented or operational scheme a cumulative assessment should be carried out to determine the overall effect on issues such as landscape character, visual amenity and nature conservation interests. These and other planning issues might limit the amount of wind energy development that can take place in some parts of Leeds, unless overriding social, economic or environmental benefits are demonstrated.

Micro-generation (excluding wind)

6.18 Micro-generation is defined as, 'the production of energy on a small scale from a low carbon source' (Local Government Yorkshire and Humber Renewable Energy Toolkit (2009)). Cumulatively, solar panels, heat pumps and wind turbines up to 50kW, as outlined in sections 26-29 of the Issues and Options report, have the potential to make a significant contribution to Leeds renewable energy targets and requirements. The majority of consultation responses supported the encouragement of such technologies. Wind generation policies have been discussed above and the following policies cover other micro-generation technology: hydro-power (water), solar power and ground source heat pumps

6.19 Hydro-power utilises water flow or fall to generate electricity and it can be used for individual properties, or a local set of properties. Although small scale hydro schemes can often prove difficult for developers

to pursue on economic and environmental grounds, most respondents thought that the Council should examine the potential for this technology in specific areas. The viability of such schemes is being considered within Leeds.

6.20 In 2002, a Renewable Energy Assessment Study (REAS) was carried out which identified fifty-four sites across the region for hydro-power units. Within the Leeds area, three sites were identified at Wetherby, Otley and Boston Spa. More recent studies indicate that there are possibly ten sites with potential to produce up to 2MW in total in the Leeds District. With improvements in technology advancing all the time the Council does not wish to constrain the development of this technology by limiting it to specific sites and so a criteria based approach is proposed.

6.21 In 2008, permitted development rights for householders were amended so that domestic solar micro-generation technology no longer requires planning permission, subject to certain conditions being met. Consultation on Issues and Options asked whether Leeds should consider writing to the Government to support streamlining permitted development rights so that fewer of the other micro-generation technologies require planning permission (Issue 28). The majority of respondents (70%) agreed with this proposal. Until any future time when permitted development rights may be further amended by Government, Leeds need to encourage micro-generation technology while ensuring that installation is appropriate.

6.22 To allow proposals for micro-generation (other than wind which is covered above and domestic solar power under 50kW which no longer requires planning permission) to be supported, Leeds will outline the local criteria that micro-generation technologies will have to satisfy:

Preferred Policy Position – Energy 3: Micro-generation Development

The Council will encourage proposals for micro-generation technologies, provided that they satisfy certain criteria including:

- **Landscape protection;**
- **Visual amenity;**
- **Noise;**
- **Safety; and**
- **Conservation of the built environment.**

Energy from Waste

6.23 Leeds City Council is working to reduce the amount of waste produced and to fulfil the ultimate aspiration for a zero waste city by regarding waste as a resource that can be reused. Energy from Waste (EfW) has been the subject of much research and is becoming widely implemented in the UK. EfW facilities contribute to the aims of the National Waste Strategy by promoting the recovery of energy over waste disposal to landfill, whilst promoting sustainable energy generation. EfW facilities use municipal household waste to generate power. Other facilities can use biomass such as food or green waste to produce energy. The Council therefore defines an approach to Energy from Waste whereby:

Preferred Policy Position – Energy 4: Energy from Waste

The support of sustainable energy generation methods such as Energy from Waste and supporting infrastructure providing that:

- **The facility has an identified outlet for any energy produced;**
- **The development would not cause detrimental environmental effects;**
- **A study of alternative options has been considered; and**
- **Financial viability has been assessed.**

Combined Heat and Power (CHP)

6.24 CHP is the generation of heat and power at the same time, thereby preventing the wastage of heat which would normally be lost (such as in cooling towers). It is an established technology and can be implemented to support a district heat network. Option 2 of Issue 20 in the Issues and Options report asked whether the Council should plan for and invest in CHP and district heating as a major provider for the City. This was supported by a majority of respondents and is considered to form an important part of the overall NRWDPD strategy. The preferred approach is therefore to include a general enabling policy which:

Preferred Policy Position – Energy 5: Heat and Power Recovery

Seeks to encourage the application of CHP to current and future development throughout the District where appropriate.

Heat Distribution Networks

6.25 Heat distribution networks deliver heat from a central generation source to a district via hot water or steam. They can utilise heat from local industry that would otherwise be wasted or can be linked to power generation technology such as CHP. Central generation technology can also combine heat, power and cooling (trigeneration) to allow response to seasonal demands of heat. By comparison with the traditional methods of distributing fuel, heat distribution is safe, clean and efficient and also removes the need for space heaters or boilers. It is versatile in the sense that it can serve the heating and hot water demands of individual buildings or larger commercial and industrial complexes or districts of housing.

6.26 The Council acknowledges that using heat that would otherwise be wasted to facilitate community or district heating (potentially housing and/or commercial or industrial uses) would contribute to reducing CO_2 emissions and accord with Government Policy and the White Paper on Energy: 'Meeting the Energy Challenge' (2007). It would also support low-carbon homes in accordance with the Code for Sustainable Homes (2006) and help achieve other Government aims relating to heat distribution.

6.27 It is the Council's aim to build upon existing research and best practice regarding this technology and to investigate this further by producing a mapped assessment to define the most appropriate locations for District Heating Networks. Implementing such a network in an existing development is likely to be

extremely difficult or costly and opportunities are most favourable in new developments. The Council's policy position regarding the implementation of this distribution technology is defined as:

Preferred Policy Position – Energy 6: Heat Distribution infrastructure

The promotion of heat distribution infrastructure will be supported providing that the following are undertaken and are satisfactory:

- **An assessment of viability based upon need and appropriateness of the area;**
- **An assessment of environmental effects;**
- **A study of alternative options considered; and**
- **Appropriate financial contributions are clearly defined.**

WORKING IN PARTNERSHIP

6.28 Issues 25 and 30 asked whether the Council should take opportunities to work with other agencies / local authorities, including adjacent ones, to improve energy resource efficiency. The majority of respondents agreed with this approach.

6.29 Within this context Leeds is liaising with neighbouring authorities and is currently exploring the formation of a strategic body ('Energy Leeds') that will encourage all major new developments in the sub-region to investigate the potential for renewable energy technologies. This body will employ delivery vehicles such as Energy Service Companies (ESCo's) which are tailored to meet the needs of specific projects or initiatives in order to deliver low carbon projects. The preferred option is for a policy which:

Preferred Policy Position – Energy 7: Renewable Energy Promotion

Promotes a strategic body that can work with regional / sub-regional partners and developers to encourage major renewable energy developments, subject to criteria which identify community needs, economic opportunities and environmental constraints.

SUPPORTING FIGURES AND PLANS

This section is supported by Figure 9 in the Appendix showing wind speed at 45m above ground level.

SAVED POLICIES

- The table below sets out the saved UDP policies that are particularly relevant to this chapter.

Relevant Energy UDP Saved Policies

UDP Policy No	Summary of Content	Comment
N54	**Development of Renewable Energy** Proposals for the development of Renewable Energy Resources will in general be supported in accordance with the principles of the Green Strategy and the securing of Sustainable Development. They will be assessed against Policy GP5 and national planning guidance.	*Relevant to Energy policies*

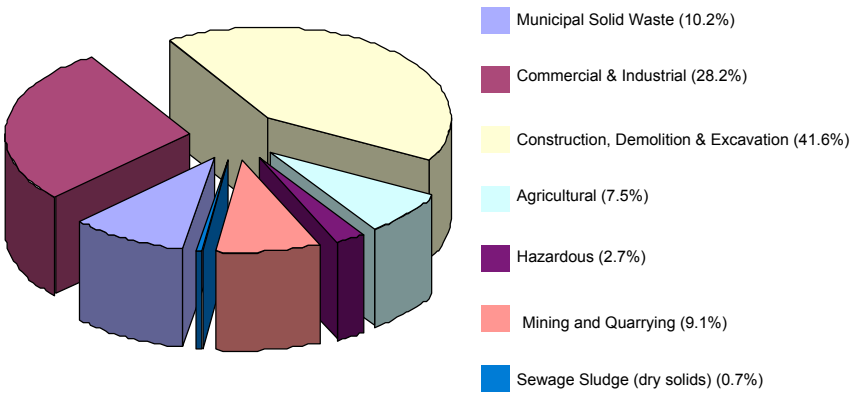
We would like your comments on any of the above policy positions. Please use the policy reference in your response.

7 WASTE

NATURAL RESOURCE FLOW ANALYSIS KEY FACTS

- Construction and demolition waste is the largest proportion of the waste stream, followed by Commercial and Industrial and then Municipal Waste.
- Overall waste generation for Leeds is below the national average but the amount of waste is still projected to grow during the plan period.
- The current recycling rate for household waste in Leeds is 30%.

Diagram 8 – Total Waste Arising in Leeds (% of Total by Type) (Source: Natural Resource Flow Analysis, 2008)



SUSTAINABILITY APPRAISAL OBJECTIVES

- To maintain adequate waste sites and facilities.
- To manage waste on-site or at nearest location.
- To reduce growth in waste and the amount sent to landfill.

PATTERNS OF PUBLIC RESPONSE

- Provide additional waste management sites.
- More recycling, reuse & composting.
- Protect existing waste management sites.
- Work with adjacent Local Authorities.
- Provide a more sustainable movement of waste.
- Seek the co-location of waste management facilities.

PLAN OBJECTIVES FOR SUSTAINABLE WASTE MANAGEMENT

7.1 At first sight, waste does not appear to be a natural resource as it is usually a by-product of the way natural resources are used and is a result of the disposal of products made from them. Ideally the amount of waste we produce should be reduced. When waste is produced, it can become a potential resource in its own right because it can be reused, recycled into new usable products, broken down into organic material or treated to provide energy through fuel or energy recovery as a by-product.

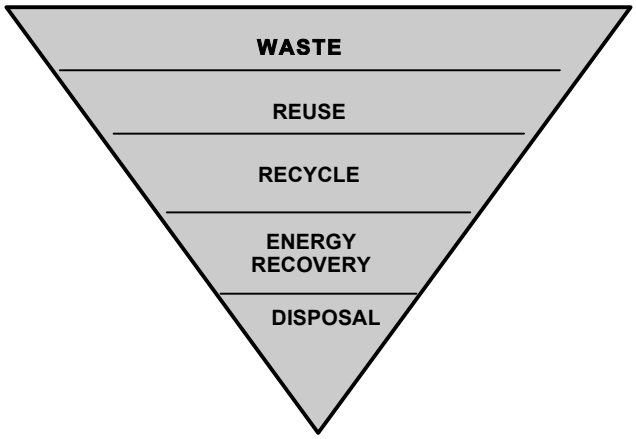
PLANNING FOR SUSTAINABLE WASTE MANAGEMENT

7.2 Spatial policies are needed to minimise the volumes of waste produced in Leeds and to manage waste in a more sustainable way in order to meet the European Waste Framework Directive for reducing the amount of waste sent to landfill and to deliver the Council's vision for waste contained in the Integrated Waste Management Strategy for Leeds 2005-2035.

7.3 The NRWDPD must include policies for how all types of waste will be managed in the future. This includes waste generated by households, business, industry, construction and demolition, agriculture, sewage treatment and hazardous waste.

7.4 National planning guidance (provided by PPS10: Planning for Sustainable Waste Management), The Yorkshire and Humber Plan (the Regional Spatial Strategy), and the saved Leeds development policies (Leeds UDP) address each stage of what is called 'the waste hierarchy'. The policies in this NRWDPD must do likewise. European, national, regional and local targets on waste management require waste to be diverted away from landfill and to move it up the waste hierarchy. The waste hierarchy is a 5-stage approach to achieving sustainable waste management as shown by the triangle below.

Diagram 9 – The National Waste Hierarchy



7.5 "Prevention" involves minimising the amount of waste produced overall. The actions to achieve this do not necessarily require spatial planning policies and need wider ranging initiatives at a global and national level, for example, through manufacturers and retailers reducing the amount of packaging in products. However, more can be done and encouraged at a local level through changing some of the everyday decisions which we make. As this plan must make provision for managing the amount of waste which Leeds produces as a City, reducing the amount of waste produced in the first place will reduce the pressure to provide land to manage this waste.

7.6 The means by which to achieve effective waste reduction are set out in the Integrated Waste Strategy for Leeds 2005-2035 (IWS). This sets out the City's ultimate aspiration for zero waste where waste that cannot be prevented is seen as a resource to be exploited through reuse, recycling and recovery of value. Waste reduction and reuse through reducing the historically high growth in waste provides a primary focus for the IWS. The target agreed by the City Council in 2007 is to reduce the annual growth in waste per household to 0.5% by 2010 and to eliminate growth per household by 2020.

7.7 Recycling and organic waste treatment is a major element of the IWS and a target to achieve a combined recycling and composting rate of greater than 50% of household waste by 2020 was agreed by the Council in September 2007. During 2008/2009, the Council achieved a recycling and composting rate of 30.4%.

7.8 To reflect these objectives, the IWS has the following aspiration for Leeds whereby the amount of waste sent to landfill is reduced as much as possible:

"Our vision is of a zero waste city, whereby we reduce, reuse, recycle and recover value from all waste, waste becomes a resource and no waste is sent to landfill".

Meeting the Future Waste Management Needs for Leeds

7.9 Additional recycling, organic waste treatment, waste transfer, bulking and sorting and residual waste treatment capacity will be required to provide more sustainable waste management. The NRWDPD must plan for additional capacity both at existing waste management sites and through identifying land for new waste management facilities. All the sites that are required to support this objective are shown on Maps A1 and A2 and detailed individual maps for each site can be found in the separate Mapbook.

7.10 For waste collected mainly from households by the Council (municipal waste), the Council is implementing a Waste Solution Programme to deliver the targets for recycling, composting and landfill reduction. This includes measures to change the way in which waste is collected and which will put in place new contracts in terms of the way in which waste is managed. For all other waste streams, which the Council does not influence as much, additional capacity will also be required in much the same way as for municipal waste.

7.11 The NRWDPD needs to take a long term view and be flexible enough to accommodate a wide range of possible future waste management choices. The delivery of the NR&WDPD strategy needs to provide the right balance between the different waste management methods in the waste hierarchy and should not be dependent on a single technology choice or stifle the waste management industry coming forward with innovative solutions.

7.12 Many of the consultation responses to the Issues and Options report agreed that the first priority for Leeds should be to ensure that it meets its own waste needs i.e. for it to be self-sufficient in terms of managing its own waste. Although the RSS is clear that cross boundary waste flows should be taken into account in plan-making, it sets out future capacity requirements for each waste planning authority. The NRWDPD must plan to achieve these capacities.

7.13 Although inter-boundary waste flows are difficult to establish, clearly waste management operates beyond local authority boundaries. Work undertaken by the Yorkshire and Humber Regional Assembly suggests that the West Yorkshire sub-region is reasonably self-sufficient in term of meeting its own waste requirements. Overall, 80% of waste generated within the Yorkshire and Humber Region is managed within the Region with the main outflows to the adjoining North West and East Midlands Regions. The RSS seeks to reduce the transportation of waste through managing waste at the nearest appropriate location to the place where it is generated.

7.14 There are already existing waste management facilities within Leeds which serve a wider sub-regional and regional catchment area. It is likely that during the period of the NRWDPD new waste management proposals will come forward which will also accept waste from outside Leeds, particularly for example Commercial and Industrial (C&I) waste. Policy ENV13 of the RSS is clear that Waste Planning Authorities must recognise the need to plan for cross boundary waste flows.

7.15 Taking all the above factors into account, the preferred spatial principle for the NRWDPD is for Leeds to be self sufficient in terms of planning to meet its own waste management needs. In spatial planning terms this means increasing the overall waste management capacity to meet this need as this will reduce the overall transportation of waste. However, it is also recognized that the regional role of the City means that there are likely to be opportunities in the future where waste management operators may seek facilities within the City which serve a wider catchment beyond the City boundary.

Preferred Policy Position - Waste 1: Self-sufficiency for Future Waste Management in Leeds

The Council will support and pro-actively approach waste prevention with its regional partners and other stakeholders. It will actively encourage minimisation and reuse in new development.

The NRWDPD will plan on the principle that Leeds will manage its own waste and provide for additional capacity to meet the requirements set out in the RSS. This will seek an appropriate balance with regard to the waste hierarchy and work towards meeting the Integrated Waste Strategy vision for Leeds.

Where strategic opportunities exist within Leeds to meet the wider needs of the West Yorkshire Sub-Region, the City Council will work with sub-regional partners to achieve a net balance of waste management facilities across West Yorkshire.

LEGISLATIVE FRAMEWORK AND EVIDENCE BASE

7.16 The Natural Resource and Waste Development Plan is required to meet the specific requirements of the European Union Waste Framework Directive (EC Directive 2006/12/EC) to direct waste up the waste hierarchy and provide details of the geographical location of waste management facilities and/or location criteria based policies against which future proposals can be considered.

7.17 The EU Landfill Directive (99/31/EC) is also an important piece of underpinning legislation as it seeks to prevent as far as possible, potential negative effects from landfilling of waste and sets landfill targets which have been transposed into UK legislation. There are also a number of other important Directives governing the disposal of Batteries, End of Life Vehicles (ELV), and Waste Electrical and Electronic Equipment (WEEE). These are described in more detail within the Background Waste Research Report which accompanies this Plan.

7.18 The Waste Strategy for England 2007 is a major driver for sustainable waste management and its objectives are reflected in the Leeds IWS.

7.19 The NRWDPD should not unnecessarily repeat the policies and requirements of national and regional planning documents and aims to put locally distinctive policies in place. However, where appropriate, the NRWDPD will utilise criteria already set out in national (PPS10) and regional planning (RSS). The existing Saved Policies of the Leeds UDP will also be used where it is appropriate to do so and new policies introduced where they are necessary to deliver a particular objective for the Leeds area.

7.20 So that the legislative framework is met, the waste policies of the NRWDPD are underpinned by evidence in a number of waste reports specific to Leeds outlined below. These, and the other

evidence used such as the sustainability appraisal and the results of the Issues and Alternative Options consultation, are available to support this Plan:

- The **Background Waste Research Report 2008**: This is a detailed technical report reviewing the total amount of waste to be managed in Leeds including: existing waste management destinations and capacity; future requirements; waste management targets and a description of the types and technology which will need to be engaged to achieve these targets. It applies two separate growth rates: one based on the Waste Strategy for England Growth rates and another based on more specific social and demographic growth factors for Leeds. As the Waste Strategy Growth Rates give the higher capacity figures, these have been used to form the basis of this report as they provide the upper limit (or 'worse case scenario') in terms of what future capacity needs to be planned for.
- The **Municipal Waste Site Requirements Report 2009**: This report specifically looks at the capacity requirements and the provision of enhanced or new waste management facilities which will be required to meet the recycling and composting targets for MSW as well as the need for waste transfer, bulking and sorting. It also sets out the planning and operational criteria which are important to identify the types of locations suitable for different waste management purposes and how they will need to be reflected in the policies of the NRWDPD.
- **Safeguarded Waste Sites Assessment 2009**: This assessment constitutes a detailed review of existing waste management sites in Leeds and, as far has been practicable, identified the existing waste management capacity currently available on these sites. This work has then applied a hierarchy in terms of: which sites may not remain operational during the plan period or are generally unsuitable locations but exist for historic reasons; those which should remain operational and be safeguarded for a continuation of waste management uses and individual sites or groups of sites together which might be suitable for the expansion of existing uses or new facilities.
- The **Site Selection Study 2007** and **Update Addendum 2009**: This is a city-wide site selection study to identify potential sites for strategic waste management facilities. Strategic facilities have been defined as Residual Waste Treatment Facilities and sites which have the potential for locating another waste management facility together on the same site as the treatment facility ('co-location'). The original study was completed and published as part of the Councils Waste Solution Programme in 2007. An addendum to review and update the study findings in the context of the NRWDPD was completed in 2009 to update and validate the findings
- The **Integrated Waste Management Strategy** for Leeds (IWS) is also important in underpinning the plans objectives although it is not a formal part of the evidence base.
- Other sources of specific data, such as the National Waste Strategy for England 2007 and monitoring reports relating to this strategy have also been used in producing the policies.

FUTURE WASTE MANAGEMENT CAPACITY REQUIREMENTS

7.21 The NRWDPD must plan for all waste streams and seek to move the management of all waste up the waste hierarchy. In order to establish the total amount of waste that Leeds must plan for in the period to 2021, figures for each waste stream have been compiled from detailed, locally specific work in the Background Waste Research Report and the Municipal Waste Site Requirements report. These are compared to the targets within the RSS which are intended as benchmarks for the preparation of Local Development Documents and are not detailed forecasts.

7.22 The future capacity required for each waste stream and the preferred policy position to achieve the type of facilities which will be needed are set out below. Sites are identified on Maps A1 and A2.

Municipal Solid Waste (MSW)

7.23 MSW is waste which is collected by the City Council. The majority of MSW is collected from households at the kerbside and includes other sources of waste, such as items deposited at Household Waste Sorting Sites (HWSS) and for example waste deposited in litter bins. Leeds is currently producing approximately 340,000 tonnes of MSW per annum and approximately 70% is sent to landfill.

7.24 The Waste Flow Model, developed by Leeds City Council to forecast future municipal waste arisings, is based on the latest tonnage data, housing and population growth estimates and social trends, and is continually being updated. This waste flow model is being used to inform the Council's future requirements for reuse, recycling, recovery and disposal capacity.

7.25 In terms of the future volumes of MSW, the RSS estimates a total of 424,000 tonnes of MSW will require management at 2021. This compares to estimates undertaken for the NRWDPD based on the waste flow model of 439,000 tonnes.

7.26 The RSS states that the recycling target is 55%, but the Regional Planning Body has confirmed that this is a misprint and that this should be the same as the WS2007 target of 50%. The RSS requires 212,000 tonnes of waste per annum to be recycled or composted which is similar to the NRWDPD figure of 210,000 tonnes based on the City Council's recycling target of 50%.

7.27 Of the waste which remains after recycling, the RSS figures are based on 25% continuing to be sent to landfill and 75% being treated. The Integrated Waste Strategy for Leeds 2005 to 2035 includes a target to 'recover value from 90% of municipal waste by 2020'. As part of its Waste Solution Programme, the Council is in the process of a letting a PFI contract for a Residual Waste Treatment Facility (RWTF) which would handle a throughput of approximately 163,000 tonnes of MSW and which is programmed to be operational by 2014. The RWTF will treat waste which cannot be recycled or composted and which would otherwise be sent to landfill. The RWTF will seek to turn this waste into a fuel, or a direct source of energy.

7.28 As shown by the table below, the net result is that the NRWDPD is planning for recycling capacity equivalent to the RSS figures, but would achieve a higher rate of residual treatment and less reliance on landfill than required by the RSS. It should be noted that the NRWDPD totals should not be taken as absolute as they are continually being revised as new data becomes available and the Waste Flow model on which they are based is continually being updated.

Comparison of Municipal Waste Requirements (000's Tonnes per Annum)

	Total Tonnes	Landfill	Residual Treatment	Recycling
RSS (2021)	424	106 (25%)	106* (25%)	212 (50%)
NRWDPD (2026)	439	43.5	163	210 (50% LCC target at 2020)

**The total RSS figure for treatment is given in Table 10.5 of the RSS as 318,000 tonnes but it is assumed this includes the recycling element of 50%. The figure in the table above has been readjusted to reflect this.*

7.29 The Municipal Waste Management Site Requirements Report and Site Selection Study Report (with update addendum) have established the type and range of facilities required to meet the MSW requirements for the period to 2026 (the RSS housing growth figures are to 2026 although waste requirements in the RSS are only given to 2021). It also establishes the capacities and is based on an update of the Waste Flow Model which takes into account a range of technical factors for each type of facility. It considers the typical operating capacities, characteristics and location requirements required for the different purposes of waste management facilities. These facilities are required in order that the Council can meet its recycling and landfill diversion targets.

7.30 Leeds City Council is undertaking a strategic review of Household Waste Sorting Sites and Bring Sites to determine which parts of the city are provided with convenient ways to recycle their household waste both now and in the future. This review will consider all aspects of the recycling network including site distribution, accessibility, operational constraints and the possible need for user restrictions. The study may conclude that new sites are required or where sites are under used, these will be closed and nearby sites improved.

7.31 To meet recycling and treatment targets, achieve self sufficiency, and to move waste up the waste hierarchy, the NRWDPD will need to plan for the following increases in MSW capacity in the City (based on 2026 projected tonnages):

Future MSW Capacity Requirement at 2026

Reuse, Recycling and Composting	➢ An increase in the existing capacity of Household Waste Sorting Sites (HWSS) to provide capacity equivalent to 90,000 tonnes of MSW per annum. The City Council is currently undertaking a review of HWSS and this will be completed by the end of December 2009. ➢ For Leeds to be self-sufficient in terms of green waste composting (as a large proportion of green waste is currently exported to facilities in adjoining authorities) additional capacity of 64,000 tonnes per annum to fully compost waste from gardens and other sources of green waste collected by the Council is required. This may be through one dedicated facility, or a number of smaller facilities up to three facilities. ➢ A new processing facility for organic streams of municipal waste, including surplus food waste, where this waste can be fully composted, or processed to produce a by-product used as a source of heat and/or power. This could be an Anaerobic Digestion or an In-Vessel Composting facility to treat 45,000 tonnes of MSW per annum. Dependent on different choices relating to how garden waste is managed, this facility may also process garden waste collected from the kerbside. ➢ Further additional recycling 'bring' facilities where the opportunity arises to add to the 435 sites which already exist in the City.
Transfer, Bulking and Processing	➢ A waste transfer and bulking facility where collected waste is stored for a short time before being transferred via larger vehicles to its final processing, treatment, or disposal destination. This would need to provide transfer and bulking capacity for 100,000 tonnes of MSW per annum. ➢ Materials Recovery Facilities to provide a capacity of 40,000 tonnes for MSW. These would sort recyclable waste collected from the kerbside for onward recycling. If this is not provided through existing or planned facilities, at least one new facility may be required (depending on whether a network of smaller facilities or a single larger facility is developed).
Residual Waste Treatment	➢ A new Residual Waste Treatment Facility to manage MSW generated within Leeds of approximately 163,000 tonnes.

Providing Self Sufficiency for MSW

7.32 In order to achieve self-sufficiency within the Leeds district for MSW, existing capacity will as far as is practicable be safeguarded for its continued use, this is dealt with later in policy waste 7. The Plan will allow for the expansion or refurbishment of existing facilities and for new additional facilities (based on the requirements identified above) to increase the overall capacity. As well as these current facilities a new strategic waste treatment facility incorporating energy recovery is needed and will be provided on one of the sites identified on Map E. This is covered in detail in policy waste 8.

Preferred Policy Position – Waste 2: Providing Self Sufficiency for MSW

REUSE, RECYCLING, COMPOSTING AND TRANSFER

Existing capacity will as far as is practicable be safeguarded for its continued use. The plan will allow for the expansion or refurbishment of existing facilities. The plan will allow for new additional facilities (based on the requirements identified above) to increase the overall capacity.

RESIDUAL WASTE TREATMENT

A new strategic facility to treat residual waste (incorporating energy recovery) is needed and will be provided on one of the sites identified on Map E.

Commercial and Industrial Waste

7.33 Commercial and Industrial Waste (C&I) waste is generated from premises which are used wholly for the purpose of a trade or a business, or for sport, recreation or entertainment. The City Council is not normally responsible for collecting this waste and businesses must make specific arrangements for its collection. This means that it is difficult to obtain accurate and up to date information for C&I waste which makes planning for its future requirements quite difficult.

7.34 The Background Waste Research Report has estimated that at 2002/2003, the total amount of C&I waste arising in Leeds was 975,364 tonnes. In the same year for the Yorkshire and Humber Region, approximately 31% of this waste was recycled, 14% was reused, 9% was treated, 34% was sent to landfill, 6% used in land recovery and the remaining amount either transferred or its final destination was not recorded. Although figures at the national level are not consistently monitored, the 2007/2008 progress report on the National Waste Strategy for England estimates that approximately 45% of C&I waste in England is recycled or reused.

7.35 By 2020/2021, both the RSS and NRWDPD estimate that 1.2 million tonnes per annum of C&I waste will need to be managed. The RSS assumes that 33% of this waste will be sent to landfill with 67% requiring treatment. On this basis, the RSS states that 411,000 tonnes of C&I waste would need to be sent to landfill and 834,000 tonnes sent for treatment. However, the RSS has not specified a specific target for the amount of C&I waste which should be recycled.

7.36 Projections for the NRWDPD have assumed that a proposed change to the European Union Waste Framework Directive to achieve a target of reuse and recycling of 70% of C&I waste by 2020 will eventually be transposed into UK legislation. As such, the NRWDPD forecasts that to achieve this recycling rate, 849,000 tonnes would need to be recycled and the remaining 364,000 tonnes would need to be disposed in landfill or treated in much the same way as MSW would need to be. It is not possible to estimate how much would be treated and how much would be sent to landfill as this is entirely dependent on commercial decisions and the waste management markets of operators.

Comparison of Commercial and Industrial Waste Requirements (000's Tonnes per Annum)

	Total Tonnes 2021	Landfill	Treatment	Recycling
RSS (2021)	1,245	411 (33%)	834 (67%)	
NRWDPD (2020)	1,212	364 (30%)		849 (70%)

* Note is has not been possible to forecast C&I beyond 2020.

7.37 Although the collection of C&I waste falls in most circumstances outside the control of the Council, new commercial waste facilities and more efficient waste management still needs to be planned for in the NRWDPD. Many aspects of the commercial waste stream can be recycled and reused, following processes similar to the MSW waste stream. Food waste, motor retail, chemicals manufacture and service industries account for almost 60% of the total C&I waste stream.

7.38 It is difficult to establish with great certainty where C&I waste is eventually processed for recycling. It is estimated by the Safeguarding Waste Management Sites Report that there are approximately 100 companies operating in this market in Leeds and that around a third of these operators have their own sites where waste is stored and may be sorted for either reuse or onward processing. Skip operators vary in size with some estimated to be processing up to 200,000 tonnes of waste per annum and others as little as 3,000 tonnes. There are also a range of scrap yards for motor vehicles and other scrap metal.

7.39 Some composting capacity for organic waste exists in Leeds including an unimplemented temporary permission at Newsam Green.

7.40 In order to sort collected C&I waste for onward recycling, Materials Recycling Facilities (MRF) are required. Although the process is similar to municipal waste, different approaches and technologies are normally required to deal with the more industrial and 'heavy' types of waste that are generated. The technological choices dictate the quality of the recyclate and hence the market, so these facilities are critical if the recycling and reuse rate is to be increased to 70%. At present, there is one MRF in Leeds with a capacity of approximately 60,000 tonnes and there are two extant planning permissions within the City, the most notable at Gelderd Road which if implemented would have a capacity of 200,000 tonnes.

7.41 Where C&I waste cannot be reused or recycled, additional waste treatment capacity is required.

7.42 Taking the above into account and the general difficulty in planning for C&I waste, the policy position for achieving self-sufficiency for managing C&I waste in Leeds is set out below.

Preferred Policy Position – Waste 3: Achieving Self Sufficiency for C&I Waste

REUSE, RECYCLING, COMPOSTING AND TRANSFER

Existing capacity will as far as is practicable be safeguarded for its continued use and these sites are shown on Maps C. The Plan will allow for the expansion or refurbishment of existing facilities and new additional facilities which contribute towards increasing the overall capacity.

TREATMENT

Additional treatment capacity and/or new facilities will be required during the plan period to deal with C&I waste which cannot be dealt with higher up the waste hierarchy. Maps E and F show potential sites where treatment of these wastes could take place.

Construction, Demolition and Excavation Waste (CD&E)

7.43 C&DE waste is generally inert (i.e. it contains no hazardous material) and arises from the construction, maintenance or demolition of buildings or other engineering projects. Information on C&DE arisings has only been obtained at the West Yorkshire level. The Background Waste Research report suggests that in West Yorkshire (2005) recycling accounted for around 59% of this waste stream, 35% was disposed at landfill, and 6% used in restoration or other engineering projects.

7.44 The Government objective is to halve the amount of this type of waste sent to landfill by 2012 and proposed revisions to the Waste Framework Directive set out targets to reuse 70% of CD&E waste by 2020. For Leeds to meet this target, the Background Waste Research Report forecasts that the following arisings will need to be managed:

C&DE Future Waste Arisings

Facility	Estimated Processing Capacity required at 2019 / 2020 (tonnes)
Recycle / reuse	1,089,000
Landfill / treatment	467,000

7.45 Recent legislation introducing mandatory Site Waste Management Plans for construction projects over £300,000 in value represents a positive step towards both reducing the amount of waste generated at construction sites and to further improve the amount which is recycled rather than sent to landfill. The Waste and Resources Action Programme (WRAP) and Business Resource Efficiency and Waste Programme (BREW) are doing a lot of work to encourage the recycling of construction waste.

7.46 In general, excavated materials such as clay and shale will still need to be landfilled, but most other material can be reused or recycled. Many construction operators have developed their own sites to

store, process and recycle construction waste as it makes them more competitive than if they were paying landfill tax for its disposal. These sites are known as Aggregate Recycling Sites. There are 8 active recycled aggregates sites, two closed and two permitted but not yet developed and one of the active sites will not be safeguarded. It is known that some operators are struggling to retain existing operations within the boundaries of their current sites and some sites may be lost due to redevelopment proposals. At least one operator is seeking a new site. There may be more opportunity in the City to reuse material directly without it needing to be crushed, for example recovered stones and bricks.

7.47 Overall, CD&E waste represents the greatest proportion of the overall waste stream for Leeds and the recycling rate currently being achieved is probably far greater than that which is currently being achieved for other waste streams. There is still an opportunity to increase this further to meet the draft European Union target of 70%. The preferred approach in the NRWDPD is set out below.

Preferred Policy Position – Waste 4: Providing Self Sufficiency for C&DE Waste

REUSE, RECYCLING, COMPOSTING AND TRANSFER

Existing capacity will as far as is practicable be safeguarded for its continued use. Maps C provide details of potential locations for these facilities. The Plan will allow for the expansion or refurbishment of existing facilities and new additional facilities to increase the overall capacity.

The NRWDPD will strongly encourage the reuse of inert waste in restoration and construction projects. Existing saved policies WM3, WM4 and WM14 of the UDP will be carried forward to support this objective.

TREATMENT

Additional treatment capacity and/or new facilities will be required during the plan period to deal with C&DE waste which cannot be dealt with higher up the waste hierarchy. Locations of these facilities can be found on Maps E and F.

Agricultural Waste

7.48 Agricultural waste mainly comprises manure and slurry. Most of this waste is dealt with on an individual basis and it is not proposed to provide a specific policy relating to this.

Mining and Quarry Waste

7.49 For economic reasons, most of this type of waste is dealt with at source and where possible is sold or stored for later use. As most of this waste is non-hazardous or inert, it is often used to backfill voids or for other land stabilisation works. The policy position is contained within the Minerals section of the NRWDPD.

Hazardous Waste

7.50 Information obtained from the Environment Agency's hazardous waste interrogator shows that at 2004, Leeds produced 92,794 tonnes of hazardous waste. The majority of this waste is treated (44%) or landfilled (26%), with 9% incinerated or recycled. Leeds is a net importer of hazardous waste, with a total of 50,000 tonnes exported and 130,000 tonnes imported meaning the City processes more hazardous waste than it produces. This reflects the general trend for the Yorkshire and Humber Region as a whole which is a net importer of hazardous waste.

7.51 There is a limited amount of hazardous waste landfill capacity at Skelton Landfill and an effluent treatment plant and a clinical waste incinerator at Knostrop.

7.52 The Background Waste Report estimates that at 2020 the City will generate an increase in this waste stream to approximately 106,000 tonnes per annum. This is less than the current capacity available given that Leeds is currently importing around 130,000 tonnes of Hazardous Waste.

Hazardous Waste Future Waste Arisings

Facility	Estimated Processing Capacity required at 2019 / 2020 (tonnes)
Incineration	9,000
Landfill	27,000 to 28,000
Recycle / reuse	9,000 to 10,000
Transfer	13,000
Treatment	46,000 to 48,000

7.53 There are no specific targets set for this waste stream given its specialist nature although in recent years more sophisticated technology means it is possible to reuse contaminated soils in restoration sites rather than having to send them to hazardous waste landfill or off-site treatment.

7.54 Overall it is considered that with the exception of landfill provision, the City appears to already have more hazardous waste capacity than it requires. Clinical waste is incinerated and liquid hazardous waste is dealt with at the Knostrop Effluent Treatment Plant. As such, the policy of the NRWDPD is to encourage more in-situ recycling of hazardous waste material generated.

Preferred Policy Position – Waste 5: Hazardous Waste

Existing capacity will as far as is practicable be safeguarded for its continued use. The plan will favour the expansion, refurbishment or replacement of existing facilities at existing locations in preference to new facilities. All proposals for hazardous waste should demonstrate the need for such facilities and how they support the objectives of the waste hierarchy.

The on site treatment of contaminated soils will be supported and the hierarchy in policy ENV 14(G) of the RSS will be applied.

Sewage Sludge

7.55 Based on information from Yorkshire Water in 2005, approximately 22,510 tonnes of sewage sludge is produced in Leeds. The majority is reused or incinerated with energy recovery at the Knostrop sewage sludge incinerator with only a fractional amount sent to landfill. There will be further growth in sewage sludge to 25,000 tonnes as a result of population increases during the plan period.

Sewage Sludge Future Waste Arisings

Facility	Estimated Processing Capacity required at 2019 / 2020 (tonnes)
Recycle / reuse	13,000
Landfill	1,000
Incineration	11,000

Capacity requirements have been rounded to the nearest 1,000 tonnes.
The recycle / reuse capacity includes transfer to markets, i.e. may not require infrastructure other than perhaps transfer facilities.

7.56 Similar to hazardous waste, the City has capacity to process more sewage sludge than it produces although there may be opportunities in the long term to move from incineration to more reuse and recovery particularly within the Knostrop STW. The preferred option is to maintain the existing capacity and where possible move its disposal up the waste hierarchy.

Preferred Policy Position – Waste 6: Sewage Sludge

Support proposals that move the treatment of sewage sludge up the waste hierarchy. Proposals would need to demonstrate how they meet the criteria in Annex E of PPS 10 and provide mitigation where appropriate.

PROVIDING LAND TO ACHIEVE FUTURE SELF SUFFICIENCY

7.57 To meet the future waste management needs of the City for each waste stream and to meet the waste hierarchy, existing waste management capacity will need to be maintained and expanded where appropriate and new facilities will need to be planned for. New facilities will require space.

7.58 It is difficult to match waste management needs with land supply. Other than for MSW, it difficult to define with any accuracy what form (and what capacity) future proposals for waste management uses will be. For example, a small number of facilities with larger capacities may come forward or a greater number of facilities with smaller throughputs may do so. The capacity of waste management facilities does not necessarily correlate directly to the land area required as a single facility may require less land than two smaller facilities which provide an equal capacity.

7.59 The Issues and Options Report considered whether new waste management facilities should be concentrated within certain areas of the City, or if a network of sites and locations should be planned for. Given that a significant shift is needed to achieve the objectives of the NRWDPD and to meet the capacity requirements, a flexible approach is required which is not overly restrictive and which enables

the most sustainable and appropriate locations to come forward. This will include identifying specific sites within the NRWDPD, but also providing policies for proposals which may come forward on other sites which have not yet been identified. This also allows for the uncertainty described in the paragraphs above.

7.60 Following consultation on the Issues and Options and as a result of further evidence gathering, the preferred spatial approach is to provide a flexible spatial approach which enables a network of facilities to be developed in the most suitable locations across the City. The overall approach to planning for new waste management facilities will be:

- Provide a spatial policy to identify where it is appropriate to safeguard existing waste management sites for their continued use and possible expansion.

- Identify strategic sites where the principle of major waste treatment facilities and/or the co-location of treatment with other waste management facilities is deemed to be appropriate.

- Accept that some waste management processes (although not all) are similar to B2 industrial processes and provide a policy to set out the types of waste management facilities which in principle may be acceptable within the existing industrial areas.

- Use a set of criteria to assess proposals for waste management which come forward outside the areas specified above. These criteria will use Annex E of PPS 10, the locational Policy ENV 14 of the RSS, and be supplemented by NRWDPD policies which reflect the locally specific issues and circumstances.

7.61 This approach is expanded and a policy position stated in the following sections.

Safeguarding Existing Waste Management Sites

7.62 Existing waste management capacity needs to be safeguarded to provide certainty about facilities into the future. A detailed review of existing waste management sites within Leeds has been undertaken to identify if their continued use (as waste management facilities) remains appropriate and identify where there may be the opportunity for them to be expanded or redeveloped, either for the same or a different waste use.

7.63 Responses around issue 7 in the Issues and Alternative Options Report, 'Safeguarding Waste Sites' favoured option 2 to 'protect' the status of existing sites as waste management sites. Although the safeguarding policy is a principle of the NRWDPD, it is recognised there may be some circumstances whereby alternative uses are acceptable and that safeguarding sites without exception may bring the plan into conflict with other objectives of the LDF. The allocation of waste management sites will also be subject to a review periodically.

7.64 The preferred position is to include a policy safeguarding existing sites.

Preferred Policy Position – Waste 7: Safeguarded Existing Waste Management Sites

- **To use the plans supporting this document (Maps C1, C2, C3, C4 and C5) as the basis to safeguard existing waste management sites for their continued use and potential expansion (see supporting volume of figures and plans).**
- **To include a policy which safeguards as far as possible the existing waste management uses on these sites, but recognise that there may be some circumstances whereby they are re-developed for alternative uses.**
- **Proposals would need to demonstrate how they meet the criteria in Annex E of PPS 10 and provide mitigation where appropriate.**

To include a policy which states the following: Applications for the change of use of a safeguarded waste site must demonstrate that there is no longer a need for the site for waste purposes either to serve the needs of the City or adjoining local authority areas or there is an overriding need for the proposed development.

Planning for Waste Treatment and Recovery

7.65 By recognising that waste can be considered in resource flow terms, the NRWDPD seeks to both reduce natural resource consumption and ensure as much waste as possible is reused and recycled. Where waste cannot be reused, recycled or organically treated (often referred to as 'residual waste'), treatment is necessary. This is particularly relevant to C&I and MSW waste. Waste recovery and treatment facilities are the mechanisms whereby waste which cannot be recycled or composted is either treated and turned into a fuel, or is turned directly into heat or power.

7.66 The IWS supported by the waste modelling, identified that Leeds will require facilities for residual waste treatment to process approximately 163,000 tonnes of waste per annum. A significant amount of work has already been undertaken by the Council to progress a RWTF and a procurement is in progress to deliver this facility by 2014.

7.67 Co-location of different waste management (treatment, organic waste treatment, recycling and recovery) facilities can reduce the emission of greenhouse gases associated with transportation and enable more efficient operations. This is supported by PPS10 and the RSS. Many of the consultation responses recognised that co-location can reduce the impacts of waste management by reducing transportation.

7.68 The co-location of new facilities will mean trying to facilitate an integrated approach to the entire waste stream. Achieving this is quite difficult as the mechanisms for delivering new facilities will be different dependent on the origin of the waste and market conditions. Commercial operators will react to the market for new commercial waste facilities as landfill capacity reduces and becomes more expensive over time.

7.69 The Municipal Site Assessment Report has looked at whether it is appropriate to co-locate all types of waste management uses or whether this could provide cumulative or specific impacts. Although most types of waste management uses could be co-located, uses such as composting may be more problematic and would need to meet a number of specific requirements to avoid potential impacts.

7.70 Despite such uncertainties, the NRWDPD should maintain flexibility by identifying a range of locations and site sizes sufficient to support different types of waste treatment technologies and the co-location of different waste management facilities. Such sites are identified in the Site Selection Study and its Addendum.

7.71 All of the potential sites are identified in the east of the City within the Aire Valley as this area meets the site selection criteria set out in PPS10 and the RSS. The characteristics of the Aire Valley in terms of its industrial past, predominant industrial use, good transportation links, availability of sites which have the potential to be delivered and the potential to plan for waste management as part of the overall regeneration of the area make this the main opportunity for the location of major waste facilities.

7.72 Within the Aire Valley, the following four sites have been identified as potentially suitable for major strategic waste management facilities. (These are shown on Map E in the Mapbook).

Potentially Suitable Waste Management Sites within the Aire Valley

Site	Comment
Strategic Site 1 - Former Skelton Grange Power Station	➢ It is previously developed land within an existing industrial area. ➢ The site was previously used for power generation and is owned by a major power generating company. ➢ The site selection process has determined that the site is deliverable in terms of site ownership and the likelihood or obtaining planning permission. ➢ It is well located strategically to serve the whole city. ➢ The main issues are access via Skelton Grange Bridge and compatibility with the proposed new neighbourhood area as part of the regeneration proposals for the Aire Valley. However, it is considered that both these issues can be overcome. ➢ It is within a low flood risk area.
Strategic Site 2 - Development site adjacent to Knostrop Waste Water Treatment Works, South of Pontefract Lane	➢ It is previously developed land within an existing industrial area. ➢ It is well located strategically to serve the whole city. ➢ There is potential synergy with the surrounding land uses and the land is owned by a major utility provider. The site owner has confirmed that they wish the site to be considered for waste related uses. ➢ It has direct access to the East Leeds Link Road. ➢ It is within a low flood risk area. ➢ The main issue is whether the frontage to the East Leeds Link Road makes this a less suitable site and if it may be more appropriate to retain for other potential uses.

Site	Comment
Strategic Site 3 - Vacant land areas within Knostrop Waste Water Treatment Works (Aire Valley)	➢ The site owner has confirmed that the land is available for the development of waste uses. ➢ It is previously developed land within an area currently used for Sewage Waste Water Treatment which is currently subject to significant enhancement to allow the redevelopment of existing land. The area available for development has been identified as two existing sewage filter beds and humus tanks but the site owner has also requested that a much wider area of vacant land is also maintained for possible waste uses. ➢ The site selection process has determined that the site is deliverable in terms of land ownership and it meets key planning tests. ➢ It is well located strategically to serve the whole city. ➢ There is potential synergy with the surrounding land uses and the land is owned by a major utility provider. ➢ It has direct access to the East Leeds Link Road. ➢ It is within a low flood risk area.
Strategic Site 4 - Former Wholesale Market between Newmarket Approach and Newmarket Lane	➢ It is previously developed land within an existing industrial area. ➢ The site selection process has determined that the site is deliverable as it is owned by the City Council and it meets key planning tests. ➢ It is well located strategically to serve the whole city. ➢ It has direct access to the East Leeds Link Road. ➢ It is within a low flood risk area. ➢ The main issue is that there is an existing residential area located close to the north east boundary of the site although the part of the site closest to the East Leeds Link Road is over 450m away from these properties.

7.73 The preferred policy position of the NRWDPD is to identify all four of these sites as suitable strategic waste sites in order to allow for future flexibility and to provide contingency in long term planning. The Site Selection Study Report explains in detail how strategic waste uses have been defined. They are shown on Map E in the supporting Mapbook. In parallel, with the preparation of the NR&WDPD, an Area Action Plan for Aire Valley Leeds (AVL) is also being developed. This in turn provides a detailed basis for area based planning, in managing opportunities for major regeneration and development, consistent with the longer term aspirations for AVL and the principles of sustainable development.

Preferred Policy Position – Waste 8: Strategic Sites for Waste Treatment

➢ **The sites outlined on Map E will be identified as strategic sites for major waste treatment facilities and as being suitable for other waste management uses as appropriate. Proposals would need to demonstrate how they meet the criteria in Annex E of PPS10 and provide mitigation where appropriate.**

Acceptable Waste Uses in Industrial Areas

7.74 Waste Management Uses have historically been established in industrial areas and Saved Policy WM5 of the UDP already states that waste management uses will be treated as industrial uses for the purposes of planning policy. PPS10 and Policy ENV14(E) of the RSS also state that existing industrial areas should be the priority for new waste management uses.

7.75 The preferred approach in the NRWDPD is to reflect the National and Regional Guidance and Saved Policy WM5 of the UDP. Leeds has identified a number of existing industrial areas which have the potential for resource and recycling activities. Resource and recycling means waste and mineral activities (except mineral extraction and landfilling) including waste collection, sorting and transfer.

7.76 The sites already have some minerals and waste uses taking place or other related uses such as open storage and waste transport depots. The purpose in allocating them is to try to concentrate these activities in a locality, so that their impact can be better managed in appropriate location and to ensure that Leeds has sufficient sites for waste or minerals purposes.

7.77 The Municipal Waste Management Site Requirements Report has looked at the specific location requirements of different types of waste management facilities. This has shown that most types of waste uses would be suitable within existing industrial areas particularly where they are fully enclosed within a building.

Preferred Policy Position – Waste 9: Waste Uses Within Existing Industrial Areas

Existing industrial areas will be treated as locations where the principle of the following waste uses is accepted:

- **Waste Recycling, Transfer, Bulking, Sorting and Processing Facilities: for example Materials Recovery Facilities, Waste Transfer and Bulking Stations, Household Waste Sorting Sites, smaller scale energy recovery and industrial operations relating to reuse and recycling. Such facilities should be fully enclosed as far as is practicable. The principle of re-using existing buildings for such uses is accepted but planning permission will need to be obtained.**
- **Organic treatment and composting, if it can be demonstrated that they would not give rise to unacceptable impacts on the surrounding area.**
- **Proposals within these areas would need to demonstrate that they meet the criteria provided in Annex E of PPS10 and provide mitigation where appropriate.**
- **Broad areas of search which are existing industrial areas are indicated on Maps F. These areas are known as 'Sites with potential for Resource and Recycling'. However, proposals in other areas will also be considered provided that it can be demonstrated that they are industrial in nature and that all the other tests set out in this policy are met.**

Future Waste Use Proposals

7.78 Although waste management proposals will be favoured in the locations identified above, there will be circumstances whereby proposals come forward at other locations. For example, this may be on a specific site where waste is generated or because there are operational factors which make a particular site appropriate for the proposed waste management use.

7.79 Feedback on Issue 4 in the Issues and Alternative Options Report, 'Other Location Considerations' preferred Option 2 to allow local circumstances to be reflected when applying National Policy. Option 1 is rejected as this would not allow local flexibility and may be to the detriment of sustainable development.

7.80 The preferred approach in the NRWDPD is to incorporate the existing and National and Regional Guidance and appropriate saved policies of the UDP.

Preferred Policy Position – Waste 10: Future Waste Use Proposals

The NRWDPD will facilitate a network of sites across the Leeds area including: recycling; organic waste treatment; sorting; transfer; crushing and processing operations. This includes provision for the delivery of local schemes, including those proposed by community groups or local businesses, for example, local recycling or organic waste treatment facilities within key community facilities or business centres.

The policy will include criteria to safeguard local amenity and environmental issues including:

- **Proposals should demonstrate why safeguarded and industrial sites are not appropriate or suitable and whether they meet the priority orders and tests set out in Policy ENV14(E) of the RSS.**
- **For composting proposals, UDP saved policy WM7 will be carried forward. This will allow for such uses within the Green Belt and Rural Land, if exceptional circumstances as identified in PPS2 can be demonstrated and the other tests in this policy are demonstrated.**
- **Proposals would need to demonstrate that they meet the criteria provided in Annex E of PPS10 and provide mitigation where appropriate.**
- **UDP saved policies WM8, WM9, WM10 and WM11 will be carried forward to provide locally specific development control policies.**

7.81 The approach to safeguarding and identifying sites for new waste management facilities as set out above will result in the following numbers of sites:

Sites Identified for Future Waste Management Uses

Site Source	No of Sites	Preferred Uses
Safeguarded Sites for Continued Waste Management Use	140	As identified in the Safeguarded Site Assessment Schedule and shown on Map A and Maps C.
Sites Identified within Industrial areas	5	All types of waste uses (and some mineral uses) except major waste treatment. Composting, organic treatment, resource and recycling facilities will be suitable provided it can be demonstrated they would not give rise to amenity impacts. Shown on Map F.
Strategic Sites	4	Major Waste Treatment Facilities and Co-location. Shown on Map E.

PLANNING FOR WASTE DISPOSAL

7.82 The focus of the NRWDPD is to move waste up the waste hierarchy. Most consultation responses to the Issues and Options were not in favour of extending landfill provision and the aspiration for Leeds in the IWS is for a 'Zero Waste' City. However, even with greatly improved reuse, recycling, organic waste treatment and recovery, it will still be necessary to dispose of some waste by landfill particularly that remaining from other processes.

7.83 The RSS states that at 2005 there was sufficient landfill capacity in West Yorkshire for only 9 years and RSS Policy ENV13 includes the statement that "In the short term there is generally adequate landfill capacity, but there may be a need for new capacity to replace existing facilities, particularly in West Yorkshire." The RSS also encourages waste planning authorities to liaise with each other in order to make the best use of existing and new waste assets, so that excess capacity of some management facilities in an area can be used to offset shortages in neighbouring authorities, especially if reciprocal arrangements can be agreed.

7.84 Leeds currently has two landfill sites at Skelton and Peckfield which are likely to operate until 2017 and 2022 respectively. These accept MSW, C&I and other inert waste, with Skelton accepting a limited amount of Hazardous Waste. There is a landfill/landform site at Calverley currently accepting inert waste to a total capacity of 1 million m^3. There is also an unimplemented permission to deposit 38,000 m^3 of inert wastes in a railway cutting at Carlisle Road, Pudsey.

7.85 The Council will liaise with its neighbours and, as a contingency, there may be a need for some additional, short-term landfill capacity in the City. This could be provided through the quarry complex at Howley Park Quarries which has permission for landfilling subject to agreement of phasing. Some if not all these active quarries can be made acceptable for MSW/C&I wastes, as per previous landfilling. The first phase could be available prior to closure of Skelton. The estimated capacity is 6 million m^3.

7.86 There are several other quarries which have the potential to accept inert wastes particularly from C&DE. These are Brittania Quarry which has a capacity of 2 million m^3 with disposal expected to commence in 2012. Blackhill, Arthington, Methley, Swillington and Moor Top quarries also have the potential to accept inert wastes.

7.87 Responses to Issue 5 in the Issues and Options Report 'Landfill Provision', preferred option 1, providing extensions to existing landfill sites if possible. The presence of former mineral quarries means option 2, providing additional landfill sites, is rejected. The Council does not consider that it should rely on landfill provision outside the City and rejects option 3.

7.88 There is a small amount of hazardous waste landfill provision within Leeds, but the Background Waste Research Report shows that only a small quantity of hazardous waste is required to be landfilled in Leeds. The Council is unlikely to oppose the creation of cells to accept hazardous waste within the landfill sites if operators wished to do this.

Preferred Policy Position – Waste 11: Landfill Disposal

The Council has a presumption against new landfill provision within the LCC area. The council will be reviewing existing landfill restoration projects in order to use a reduced amount of landfill material.

Where there is a proven need for landfill provision this will be met by existing or former quarry sites as shown by Maps C4 and C5. Any Hazardous Waste provision should take place within active landfill sites.

Existing saved UDP policies WM13-WM18 which provide detailed local policies for landfill disposal will be carried forward.

Liaison with neighbouring Councils to see how existing and new waste management facilities can be best used to provide for the West Yorkshire sub-region's needs.

SUPPORTING FIGURES AND PLANS

7.89 This section of the NRWDPD is supported by plans as follows:

- Figure 2 : Existing waste sites (historic information)
- Map A: Overview of all Waste and Mineral Management Sites
- Maps C: Waste Sites Safeguarded
- Maps D: Waste Sites Not Safeguarded
- Maps E: The Strategic Waste Management Sites
- Maps F: Industrial Estates for Resource and Recycling Uses (Proposed).

SAVED POLICIES

7.90 The table below sets out the saved UDP policies which are relevant to this section of the NRWDPD.

Relevant Waste UDP Saved Policies

UDP Policy No	Summary of Content	Comment
WM1	Sustainable Waste Management Facilities.	This policy will be removed as it refers to outdated tests which have been removed from National Planning Guidance such as BPEO.
WM2	Waste hierarchy of reduction, reuse, recovery and disposal.	This policy will be removed as it repeats guidance in PPS 10 and its overall purpose is reflected in the NRWDPD.
WM3	Reduction and Reuse of Waste.	This policy supports the reduction and reuse of waste in construction. It supports the objectives of the NRWDPD and does not repeat national or regional guidance. It is proposed to retain this policy.
WM4	Recovery of Waste.	This policy supports the recovery of waste in construction. It supports the objectives of the NRWDPD and does not repeat national or regional guidance. It is proposed to retain this policy.
WM5	Waste Management Facilities: Permanent Uses.	This policy supports the location priorities in PPS 10, the RSS and NRWDPD as it clearly states that waste management uses will be treated as an industrial use of land. It will be retained and supplemented by an additional policy in the NRWDPD.
WM6	Waste Management Facilities: Proximity of Other Waste and Minerals Extraction of Operations.	It is considered that this policy is superseded by PPS 10 and the NRWDPD. It is proposed to delete this policy.
WM7	Waste Management Facilities: Composting of Green Waste.	This policy supports composting and recognises that there may be circumstances where this activity may take place in the Green Belt or rural land. It is considered that the retention of this policy is supported by evidence presented as part of the Municipal Waste Site Requirements report. It is proposed to retain this policy.
WM8	Waste Management Facilities: Potential Issues and Impacts.	It is considered that this policy repeats most of the guidance in Annex E of PPS 10. It is proposed to delete this policy.
WM9	Waste Management Facilities: Site Entrances.	This is a locally specific development control policy. It is proposed to retain in its current form.
WM10	Waste Management Facilities: Recycling and the Transferring of Waste.	This is a locally specific development control policy. It is proposed to retain in its current form.
WM11	Waste Management Facilities: Storage in Open Areas	This is a locally specific development control policy. It is proposed to retain in its current form.
WM13	Waste Disposal Sites.	This is a locally specific development control policy. It is proposed to retain in its current form.

UDP Policy No	Summary of Content	Comment
WM14	Waste Disposal: Landraising by Deposit of Waste Materials	This is a locally specific development control policy. It is proposed to retain in its current form.
WM15	Waste Disposal: Areas of Nature Conservation	This is a locally specific development control policy. It is proposed to retain in its current form.
WM16	Waste Disposal: Final Gradients at Landfill Sites	This is a locally specific development control policy. It is proposed to retain in its current form.
WM17	Waste Disposal: Landfill and Landraising of Sites	This is a locally specific development control policy. It is proposed to retain in its current form.
WM18	Waste Disposal Gas Emissions and Control Measures	This is a locally specific development control policy. It is proposed to retain in its current form.

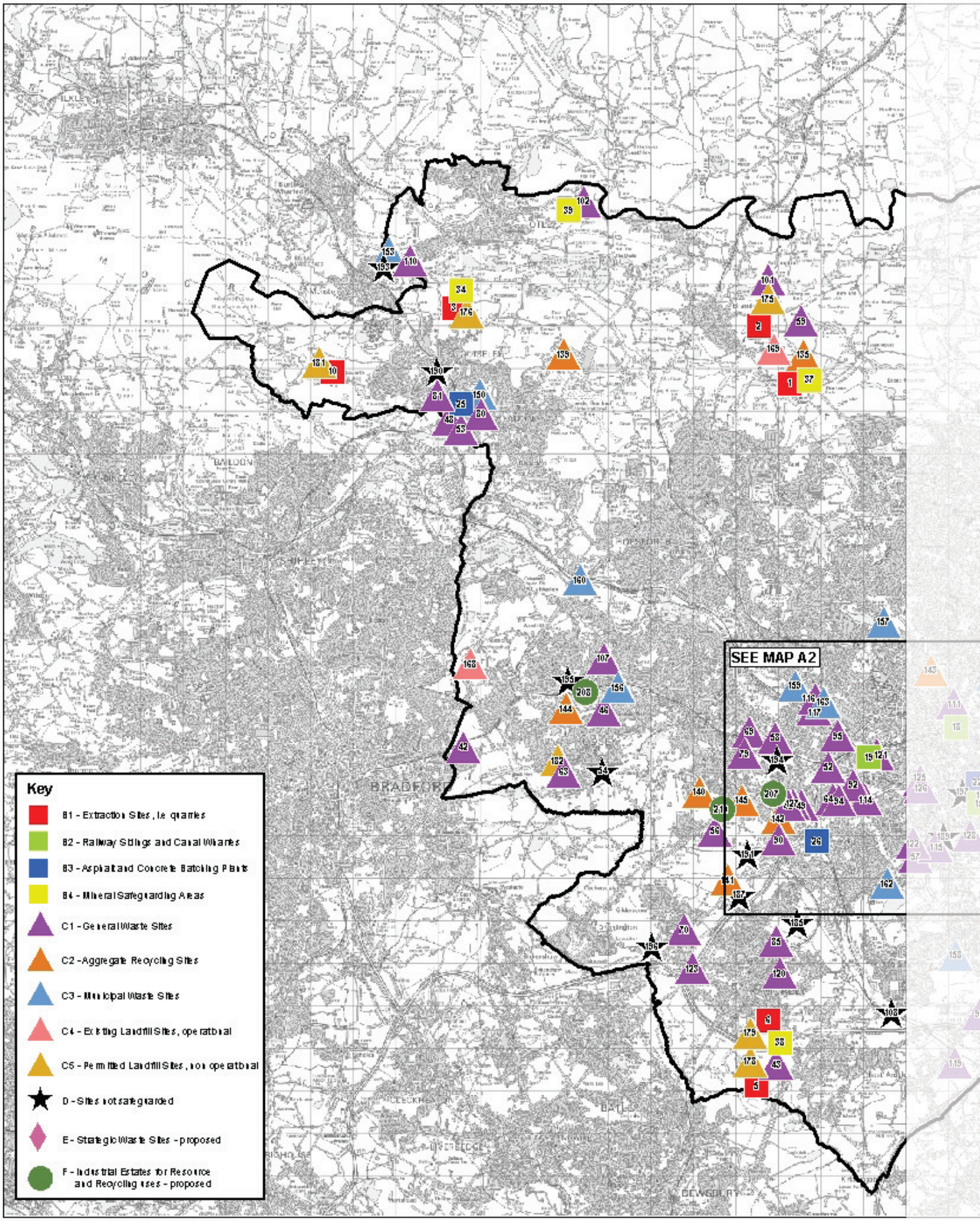
We would like your comments on any of the above policy positions. Please use the policy reference in your response.

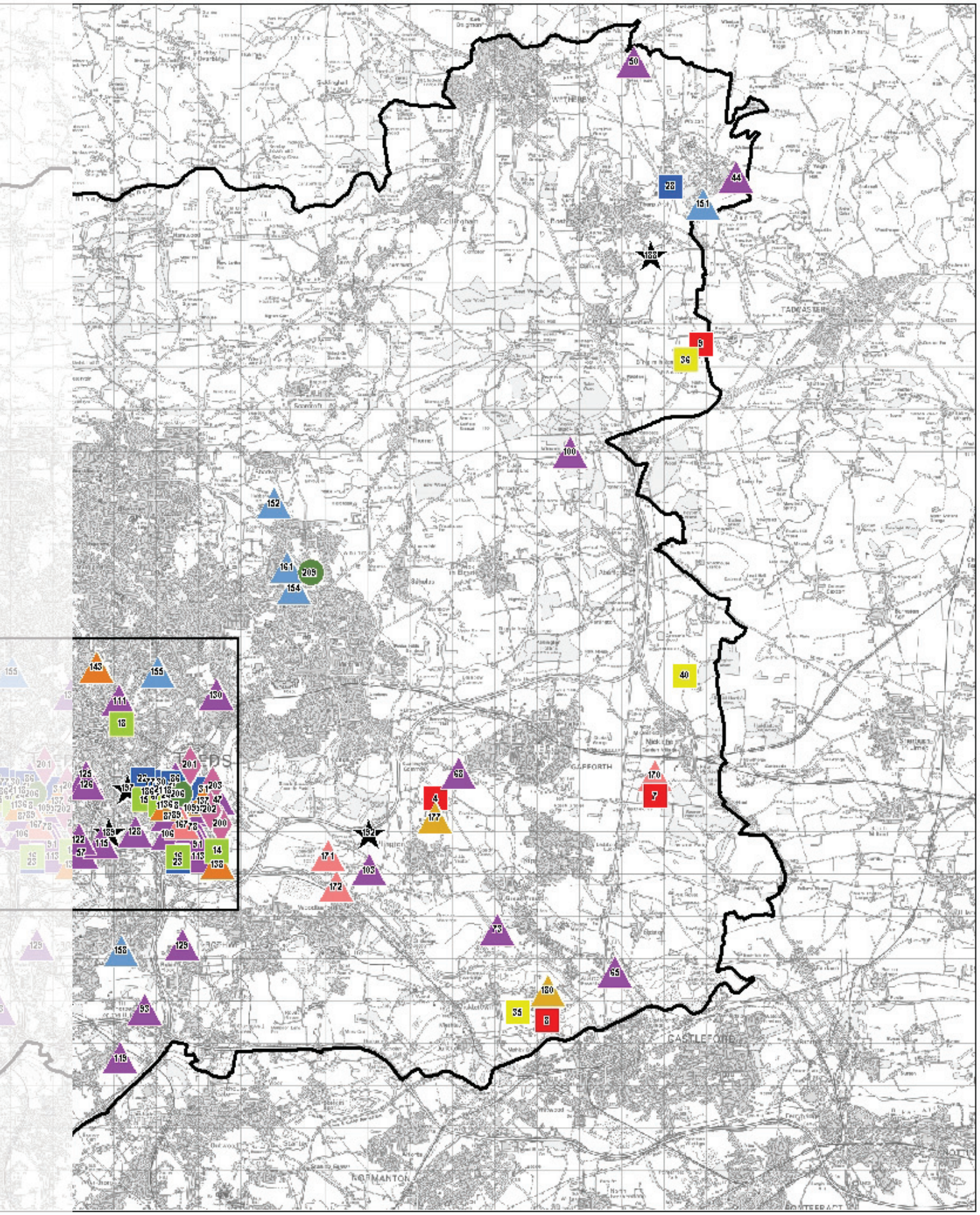
8 CONCLUSION

8.1 The Council will be pleased to obtain as many responses as possible to its Policy Position for the NRWDPD and details are set out in the Introduction and on the inside front cover as to how you can make your view known. After all responses have been received and analysed, the Council will consider them, update its evidence base, review its proposals and undertake a further six week period of consultation prior to submitting the Plan to Government and the Planning Inspectorate. At the moment, it is intended to submit the Plan in Spring 2011.

8.2 The submitted Plan will contain an implementation framework to show who will be responsible for delivering which aspects of the Plan and when and how they are to be delivered. To assist this process, the Plan will also contain targets for each policy so that progress can be monitored.

Map A1: Overview of all mineral and waste sites





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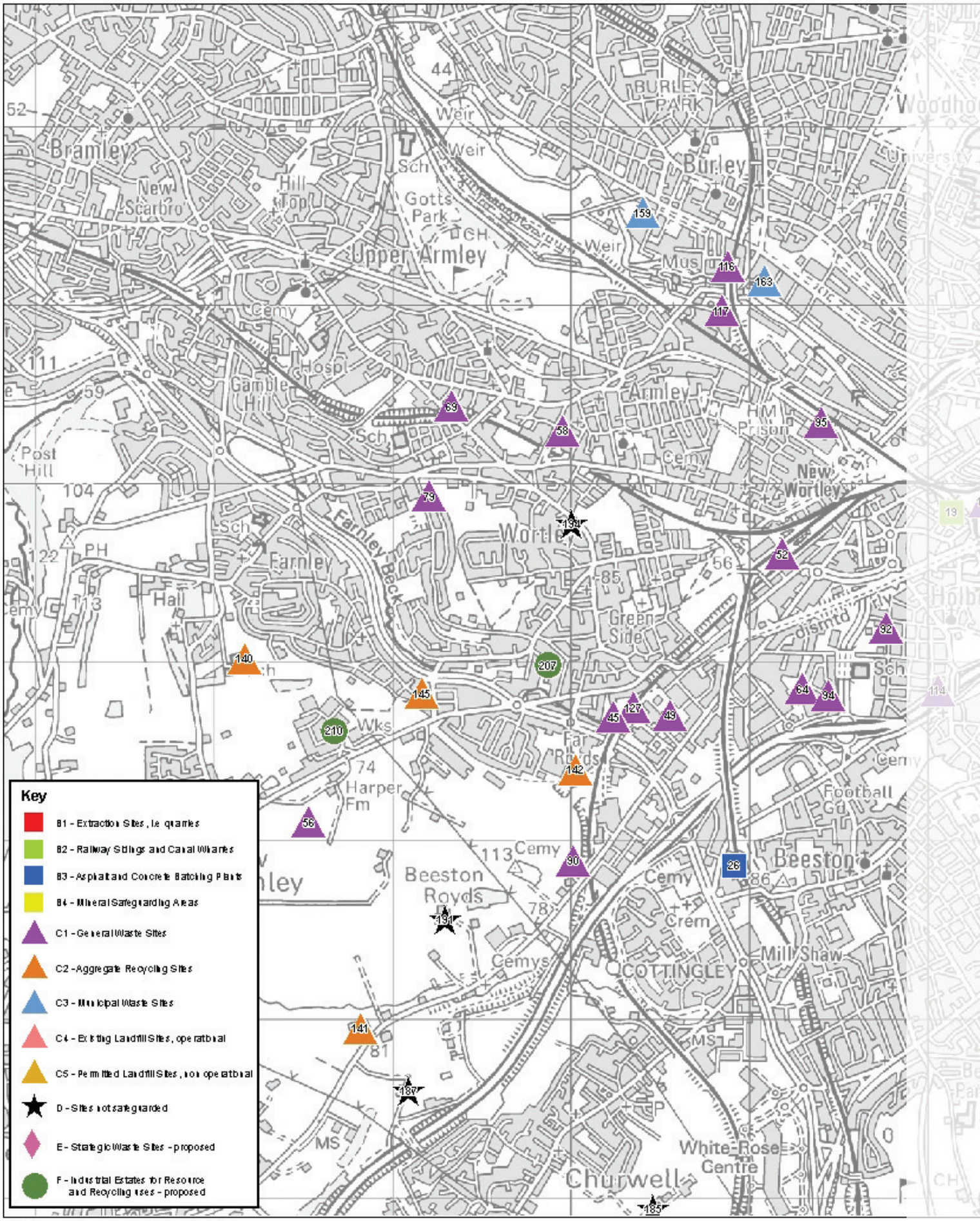
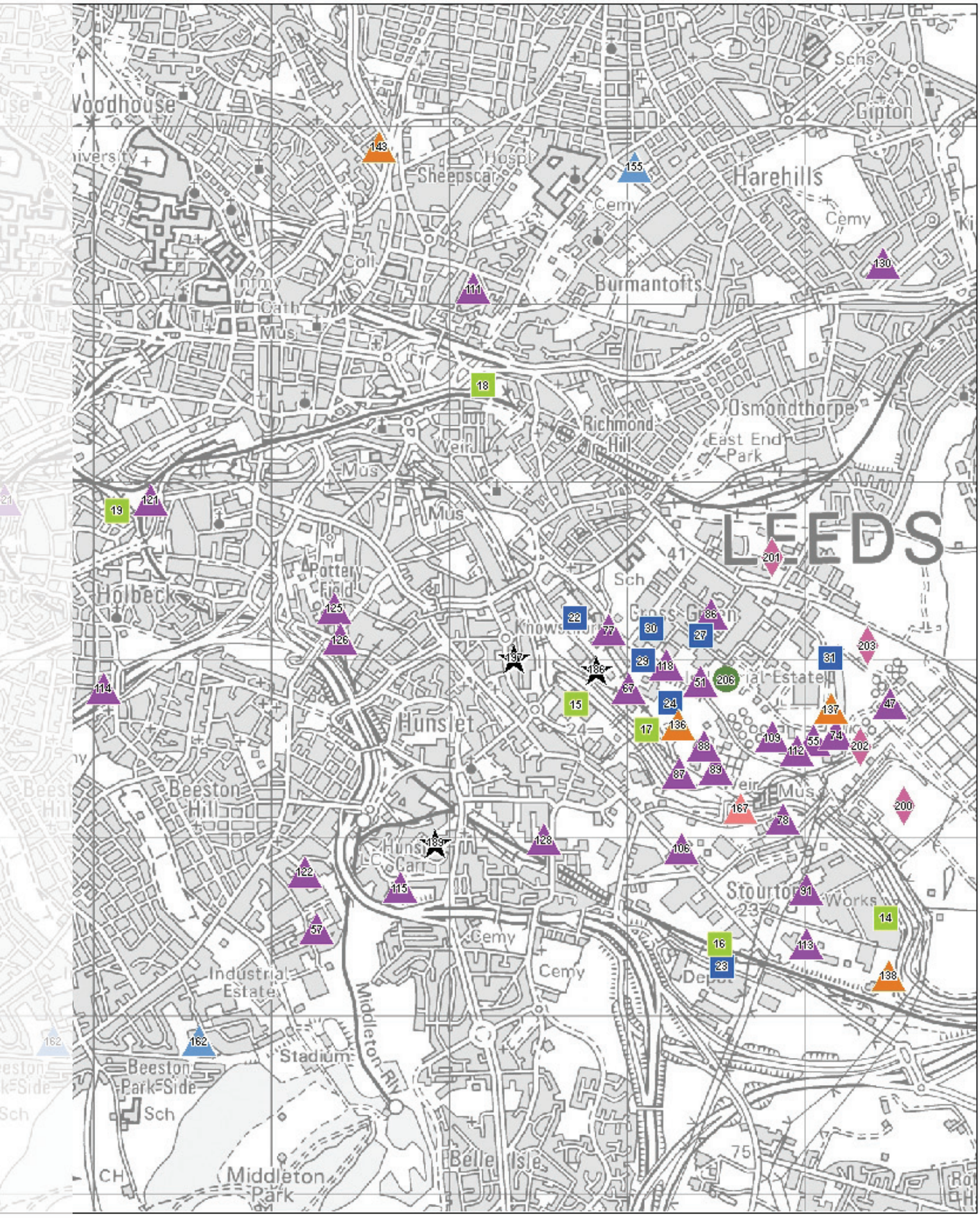
Map A2: Inset map




LEEDS
Voodhouse
Gipton
Harehills
Sheepscar
Burmantofts
Osmondthorpe
Richmond Hill
East End Park
Holbeck
Pottery Field
Hunslet
Beeston Hill
Industrial Estate
Stadium
Middleton Park
Belle Isle
Middleton Riv
Cemy
Sch
Mus
Weir
Coll
Hospl
Works
Depot
Gross Green
Stourton
Beeston Park Side

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Natural Resources and Waste

Leeds Local Development Framework

Development Plan Document

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