



Leeds City Council's Natural Resources and Waste Development Plan Document (NRWDPD)

Consultation Report

Prepared for
Leeds City Council

January 2009

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1 Introduction

1.1 Purpose of this report

This Consultation Report has been produced by the Jacobs' project team for Leeds City Council and presents the main findings emerging from the public and Stakeholder consultation undertaken at the Issues and Alternative Options stage for Leeds City Council's Natural Resources and Waste Development Plan Document, which will be referred to in this report as the NRWDPD. It also provides an evaluation of the consultation process.

This report will:

- **Review** the consultation aims and objectives as set out in the Consultation Strategy and Leeds Statement of Community Involvement (SCI);
- **Present** the findings emerging from the consultation responses; and analyse the results of questionnaires completed during the consultation (quantitatively where appropriate), and;
- **Evaluate** the consultation process and identify potential areas for improvement for future events.

1.2 Background

The Natural Resources and Waste Development Plan Document (NRWDPD) for Leeds will examine which existing planning policies are required to be reviewed and replaced, and which new issues and options need to be addressed. It will take into account the appraisal of natural resource requirements which were determined through the Natural Resource Flow Analysis (NRFA) and the Ecological Footprint.

The Natural Resources and Waste Development Plan Document (NRWDPD) encompasses issues of significant importance to people in the City of Leeds, therefore engaging with stakeholders is crucial to ensure that future development and planning activity takes place in the best informed and locally appropriate manner.

In February 2007 the Statement of Community Involvement (SCI) was adopted by Leeds City Council in response to the key changes required in the Planning and Compulsory Purchase Act 2004. Consultation is also a statutory requirement under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004.

Four periods of consultation will take place during the production of the Development Plan Document; the period of consultation under review in this report is the Issues and Alternative Options consultation. Figure 1 illustrates the timetable for the NRWDP, current at Issues and Options.

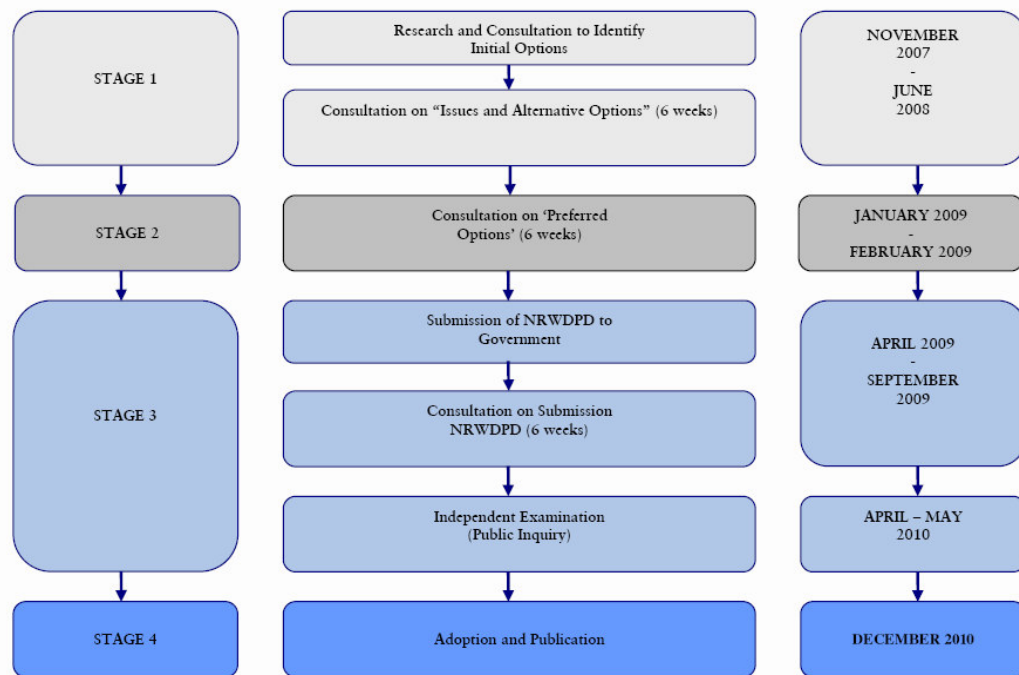


Figure 1 NRWDP Timetable (from the Consultation Summary document)

1.3 Context within the Local Development Framework (LDF)

Due to changes in the Planning and Compulsory Purchase Act (2004), all Local Authorities are required to replace the old Unitary Development Plan (UDP) - a land use plan setting out the objectives, policies and proposals for developments – with a Local Development Framework (LDF). The new LDF system, which takes national, regional and local policy and guidance into account, is designed to be a more flexible approach to planning as it contains a number of documents which can be individually updated to reflect changing local circumstances (see Figure 2).

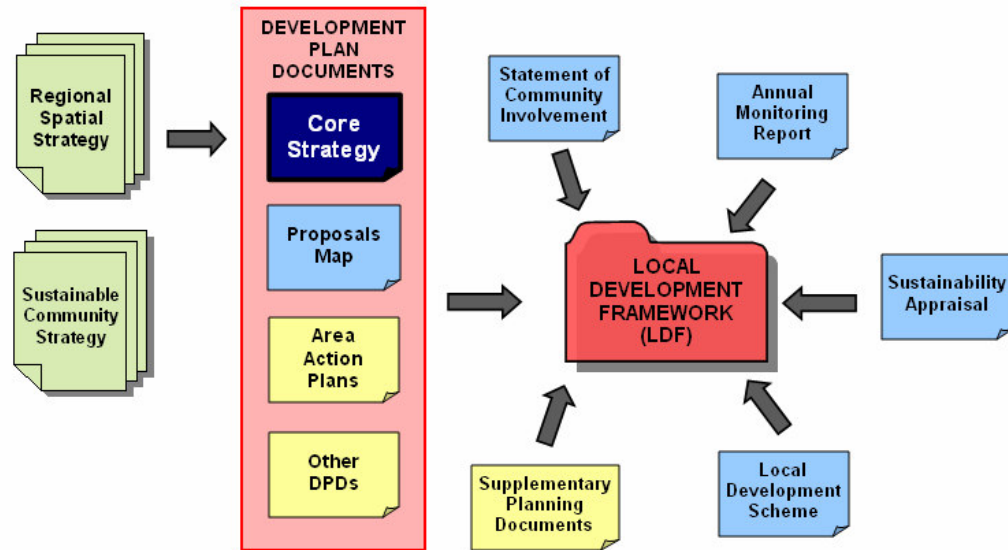


Figure 2 The structure of the Local Development Framework (LDF)

Blue documents are statutory components of the LDF, yellow documents are optional and produced at the discretion of the Local Authority; the NRWDPD is one of the Development Plan Documents (DPDs) required as part of the LDF.

1.4 What is the NRWDPD?

The NRWDPD will provide a policy framework on themes relevant to the Leeds City area for the future management of natural resources. As well as being statutory elements of the LDF, Development Plan Documents are:

- **Sound:** subject to rigorous procedures of community involvement, consultation, independent examination and test of soundness,
- **Sustainable:** subject to a Sustainability Appraisal to ensure economic, environmental and social effects are in line with sustainable development targets,
- **Significant:** will be used to make all development control decisions once adopted.

The NRWDPD itself is unique in the **holistic** and **innovative** nature of its content and approach. All Local Authorities are required under Section 16 of the Planning and Compulsory Purchase Act (2004) to produce a DPD on waste and minerals, however Leeds City Council are planning a more holistic policy document which incorporates six key inter-linked themes (see Figure 3).



Figure 3 The 6 key themes of the NRWDPD

All DPDs must be submitted to the Planning Inspectorate with a sound evidence base, usually consisting of the statutory Sustainability Appraisal, a consultation report and various statements of compliance; however Leeds' use of Natural Resource Flow Analysis (NRFA) and the Ecological Footprint (see Figure 4) to appraise natural resource requirements of the area are innovative additions to the NRWDPD submission.

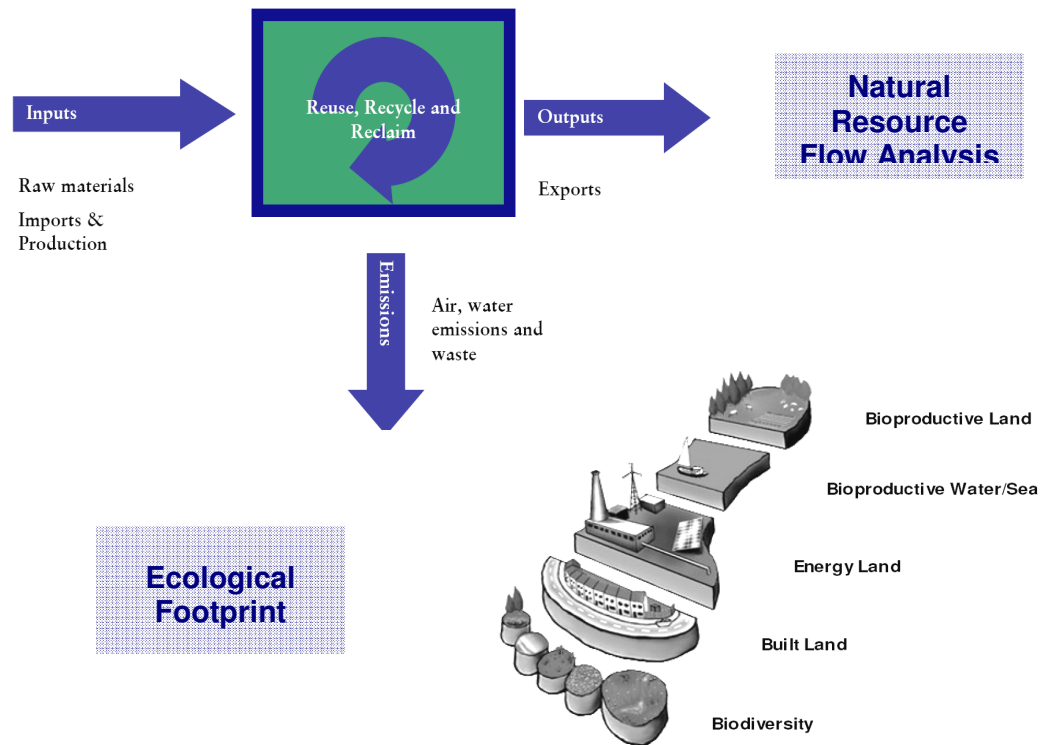


Figure 4 Elements of the NRFA and Ecological Footprint

2 Consultation Strategy

2.1 Consultation Aim and Objectives

In April 2008 the Jacobs' Public and Stakeholder Participation, Engagement and Communications team produced a Consultation and Communications Strategy detailing the NRWDPD's requirement, scope and objectives, and identified *who* needed to be engaged throughout the process and through *which* methods. The Consultation aim and objectives are detailed below.

Aim: To gauge opinion from a range of stakeholders and Leeds communities as to whether they agree with the content, scope and focus of the proposed Issues and Alternative Options or present alternatives.

Objectives:

1. Better informed policy formulation
2. Adding value through key areas of questioning
3. Full compliance with the Adopted Statement of Community Involvement (SCI)

Early consultation with key stakeholders undertaken in November 2007 fed into the preparation of the Issues and Alternative Options Report, which was approved for formal consultation by members at Plans Panel in December 2007. Representations made during this consultation period, along with the Natural Resource Flow Analysis (NRFA) and Ecological Footprint will inform the next stages of the NRWDPD preparation process.

2.2 Consultation Methodology

The Consultation Strategy was aimed at engaging the following stakeholders:

- Statutory consultees (e.g. Government Office, Environment Agency),
- Internal stakeholders (e.g. Leeds City Council Officers and Councillors),
- External stakeholders (e.g. Parish Councils, Highways Agency),
- The general public, and
- Hard-to-reach groups (e.g. via Leeds Local Access Forum, Leeds Voice Environmental Forum).

A wide range of documentation was produced in preparation for the Issues and Alternative Options consultation period, including the NRFA and Ecological Footprint, which will form part of the evidence base to be submitted along with the final NRWDPD to the Planning Inspectorate. During the consultation period, the package of publicly available documents included:

- Issues and Alternative Options (main report, 138 pages),
- Issues and Alternative Options – Consultation Summary (20 pages),
- Initial Sustainability Appraisal (171 pages),
- Natural Resources Flow Analysis (NRFA) (87 pages),
- NRFA Non-Technical Summary (16 pages),
- Ecological Footprint (34 pages),
- Questionnaire – Public (14 pages, 32 questions),
- Questionnaire – Mid Technical (18 pages, 39 questions),
- Questionnaire – Full Technical (16 pages, 41 questions)
- Information Boards which clearly explained the process in plain English (displayed at all exhibitions and Stakeholder events).

Throughout the six week consultation period all documentation was available in electronic format on the Leeds City Council (LCC) website, at all of the exhibitions and events held across Leeds and also in paper format at Leeds Central Library and One Stop Shops. The documents were also distributed to Stakeholders and copies of the documents were available on request from Jacobs.



Raising widespread awareness of the NRWDPD within the Leeds population was an important element of the consultation period, therefore the team communicated throughout the consultation period through the use of media and advertising. Jacobs worked in partnership with the media team at Leeds City Council to produce a press release introducing the key themes of the NRWDPD and inviting the public to attend a range of consultation events, complete a questionnaire or give us their views via email, the Leeds website or by telephone. The consultation events were advertised in the Yorkshire Post and the Evening Post as well as a number of local supplementary publications which promoted the NRWDPD across the region (e.g. the Armley and Garforth Local Pages). The drop-in sessions and static exhibitions (as detailed below) were also advertised on the large TV screen in Millennium Square.

Targeted consultation was undertaken whereby seldom heard and hard-to-reach groups were invited to give their views by disseminating information to organisations including Leeds Voice, whose role is to represent these groups as identified within the Statement of Community Involvement (SCI). Members of the project team additionally attended relevant forums including the Leeds Voice Environmental Forum monthly meeting to introduce the NRWDPD issues, take part in a question and answer session and allow members to gather information required for their consultation response. Leeds Voice is “a voluntary organisation which exists to represent and strengthen the Voluntary, Community and Faith Sector (VCFS) throughout the Leeds Metropolitan District” (from: <http://www.leedsvoice.org.uk/>), thus acting as an effective ‘piggyback’ event aiding access to hard-to-reach groups.

Table 1 outlines the timetable of consultation activities undertaken.

Activity	Date	Communication methods	Description
Early consultation	November 2007	<ul style="list-style-type: none"> Letter to stakeholders 	Early consultation took place in November 2007 to raise awareness of the NRWDPD issues and to gather initial opinions which fed into the Issues and Alternative Options report.
Statutory notice of consultation	Tuesday 6 th May 2008	<ul style="list-style-type: none"> Statutory notice published in the Yorkshire Evening Post and Leeds Weekly News 	Statutory notice required under The Town and Country Planning (Local Development) (England) Regulations 2004; published details of where documents can be accessed, and when and how to make representations.
Press release and media engagement	Thursday 8 th May 2008 (YEP and LWN). Tuesday 27 th May 2008 (ALP) Tuesday 3 rd June 2008 (GLP)	<ul style="list-style-type: none"> Press release LCC website Yorkshire Evening Post (YEP) advert Leeds Weekly News (LWN) advert Armley Local Pages (ALP) advert Garforth Local Pages (GLP) advert 	Adverts were placed in the Yorkshire Evening Post, the Leeds Weekly News, and the Armley and Garforth Local Pages publishing the dates of the drop-in sessions, static and supermarket exhibitions. A press release also announced the consultation period for the NRWDPD, and details of all involvement events.
Distribution of posters and NRWDPD documents	Thursday 8 th May – onwards	<ul style="list-style-type: none"> Press release LCC website Supermarket exhibitions (collected details for mail-outs of documents and additional questionnaires) A3 posters 	NRWDPD documents were available for inspection at the Development Enquiry Centre, City Development, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Monday – Friday 8:30 a.m. – 5 p.m., Wednesday 10 – 5 p.m.) and at local libraries and one-stop centres. Copies of documents were also available on request from Jacobs. A3 posters were distributed to key locations around Leeds including libraries, one-stop centres and supermarkets where exhibitions took place.
Information published on LCC website	Thursday 8 th May 2008	<ul style="list-style-type: none"> LCC website Web link included on all documents and letters 	Consultation dates and venues were published on the LCC website from the first day of the consultation period. All documents were available to view/download from www.leeds.gov.uk/ldf on the LDF homepage.
Drop-in viewing session (The Carriageworks, Leeds City Centre)	Thursday 8 th – Friday 9 th May 2008, 8:30am – 5pm	<ul style="list-style-type: none"> Press release LCC website Invitation letter to key stakeholders 	Held at the commencement of the consultation period, the two day drop-in sessions were attended by Jacobs team leaders, technical experts and the consultation team to provide further information on the NRWDPD prior to wider dissemination to other stakeholders and the public. Consultation materials included: <ul style="list-style-type: none"> Large information display board 2 smaller information boards All documentation (paper copies) PowerPoint presentation (looped)
Advert on large TV screen (Millennium Square, Leeds)	Thursday 15 th May – Thursday 16 th June 2008	<ul style="list-style-type: none"> Large screen advert 	Three page PowerPoint presentation advertising the consultation period of the NRWDPD, and dates and venues of static and supermarket exhibitions.



Activity	Date	Communication methods	Description
Static exhibition (Leeds Central Library)	Thursday 8 th May – Thursday 19 th June 2008	<ul style="list-style-type: none"> • Press release • LCC website • Invitation letter to key stakeholders • Big screen advert in Millennium Square 	Static unmanned exhibition for entire consultation period at a central location. Large display board explained the NRWDPD production process and key themes; paper copies of the main report were available.
Supermarket exhibitions (Horsforth, Seacroft, Chapel Allerton, St John's Centre, Armley, Otley, White Rose Centre, Rothwell, Merrion Centre, Kirkstall, Garforth)	Monday 12 th May – Saturday 14 th June 2008	<ul style="list-style-type: none"> • Press release • LCC website • Invitation letter to key stakeholders • Big screen advert in Millennium Square 	<p>Supermarkets were chosen as locations to host exhibitions due to the topical nature of issues raised by the NRWDPD (e.g. plastic carrier bags, food waste, amount of money spent on food). At least three Jacobs' staff (including one technical expert) were present at each supermarket exhibition to discuss and record people's comments, and hand out questionnaires. Exhibition venues were selected to cover as wide a geographical area as possible, and a range of supermarkets which provided permission to undertake the activity (Morrisons, Tesco, Somerfield, Waitrose). Consultation materials included:</p> <ul style="list-style-type: none"> • 2 small information display boards • Copies of the Public Questionnaire and Consultation Summary.
			
Internal meeting (planning workshop format)	Thursday 22 nd May 2008, 10am – 3pm		An internal meeting (Jacobs team only) was held to decide on the approach and format of the two stakeholder workshops. Workshop objectives, expected outputs, and proposed formats were discussed, and a list of potential FAQ's was devised.
Stakeholder Workshops (Leeds Town Hall)	Tuesday 10 th and Friday 13 th June 2008, 9:30am – 4pm	<ul style="list-style-type: none"> • Invitation letter to all internal and external stakeholders • Follow up phone calls to invitees to encourage attendance 	The morning workshop session involved presentations from various members of the project team (Jacobs and LCC) by way of introduction to the NRWDPD, progress so far, next steps and Q&As. Afternoon sessions involved stakeholders visiting themed boards and leaving their comments on post-it notes to give an indication as to whether they felt the Issues and Options were right at this stage; group discussions then expanded on common issues emerging from the boards.
			
Targeted consultation (Leeds Voice Environment Forum, Aggregate Industries)	Tuesday 3 rd June 2008, 7pm – 9pm Tuesday 15 th July 2008, 11am – 12.30pm	<ul style="list-style-type: none"> • Letter to forum coordinator with consultation information to cascade to members and circulate on blog • NRWDPD on meeting agenda 	In addition to other relevant forums, the team attended the Leeds Voice Environmental Forum monthly meeting to introduce the NRWDPD issues, take part in a Q&A session and allow members to gather information required for their consultation response. Also attended ad-hoc consultation meeting with Aggregate Industries at request of stakeholder.

Activity	Date	Communication methods	Description
Follow up phone calls	Monday 16 th June – Friday 20 th June 2008	<ul style="list-style-type: none"> Follow up phone calls 	Stakeholders who didn't attend workshops were phoned again to encourage them to complete a questionnaire. Questionnaires were sent out after the official deadline; it was made clear that stakeholders would still be able to respond and have comments included in the consultation.

Table 1 Consultation activities undertaken for Issues and Alternative Options

2.3 Leeds City Council’s Statement of Community Involvement (SCI)

The Statement of Community Involvement (SCI) is the Council’s statement on how the local community and others will be involved in the preparation of the Local Development Framework and the consideration of planning applications. An independent inspector examined the soundness of the SCI following its submission to the Secretary of State on 27th April 2006; it was found to be “sound” subject to some minor amendments, and was adopted on 21st February 2007.

The principles set out in the SCI are intended to ensure that the community has an opportunity to be heard, have concerns responded to and to receive feedback; there are seven principles in the SCI:



1. Early contact
2. Access to information
3. Appropriate methods
4. Reduce barriers
5. Collaboration
6. Feedback
7. Learn and improve

Table 2 highlights how the SCI principles were met in the Consultation Strategy used by Jacobs.

Principle	What this means for the community	How was this catered for in Jacobs Consultation Strategy?
Early contact	“In all cases Leeds City Council will involve stakeholders at the earliest practical possible point, this is sometimes known as ‘front loading’”	<ul style="list-style-type: none"> • Early consultation was carried out in November 2007 to inform the Issues and Alternative Options report. • Consultation period at Issues and Alternative Options stage provided an additional opportunity for early stakeholder input prior to Preferred Options.
Access to information	“All documents will be set out clearly and written using straight forward language without jargon or abbreviations. Where abbreviations have to be used, a full explanation will be provided”	<ul style="list-style-type: none"> • All documents produced to standard Leeds City Council format, in Arial 10 point font. • All NRWDPD documents contain abbreviations however are listed and fully explained where necessary. • Original drafts of the questionnaire were considered too technical in nature (especially for the general public) therefore three versions of questionnaire were created to cater for a range of knowledge levels and technical abilities; full technical, mid technical and public. Stakeholders were invited to complete more than one version if required. • Due to the technical nature of the NRWDPD, engagement of stakeholders where English was not a first language was challenging. However, interpretation services were offered by the Council for over 100 languages; the documents were also available in Braille and audio format on request.
	“It will be made clear what you can comment on or change and when comments should be made”	<ul style="list-style-type: none"> • The Consultation Summary (and other documents) details the issues that are within the scope of the NRWDPD, and what the Council hope to get out of the consultation. • The Consultation Summary, all three versions of the questionnaire, press releases, adverts and the website page clearly state the consultation closing date as 5pm Thursday 19th June. Stakeholders were offered a postal address, email address and phone number for returning responses. • In follow up phone calls carried out after the consultation deadline, it was made clear that responses were still being accepted
	“Information will be made available in a range of accessible formats”	<ul style="list-style-type: none"> • Original drafts of the questionnaire were considered too technical in nature (especially for the general public) therefore three versions of questionnaire were created to cater for a range of knowledge levels and technical abilities; full technical, mid technical and public. Stakeholders were invited to complete more than one version if required. • Printed and electronic copies of all documents were available from a range of sources. • The Consultation Summary and the Natural Resource Flow Analysis Non-Technical Summary made long and technical documents more accessible and easier to read for a wider audience.
	“Summaries of all longer documents will be published (documents that are longer than 25 pages of A4)”	<ul style="list-style-type: none"> • The Consultation Summary was produced to summarise the 138 page Issues and Alternative Options main report; and the Natural Resource Flow Analysis Non-Technical Summary summarised the 87 page Natural Resource Flow Analysis.

Principle	What this means for the community	How was this catered for in Jacobs Consultation Strategy?
	<p>“Where possible all documents will be made available in electronic form”</p>	<ul style="list-style-type: none"> • All documents are available to view and download in PDF format from the Council website (www.leeds.gov.uk/ldf).
<p>Appropriate methods</p>	<p>“Consultation and involvement activities will be planned in a consistent way to ensure that the processes used are the right ones to use in each case”</p>	<ul style="list-style-type: none"> • A range of consultation methods were used in an attempt to make the consultation accessible and to effectively engage as many stakeholders as possible. Methods included letters, emails, questionnaires (sent by post and email), static unmanned information displays, informal supermarket exhibitions, formal stakeholder workshops, attendance at existing meetings (e.g. Leeds Voice), and ad-hoc meetings with key stakeholders as requested (e.g. Aggregate Industries). • Invitations to stakeholder events were sent by email and letter, and followed up with a phone call.
<p>Reduce barriers</p>	<p>“Leeds City Council will make every effort to meet the requirements of the Race Relations Act (2000) and the Disability Discrimination Act (1995)”</p>	<ul style="list-style-type: none"> • Due to the technical nature of the NRWDPD, engagement of stakeholders where English was not a first language was challenging. However, interpretation services were offered by the Council for over 100 languages; the documents were also available in Braille and audio format on request. • The venue for the stakeholder workshops (Leeds Town Hall) was fully accessible to the physically disabled. • Hearing aid loops were available (and used) at the Stakeholder Workshops in Leeds Town Hall for those stakeholders who were hearing impaired. • A member of staff was designated to a stakeholder with M.E. who attended one of the Stakeholder Workshops, for note taking and one-on-one discussion about topics on the boards. • A3 posters drawn up displaying the workshop programme/agenda were found to contain text with font size that was too small; these were removed from display.
	<p>“The Council will seek to carry out involvement activities that fit your time, knowledge and experience”</p>	<ul style="list-style-type: none"> • Original drafts of the questionnaire were considered too technical in nature (especially for the general public) therefore three versions of questionnaire were created to cater for a range of knowledge levels and technical abilities; full technical, mid technical and public. • Separate stakeholder workshops were held for internal (Council) and external (other) stakeholders so that information could be tailored to suit their technical ability and various agendas; presentation content and focus varied across the two workshops. • In response to poor attendance confirmation Stakeholder Workshops were rescheduled to avoid conflict of dates with a Council Day. • Supermarket exhibitions were designed to make consultation as easy for stakeholders as possible; engagement was built into everyday shopping activities rather than requiring a special effort on behalf of the public to attend a central exhibition. • The consultation period was unofficially extended through continued acceptance of comments after the consultation deadline in an attempt to include as many stakeholder views as possible.

Principle	What this means for the community	How was this catered for in Jacobs Consultation Strategy?
	<p>“Opportunities will be provided to consult those parts of the community which do not normally get involved in planning issues”</p>	<ul style="list-style-type: none"> • Jacobs undertook targeted consultation with groups that are traditionally seldom engaged, or hard-to-reach. Stakeholders such as the Leeds Racial Equality Council and the Leeds Local Access Forum were invited to workshops and exhibitions, and also received follow up calls to encourage them to complete a questionnaire. • Targeted consultation also involved attending the Leeds Voice Environmental Forum monthly meeting to introduce the NRWDPD issues, take part in a question and answer session and allow members to gather information required for their consultation response. Leeds Voice is “a voluntary organisation which exists to represent and strengthen the Voluntary, Community and Faith Sector (VCFS) throughout the Leeds Metropolitan District” (from: http://www.leedsvoice.org.uk/), thus acting as an effective ‘piggyback’ event aiding access to hard-to-reach groups. • Additional targeted consultation with various hard-to-reach groups through the Little London Community Centre is still to be undertaken.
	<p>“As far as resources permit, documents will be made available for free”</p>	<ul style="list-style-type: none"> • All documents are freely available in paper format from libraries and one-stop centres, and on request from Jacobs. Documents can also be viewed and downloaded for free from the Council website. • Questionnaires posted to stakeholders as part of the ongoing follow up consultation activity were accompanied by a freepost addressed envelope for ease of return to Jacobs. The freepost address was published in all documents, and envelopes were available at supermarket exhibitions on request.
	<p>“Documents will also be made available on the Leeds City Council web site and, where possible, in local community venues like libraries”</p>	<ul style="list-style-type: none"> • Printed and electronic copies of all documents were available from a range of sources. • The NRWDPD documents were available for inspection at the Development Enquiry Centre, City Development, Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD (Monday – Friday 8:30 a.m. – 5 p.m., Wednesday 10 – 5 p.m.) and at all local libraries and one-stop centres. • Paper and electronic copies of documents were also available on request from Jacobs.
	<p>“The Council may actively seek out your involvement”</p>	<ul style="list-style-type: none"> • Public involvement was actively sought at the supermarket exhibitions; people showing an interest in the information boards were asked if they would like any further information, a questionnaire or to leave a comment.
<p>Feedback</p>	<p>“Leeds City Council will make feedback available to you on comments received in a summary format and within a specified time period. The Council may choose to exclude some comments from the feedback documents if they are deemed to be inappropriate, racist, sexist, homophobic, slanderous or in some other way inflammatory”</p>	<ul style="list-style-type: none"> • Where possible (e.g. at stakeholder workshops and supermarket exhibitions) direct feedback has been given to the stakeholder if the appropriate technical expert was able to answer the query or address the comment. • Responses to consultees may be generic and only where a unique point is raised will a specific answer be provided. Responses will be given to those stakeholders who provide contact details (postal address, email or phone number) once the consultation has moved onto the next step.
<p>Learn and improve</p>	<p>“Leeds City Council will continue to improve our involvement practice through evaluating what the Council does”</p>	<ul style="list-style-type: none"> • Numerous comments were recorded throughout the consultation period regarding the Council in general and their approach to consultation in particular; all comments, including those not directly related to the NRWDPD were recorded and reported back to LCC.

Principle	What this means for the community	How was this catered for in Jacobs Consultation Strategy?
	“The Council will seek out ways to assess and improve involvement skills”	<ul style="list-style-type: none"> • Numerous comments were recorded throughout the consultation period regarding the Council in general and their approach to consultation in particular; all comments, including those not directly related to the NRWDPD were recorded and reported back to LCC.
	“The community will be invited to comment on the Council’s involvement activities to help improve consultation”	<ul style="list-style-type: none"> • Some discussions held at supermarket exhibitions were non-NRWDPD related, and often these consisted of discussions about the approach to consultation or the Council in general. All discussions were recorded in the comments book and consultation related feedback will be included in the Consultation Report.

Table 2 Leeds SCI principles

3 Consultation Responses

Consultation responses and comments were received in a variety of formats, including emails to the NRWDPD inbox (nrwdpd@jacobs.com); via post (either direct to Jacobs or the freepost address); completed questionnaires; post-it notes at the Stakeholder Workshops; verbal comments during Q&A sessions or the ‘hot topic’ desk at Stakeholder Workshops; and, informal conversations recorded in the comments book at Supermarket Exhibitions, and at Stakeholder Workshops. The total number of responses received and consultation materials issued is detailed in Table 3.

Response format	Summary of total responses received
Statutory Responses	<ul style="list-style-type: none"> 6 responses received.
Written Responses (Post and Email)	<ul style="list-style-type: none"> 16 responses (Internal, External, Public).
Stakeholder Workshops	<ul style="list-style-type: none"> 15 out of 166 invited attended workshop 1. 15 out of 183 invited attended workshop 2. 137 post it notes completed.
Supermarket Exhibitions	<ul style="list-style-type: none"> 875 questionnaires issued. 8656 glances recorded. 32 comments recorded.
Questionnaires	<ul style="list-style-type: none"> 53 completed questionnaires were returned (13 Full Technical, 3 Mid Technical, 37 Public).
Targeted Consultation	<ul style="list-style-type: none"> 2 responses received.

Table 3 Summary of total responses received

All responses were logged on a Stakeholder Response Database and categorised into key themes. The following sections present the main findings of the Issues and Alternative Options consultation by stakeholder type or consultation activity.

3.1 Statutory Consultee Responses

The Town and Country Planning (Local Development) (England) Regulations 2004 list ‘specific consultation bodies’ who must be consulted by the Local Planning Authority when preparing DPDs in which they may have an interest; in this case the Environment Agency, English Heritage and Natural England. Leeds City Council also included the Yorkshire and Humber Assembly, the Government Office for Yorkshire and the Humber (GOYH), the Planning Inspectorate and Yorkshire Forward; these

are not defined as statutory consultees within the Regulations but LCC include them for best practice.

Consultation responses from the seven Statutory Consultees were assigned a traffic-light rating based on the impact of the response on the NRWDPD Issues and Options content, direction and timescale of document preparation; **Significant**, **Moderate** or **No** impact. Table 4 details the date, format and significance rating of these statutory consultee responses.











Consultees	Date of Response	Format of Response	Impact Rating
Yorkshire and Humber Assembly	10 June 08	Email with letter attached	
Government Office for Yorkshire & The Humber	19 June 08	Email and 8 page letter	
Environment Agency	19 June 08	Email and 3 page letter	
Yorkshire Forward	18 June 08	Email and 2 page letter	
English Heritage	12 June 08	Email and two 3 page letters	
Natural England	18 June 08	Email and 21 page letter	
Planning Inspectorate	No response received for Issues and Options stage and none would normally be anticipated		
	Consultation responses have had a significant impact on the NRWDPD content, direction and timescale of the document preparation.		
	Consultation responses have a moderate impact on the NRWDPD content, direction and timescale of the document preparation.		
	Consultation responses have no impact on the NRWDPD content, direction and timescale of the document preparation.		

Table 4 Statutory Consultees

Responses received from these Statutory Consultees had varying effects on the content, direction and timescale for production of the NRWDPD. Responses received from the Environment Agency, Yorkshire Forward, English Heritage and Natural England were given a **moderate** impact rating; stakeholders were principally satisfied with the content and focus of the DPD and highlighted relatively minor issue-specific comments which will be considered within the next stages of the DPD where appropriate. The response received from the Government Office for Yorkshire & the Humber, however, was assigned a **significant** impact rating as it voiced concerns

over the role of the DPD in the wider context of the Local Development Framework (LDF) with specific reference to the Core Strategy. Table 5 summarises the main issues raised by the Statutory Consultees; full responses are included by theme in Appendix A.

Statutory Consultee	Summary of response
Environment Agency	<ul style="list-style-type: none"> • Pleased with range of themes addressed • Agree that waste must be treated as a potentially valuable resource • Support the NRFA as source of baseline evidence • Favour strategic approach to waste management through regional partnerships • Support all options which take into account sustainable transport, energy use, climate change factors, water efficiency and biodiversity
English Heritage	<ul style="list-style-type: none"> • NRWDPD objectives fail to mention minimising potentially adverse environmental impacts of each key theme • Should include policies to minimise construction waste and encourage re-use of existing buildings • Future mineral extraction should preserve landscape character and historical assets of Grade 1 Registered Historic Park and Garden at Harewood. • Specific comments made about the Sustainability Appraisal.
Natural England	<ul style="list-style-type: none"> • Agree with scope of NRWDPD; emphasis needed on landscape character (perhaps as SPD), green infrastructure and biodiversity • NRWDPD should refer/link to Sustainable Design SPD, Biodiversity Action Plans, and Leeds Green Space Strategy • Pleased with NRFA but note absence of Habitat Regulations Assessment report • Range of detailed issue specific comments by key theme
Yorkshire and Humber Assembly	<ul style="list-style-type: none"> • No comments at this stage • Offered to clarify NRWDPD in context of Regional Spatial Strategy (RSS)
Government Office for Yorkshire and the Humber	<ul style="list-style-type: none"> • Core Strategy should provide steer; NRWDPD too strategic • NRWDPD should be published after Core Strategy if still necessary • Concerned about inclusion of non-waste key themes • Long, unclear and sometimes inconsistent documentation • Issue specific comments about clarity and conformity with existing legislation • Leeds should take more positive and proactive approach
Planning Inspectorate	<ul style="list-style-type: none"> • No response received for Issues and Options; will be required to comment at the next stage of consultation
Yorkshire Forward	<ul style="list-style-type: none"> • No comments about focus or direction of NRWDPD; issue specific comments only • Endorse aspirational 'zero waste' target, self-sufficiency in waste treatment, landfill as a last resort, Combined Heat and Power (CHP), on-site energy generation, minimised travel demand, water efficiency in new developments, and use of green space for tackling effects of climate change • NRWDPD should include section on Green Infrastructure

Table 5 Summary and impact rating of responses from Statutory Consultees

3.2 Written Responses (Internal, External and Public Stakeholders)

Consultation responses were received via post and email by external stakeholders (e.g. the Highways Agency), internal stakeholders (e.g. Leeds City Council Officers and Councillors) and the general public. These responses are detailed in Appendix B and split by theme.

3.3 Stakeholder Workshops

Two Stakeholder Workshop events were originally planned for Thursday 22nd May and Friday 23rd May 2008, however in response to members request for new dates due to their inability to attend on those dates, the workshops were rescheduled by Jacobs for Tuesday 10th June and Friday 13th June 2008 and to further avoid a conflict of dates with a Council Day. This directly complies with the Council's SCI principle to 'Reduce Barriers' by seeking "to carry out involvement activities that fit your *time*, knowledge and experience".

Stakeholders were split across two workshop events to enable information to be tailored to suit their technical ability and varying needs. The workshop held on Tuesday 10th June was for 'internal' stakeholders consisting of Leeds City Council Officers and Councillors; the workshop held on Friday 13th June was for 'external' stakeholders consisting of Parish Councillors, environmental organisations, NGOs, representatives from the voluntary sector, and other non-Council organisations.

166 internal stakeholders were invited to Workshop 1 and 183 external stakeholders invited to Workshop 2 or alternatively they were invited to provide their views via the questionnaire, in writing, in an email or by telephone. Although only 15-20 of those invited attended each of the workshops, these figures appear normal according to definitions by the SDC and Community Power Pack; a stakeholder workshop is "a facilitated group discussion that provides participants with the opportunity to consider an issue in depth, challenge each other's opinions and develop their views to reach an informed end position"¹ that usually involves "*between 10 and 20 people for half or one day*"².

¹ Sustainable Development Commission. (2007). Definitions of Engagement Terms and Methods, http://www.sd-commission.org.uk/publications/downloads/Engagement_Definitions.pdf, accessed 18th August 2008.

² Communities and Local Government. (2008). Community Power Pack. <http://www.communities.gov.uk/documents/communities/pdf/743378.pdf>, accessed 18th August 2008.

The Morning session of the workshops included a Question and Answer session (the details of which are included in Appendix D by theme). During the afternoon session of the workshops, delegates were invited to visit four topic boards (see Figure 5) around the room and leave comments on post-it notes denoting whether they agreed with the Issues and Alternative Options report, or whether they disagreed with the content and direction of the NRWDP so far (post-it notes are included in Appendix E by theme). Key points were identified by facilitators and formed the basis of subsequent group discussions.

Minerals, Aggregates and Waste

Land Use and Water Resources

**Local Development Framework
Natural Resources and Waste Development Plan Document (NRWDP)**

Minerals, Aggregates and Waste

Minerals and Aggregates - The Challenge

Mineral Resources play a vital part in the construction of buildings which provide new homes, places for employment and the infrastructure necessary to sustain economic growth. They are a finite resource and the extraction and processing of minerals must be carefully managed to avoid significant impacts on the environment. This means that planning for a supply of minerals has a number of special characteristics:

- Minerals are only to be worked where they are found and must be protected to prevent essential use or deterioration.
- Ancillary uses such as production of recycled aggregates can reduce the pressure on primary resources and should be planned for together with mitigation of adverse environmental impacts.
- The selection of primary minerals is a temporary decision but it may have a long term consequence.
- There is a need to ensure that land is returned to an appropriate beneficial use once mineral extraction is completed.

Work so far

The Council has already produced an Integrated Waste Management Strategy and embarked on a process to identify preferred sites for a major new waste facility. The programme to deliver a contractor to operate these new facilities has now begun with the aim of having the new facility operational by 2014. However, this is only one of several activities which the Council must take in facilitating the delivery of new waste facilities. The NRWDP is crucial in planning for all waste streams and not just waste produced by households.

Do you agree?

The issues and options work undertaken so far has identified a number of key issues to consider. We want your views on whether you agree with them.

Waste

- Whether Leeds should just plan for its own waste or also consider cross boundary waste issues given its role in the wider Leeds City Region?
- If waste facilities should be located together and concentrated in a better corner of Leazes Road?
- That certain parts of the City are more suitable and therefore represent the most suitable location for waste uses?

Minerals and Aggregates

- Is prudent use and protection of mineral resources a priority?
- Should sites be allocated for aggregate recycling facilities or other associated uses such as concrete banking?
- What types of other use are appropriate once extraction is completed?

**Local Development Framework
Natural Resources and Waste Development Plan Document (NRWDP)**

Land Use and Water Resource

Land Use - The Challenge

Leeds is a finite resource and needs to be managed carefully to achieve a balance between strong forward development to improve social and economic conditions in the area and protecting environmental quality. Although the Leeds City Council area includes a major urban centre, the majority of land is classed as green space (e.g. agricultural land, parkland).

National and regional planning policy presumes in favour of development on Brownfield (previously owned) land as opposed to Greenfield land. Leeds currently exceeds national targets for development on Brownfield Land. However there are practical difficulties with development on Brownfield land such as:

- Overhead lines for power lines (a residential development is an outlier to this)
- Poor traffic and utilities infrastructure causing significant congestion to local and appropriate demand for new development.
- Decreases in air quality from more development and
- Severe contamination

Water Resources - The Challenge

Water is a scarce resource in England and Wales, and local authorities, including Leeds City Council, face three key challenges to protect and make the best use of the resource:

- Minimising demand and making efficient use of water in developments.
- Preventing flood risk and
- Protecting and improving water quality to meet the targets of the Water Framework Directive.

Leeds suffers from flooding as demonstrated by the floods of 2007. A review of all flood defences together with looking at maintenance options will be undertaken. However, a major contributor to the flooding issues in Leeds is its inadequate drainage capacity. Also, whilst the water quality is generally classed as 'good' or 'B+', improvements are still needed.

What the NRWDP will do:

The NRWDP will continue to encourage the development of Brownfield Land in order to protect Greenfield and green belt land, however it will consider opportunities for innovation in achieving sustainable forms of development, for example the greening of Brownfield sites to combine with new development on Greenfield land, and measures to encourage the remediation and reuse of formerly contaminated sites. It will also provide policies that promote water efficient developments, protection and improvement of water quality, and will encourage the use of measures to minimise burdens on the city's drainage capacity.

The issues and options work undertaken so far has identified a number of key issues to consider. We want your views on whether you agree with them:

- Where land is constrained to the extent that development is restricted, how could the Council reasonably encourage or require its development or redevelopment through the NRWDP? What types of land use could be appropriate if the constraints are not removed?
- Optimal inter-relationships between land use and the other themes of the NRWDP, and potential areas of conflict/resolution.
- Since the Issues and Options Paper has been published, I have been told that there is a localised area of water quality problems in certain parts of the city. Any proposed remedial works to improve water quality should be applied to the whole City area, with significant resource implications for the Council. Do you think this is a justified use of resources?
- What types of water efficiency measures should be promoted within Leeds?
- Should water efficiency and the reduction/avoidance and recycling of water resources be promoted in all new developments, or in a limited number of cases?
- How should the NRWDP address meeting social and economic development needs in conjunction with protecting water quality? Is it appropriate to protect land from development in sensitive locations for water resources, or better to treat such protection on a case by case basis?

Sustainability and Integration

Energy, Climate Change and Air Quality

Do you agree?

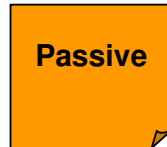


Figure 5 The four topic discussion boards and post-it note key



3.4 Supermarket Exhibitions

Supermarkets were chosen as a suitable location for a number of public exhibitions in LCC’s effort to ‘take consultation to the people’ at venues with high community ‘footfall’. A range of Supermarket brands were chosen that attracted different types of demographics and community members. Figure 6 shows a graphical representation of number of studies of the board (light blue) and number of questionnaires issued (dark blue) at each of the 11 exhibition locations.

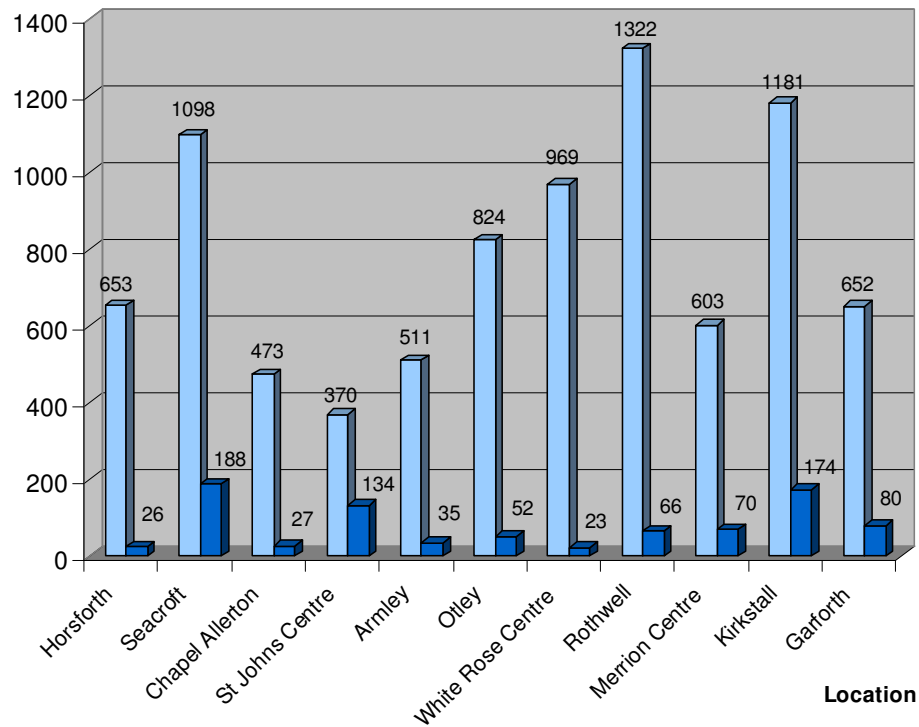


Figure 6 Number of attendees and questionnaires issued at supermarket exhibitions

Exhibition locations were decided based on the supermarket’s role as a shopping and therefore congregational centre for the area, and also the availability and willingness of the specific venue to participate. Figure 7 shows the geographical extent of exhibition locations across the Leeds City region. The only issue raised with the choice of locations for consultation was by a Councillor who was concerned about the lack of consultation in her ward (Farnley and Wortley), however it was explained that exhibitions were designed to supplement the range of other activities taking place, rather than to provide blanket coverage of the whole City region as a standalone method of consultation and that the team anticipated attendance at one of many venues accessible in the wider area.

Most discussions held with the general public at supermarket exhibitions centred around two topic areas; Waste and Recycling, and Leeds City Council in general. Exhibition comments are summarised in Figure 8, with example quotes to illustrate issues and detailed in Appendix C.

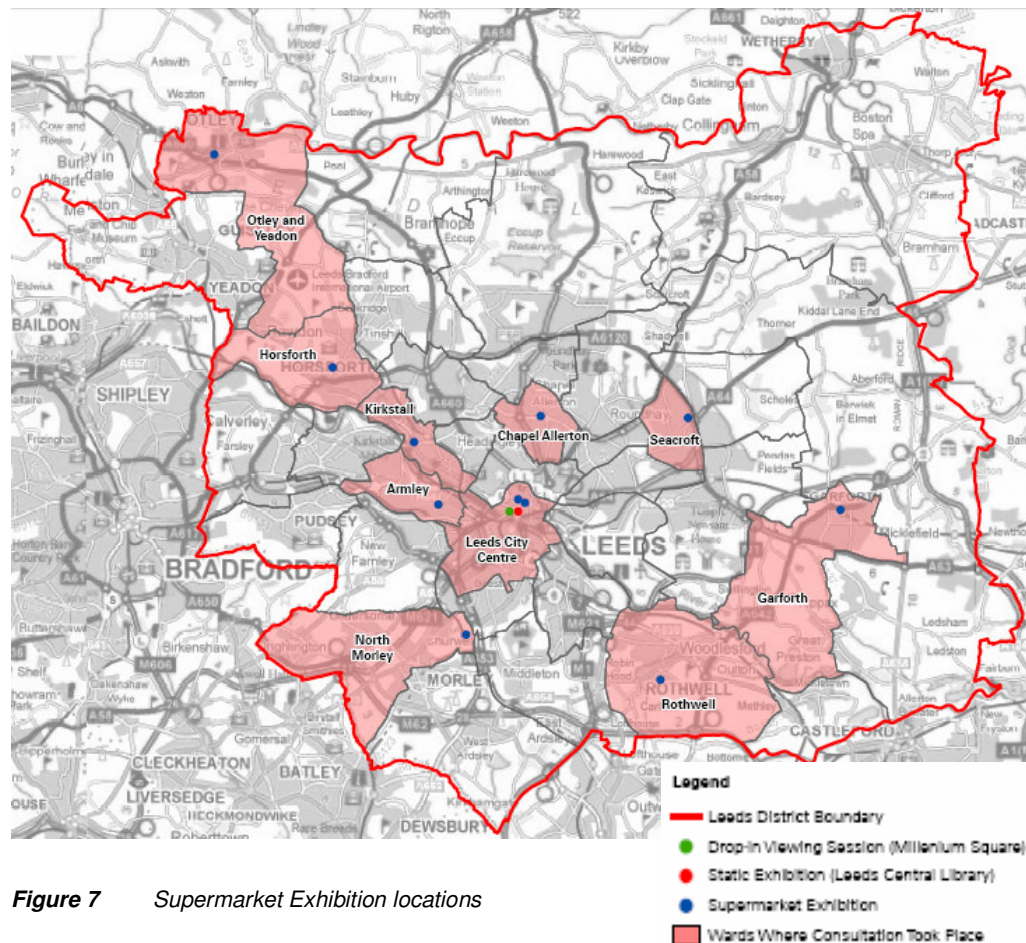


Figure 7 Supermarket Exhibition locations

Waste and Recycling...	Leeds City Council...
<ul style="list-style-type: none"> Infrequency of bin collection and associated waste storage issues Difficulties in accessing local facilities Lack of knowledge and guidance on what can be recycled More information required; where does waste go once collected? Why are we sending waste to china? What is the point in recycling if commercial waste is landfilled anyway? Willingness and desire to recycle in Leeds but disheartened by Council's approach to recycling 	<ul style="list-style-type: none"> People feel over-consulted Lack of trust of Leeds City Council Doubt whether their opinions actually make any difference Need for faster, more visible action by the Council



Figure 8 Summary of main issues emerging from supermarket exhibitions (including example quotes)

3.5 Questionnaires

In addition to the consultation methods previously described, questionnaires were used to collect quantitative and qualitative information on the Issues and Alternative Options. In order to more effectively target different audiences, three versions of the questionnaire were produced and all were available from the Leeds City Council website, from supermarket exhibitions and stakeholder workshops, and from Jacobs on request. 53 stakeholders and members of the public completed a questionnaire; Figure 9 illustrates the percentage of respondents completing the different versions.

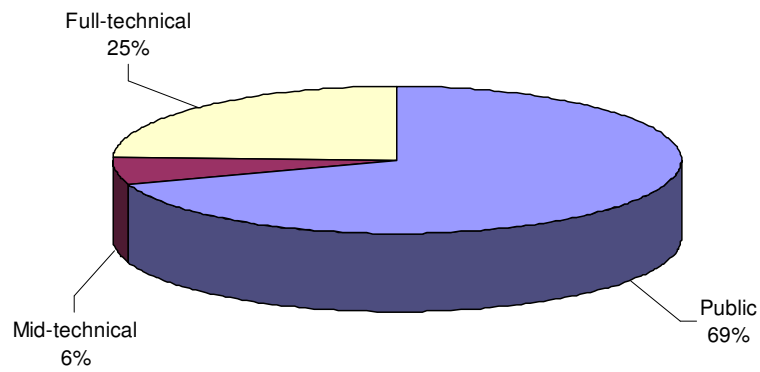


Figure 9 Percentage of questionnaire respondents across the three versions

Key Themes

Figure 10 represents the relative perceived importance of the six key themes of the NRWDPD by questionnaire respondents.

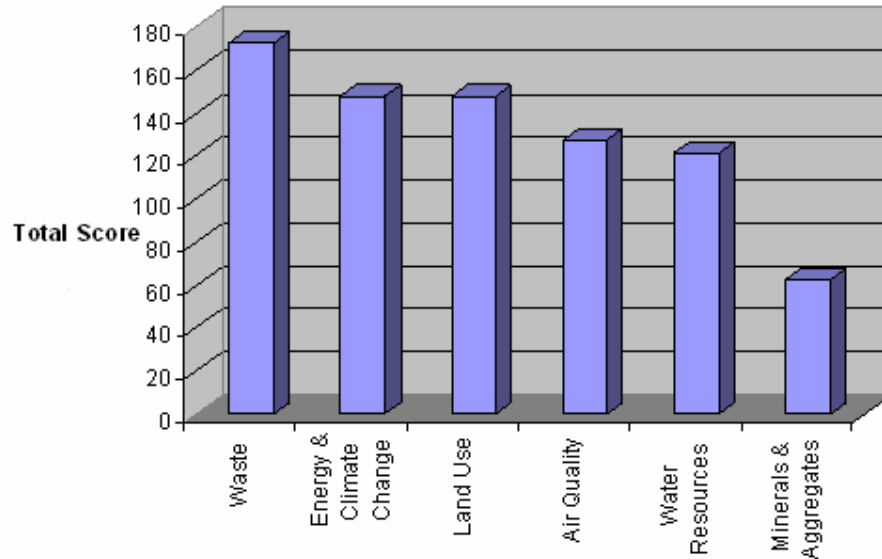


Figure 10 Key themes ranked by questionnaire respondents in order of importance

Public questionnaire respondents were asked to rank the six key themes in order of importance to them, with 1 being the most important and 6 being the least (scores were inverted to allow for cumulative perceived importance to be graphed). ‘Waste’ is the key issue for most respondents. 75.68% ranked it as the one of their top three most important issues. 56.76% ranked ‘Minerals and Aggregates’ as the least important issue. One respondent assigned the first place rank to all six key themes indicating a high importance for all issues and suggesting that due to their interlinked nature, one cannot be considered more important than another.

Technical questionnaire respondents were simply asked whether or not they agreed with the inclusion of the key themes in the NRWDPD; 61.54% of respondents agreed (the remaining respondents didn’t specify a preference; no respondents disagreed).

All questionnaire respondents were asked to identify ‘other theme considerations’; suggestions included food supply, degradation of the natural environment, noise and light pollution, supermarket packaging, loss of species, human overpopulation, safeguarding of soils, and biodiversity.

Full questionnaire results are included by theme in Appendix F. The following sections present summaries of the most popular issues (those answered by the most number of questionnaire respondents), namely;

- **Waste** – ‘planning for future waste’, ‘landfill provision’, and ‘increasing and encouraging re-use, recycling and composting’.
- **Minerals and Aggregates** – ‘sand and gravel’, ‘recycled materials’, and ‘after use’.
- **Land Use** – ‘contaminated land’.
- **Energy and Climate Change** – ‘primary energy sources’, ‘renewable energy sources’, and ‘micro-generation’.
- **Water Resources** – ‘water quality’, and ‘drainage’.
- **Air Quality** – ‘air quality improvement’.

3.5.1 Waste

Issue 2: Planning for Future Waste

The Regional Spatial Strategy states that authorities should consider liaison with neighbouring authorities and waste transfers across regional boundaries to ensure waste is managed close to its source. Stakeholders were asked which of the following options is most appropriate for meeting more than just local needs:

- Option 1: *Leeds should plan for managing its own waste only*
- Option 2: *Leeds should work with neighbouring authorities and other regional partners to ensure a strategic approach to managing waste*
- Option 3: *As part of its City Region role, should Leeds be considered as a strategic location, capable of serving a wider catchment.*

Findings indicate that **Option 2: Leeds should work with neighbouring authorities and other regional partners to ensure a strategic approach to managing waste** is the favoured approach to plan for future waste. 62.26% said ‘yes’ to this option (see Figure 11).

Respondents' Favoured Options for Planning for Future Waste

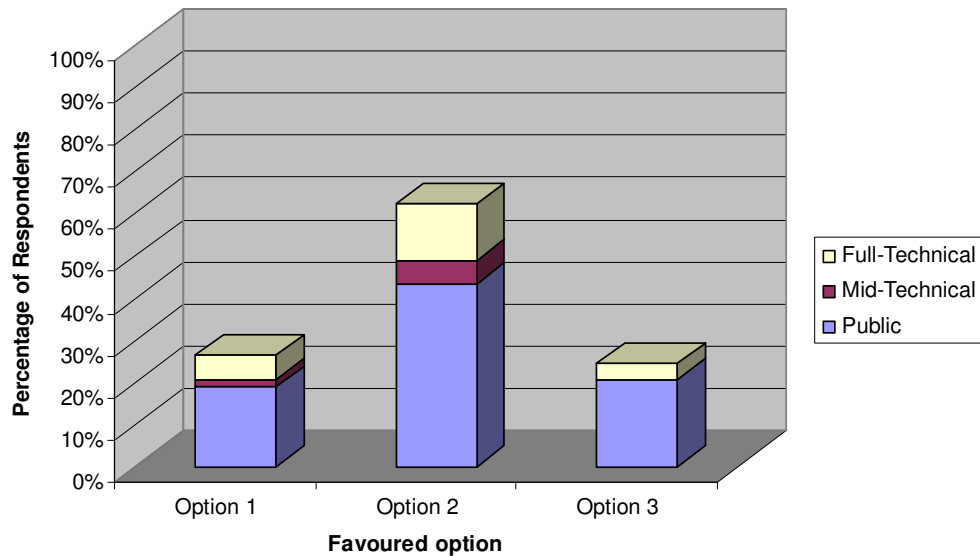


Figure 11 Respondents' Favoured Options for planning for future waste

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “The DPD should be developed in partnership with surrounding Local Authorities. They will have to handle issues of common concern in their core strategy”.
- “A combined approach may provide wider opportunities and minimise costs”
- “In the long term, waste management will be a national strategic problem. The more cities and towns establish common facilities then the easier it will be to influence national strategy”

Issue 5: Landfill Provision

Leeds aspires to ‘zero waste’, however during the transition to this there is a potential need for additional landfill provision for waste that cannot be re-used, recycled or recovered. Stakeholders were asked which of the following options is best:

- Option 1: *If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits*
- Option 2: *Make provision for additional locations for landfill*
- Option 3: *Rely on landfill provision outside Leeds*

Findings indicate that **Option 1: If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits** is the favoured approach to landfill provision. 71.70% of respondents said 'yes' and as little as 1.89% said 'no' to this option. If extensions to existing sites and backfilling of former mineral deposits are not possible then respondents thought **Option 2: Make provision for additional locations for landfill** to be the best option rather than rely on provision outside of Leeds (see Figure 12).

Respondents' Favoured Options for Planning for Landfill Provision

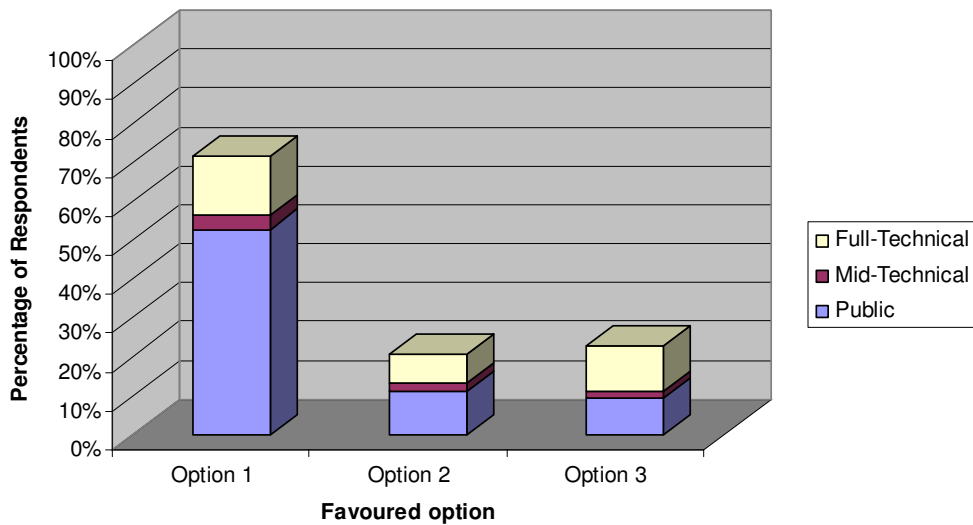


Figure 12 Respondents' Favoured Options for Landfill Provision

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “Restricting ourselves to existing landfill and former mineral deposits will concentrate and focus us on recycling waste. 20% by 2010 is achievable”
- “Waste generated by Leeds should be tackled by Leeds. Authorities on our boundaries will refuse our waste”
- “Landfill could be reduced rapidly and the need for extra sites removed if the council is proactive, efficient and innovative. If landfill is necessary it should be contained within existing sites to limit environmental impact”

Issue 6: Increasing and Encouraging Re-use, Recycling and Composting

Stakeholders were asked which if the following options would be most suitable for increasing the existing network of household waste sorting sites to meet recycling targets:

- Option 1: *The Council should focus on supporting and encouraging the further development of household waste sorting sites which are strategically located to serve different parts of the City*
- Option 2: *Strategic household waste sorting sites should be complimented by a broader network of smaller local bring facilities which may also include a wider choice of recycling and re-use opportunities*
- Option 3: *The Council should also provide policies which seek to encourage all developers to provide appropriate re-use and recycling opportunities when considering development proposals before, during and after construction.*

Of the three options, the majority of respondents favoured **Option 3: The Council should also provide policies which seek to encourage all developers to provide appropriate re-use and recycling opportunities when considering development proposals before, during and after construction** (see Figure 13). Some respondents ticked all three boxes, as demonstrated by the relatively high number of 'yes' responses for each option. One stakeholder commented: "This question is poorly worded as option 3 could be a means to achieving option 2 and therefore ticking only one box doesn't make sense and all 3 options are not mutually exclusive. In practice the problem means that all 3 need to be implemented".

Respondents' Favoured Options for Planning for Increasing and Encouraging Re-Use, Recycling and Composting

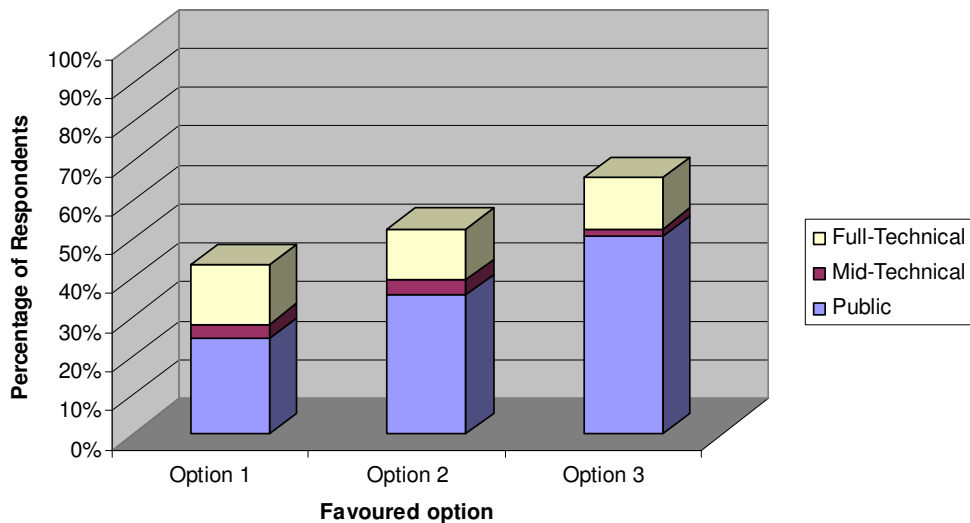


Figure 13 Respondents' Favoured Options for Increasing and Encouraging Re-use, Recycling and Composting

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “To ensure developers take some of the responsibility for their planned activities and the effect on the environment.”
- “All of the above options should be deployed to increase reuse and recycling rates. The City Council needs to be much more ambitious in setting its targets. By setting higher targets, the city can raise its game to the levels achieved by the best performing authorities in the country. The aspiration of zero waste must be backed up by a robust target, strong measures to achieve that target and effective delivery of those measures.”

3.5.2 Minerals and Aggregates

Issue 9: Sand and Gravel

Stakeholders were asked:

If it is necessary to quarry additional sand and gravel resources over the plan period would the sustainable provision of additional resources be best achieved by:

- Option 1: *The use of extensions to existing quarries to supply the bulk of the required resources*

- Option 2: *The release of new sites to supply the majority of this need*
- Option 3: *Using existing allocations and a criteria based policy approach without identifying new sites for development.*

Findings indicate that **Option 1: *The use of extensions to existing quarries to supply the bulk of the required resources*** is the favoured option for sand and gravel; 49.06% of respondents said 'yes' to this option. 37.74% of respondents also agree with **Option 3: *Using existing allocations and a criteria based policy approach without identifying new sites for development*** (see Figure 14).

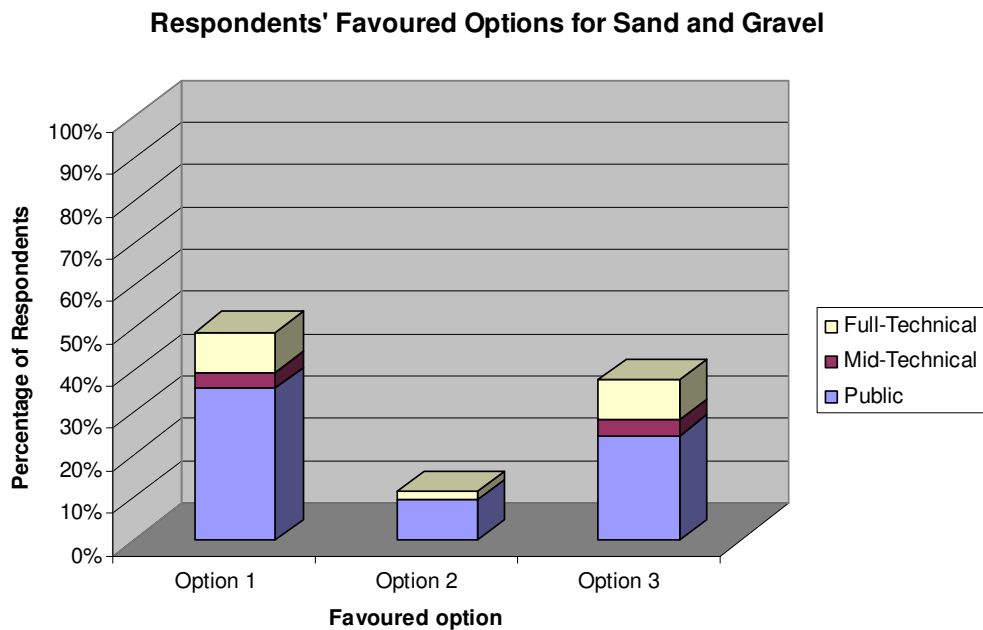


Figure 14 Respondents' Favoured Options for Sand and Gravel

Issue 16: Recycled Materials

There is a need to meet regional targets for recycling materials to use as aggregates and to encourage recycling facilities. Stakeholders were asked which of the following statements is most appropriate regarding the preferred locations of aggregate recycling facilities:

- Option 1: *Existing mineral sites, especially those that import construction and demolition and excavation wastes*
- Option 2: *Former mineral workings with suitable hardstanding areas*

- Option 3: *Appropriate industrial estate locations that are close to main sources of construction and demolition and excavation waste arisings.*
- Option 4: *Continue to encourage recycling initiatives generally, but provide a policy that sets out criteria for assessing the location of facilities*

Findings indicate that the majority of respondents (49.06%) said yes to **Option 1: Existing mineral sites, especially those that import construction and demolition and excavation wastes** are preferred locations for aggregate recycling facilities. However, a relatively high number also favoured **Option 4: Continue to encourage recycling initiatives generally, but provide a policy that sets out criteria for assessing the location of facilities** (39.62%) and the use of **Option 3: Appropriate industrial estate locations that are close to main sources of construction and demolition and excavation waste arisings** (37.74%) (see Figure 15).

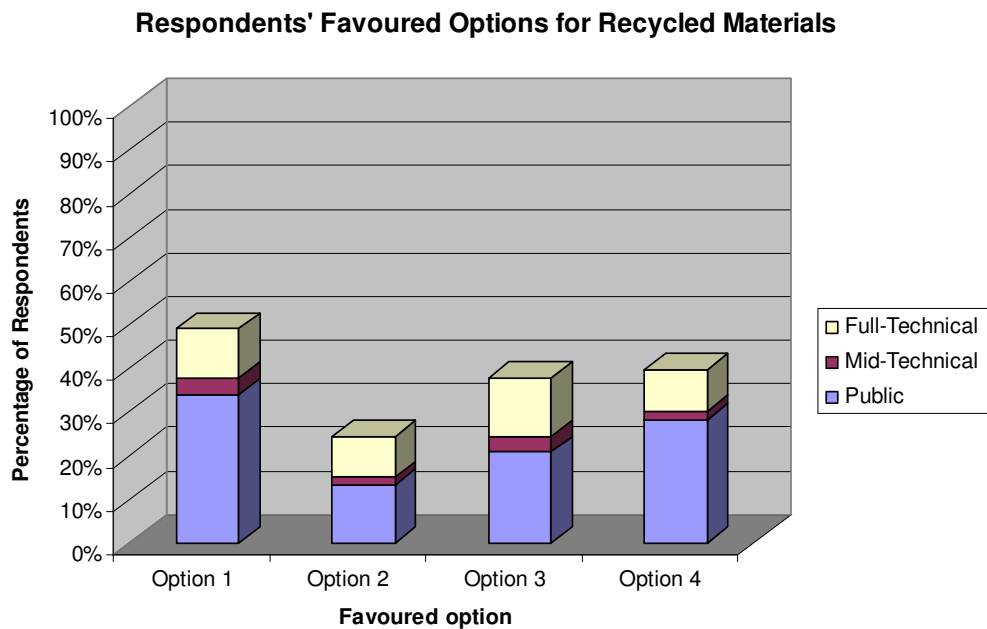


Figure 15 Respondents' Favoured Options for Recycled Materials

Issue 18: After Use

Stakeholders were asked to rank the following options in order of preference for the restoration and after use of mineral sites, with particular regard for landscape character and distinctiveness:

- Option 1: *A priority for the promotion of biodiversity*
- Option 2: *A priority for establishing woodland areas*
- Option 3: *A priority for the protection of valuable soil resources*
- Option 4: *A priority for leisure and recreation after-uses*
- Option 5: *To provide guidance on other possible after-uses*
- Option 6: *Other open uses*
- Option 7: *All of the above*

The majority of respondents agreed that **Option 1: biodiversity** and **Option 2 woodland areas** should be the priority for the after use of mineral extraction sites. Ten respondents (18.87%) ranked **Option 7 – All of the above** as their favoured option (see Figure 16).

Options for After-Use of Minerals Sites Ranked in order of Importance

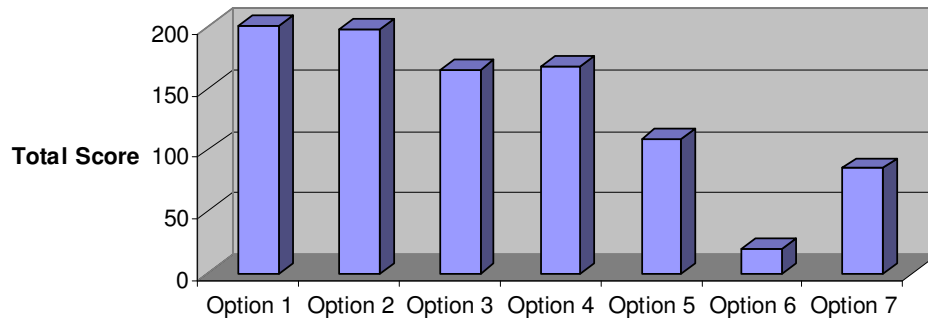


Figure 16 Options for After-Use of Minerals Sites Ranked in order of Importance

The following are examples of comments made by questionnaire respondents made about options for After Use (the full set of comments is detailed in Appendix F):

- “Option 7: Provide functional spaces for people (leisure, recreation, food growing, green infrastructure) and wildlife (habitat, woodland, soil). Green Infrastructure is multi-functional and provides services for people and wildlife there is no need to rank the options if a holistic approach to after use is taken.”

3.5.3 Land Use

Issue 31: Contaminated Land

Stakeholders were asked:

In order to encourage regeneration and development of land that is contaminated should the Council offer incentives for developments? These could include an agreement to prioritise applications for development on contaminated sites, or fewer planning obligations.

Findings indicate that the majority respondents, 64.15%, agree that **‘In order to encourage regeneration and development of land that is contaminated should the Council offer incentives for developments’** (see Figure 17). However some technical respondents were undecided on this issue and expressed concern that the removal of the appropriate planning obligations should be avoided these are put in place to reduce their negative impacts of development.

In order to encourage regeneration and development of land that is contaminated should the Council offer incentives for developments?

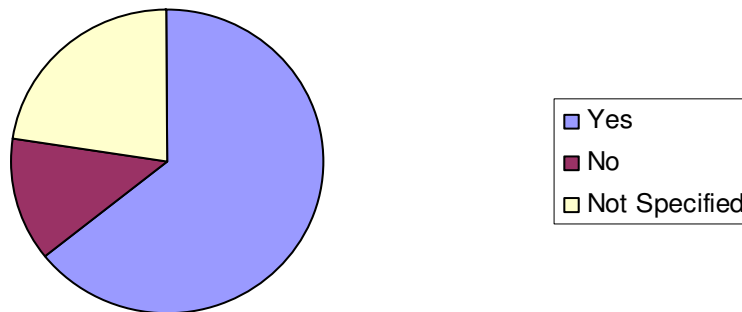


Figure 17 *Percentage of Respondents’ who favoured incentives for development on contaminated land*

The following are examples of comments made by questionnaire respondents who were in favour of this issue (the full set of comments is detailed in Appendix F):

- “But normal planning requirements should be met, and impact on neighbouring communities should be a consideration”
- “Land owners should decontaminate within a reasonable time”
- “Provided that the incentives are tightly controlled and openly informed”

- “Each case should be on its own merits. Compromises on environment of quality of development should not be made just to solve existing problem.”

3.5.4 Energy and Climate Change

Issue 20: Primary Energy Sources

Stakeholders were asked to rank in order of preference the following options to reduce reliance on fossil fuels, and reduce carbon dioxide and other greenhouse gas emissions whilst still meeting Leeds’ energy requirements:

- Option 1: *Plan for and invest in renewable energy sources as a major provider for the city?*
- Option 2: *Plan for and invest in Combined Heat and Power (CHP) and district heating as a major provider for the city?*
- Option 3: *Plan for and invest in other energy sources as a major provider for the City?*
- Option 4: *Continue to rely on fossil fuels energy production (this would potentially result in penalties for the City if emissions reduction targets are not met)?*
- Option 5: *A combination of the above?*

Option 1: *Plan for and invest in renewable energy sources as a major provider for the city* was given the highest overall rank by respondents. This was closely followed by **Option 2: *Plan for and invest in Combined Heat and Power (CHP) and district heating as a major provider for the city.*** 5 (9.43%) respondents ranked **Option 5: *A combination of the above*** as their favoured choice (see Figure 18).

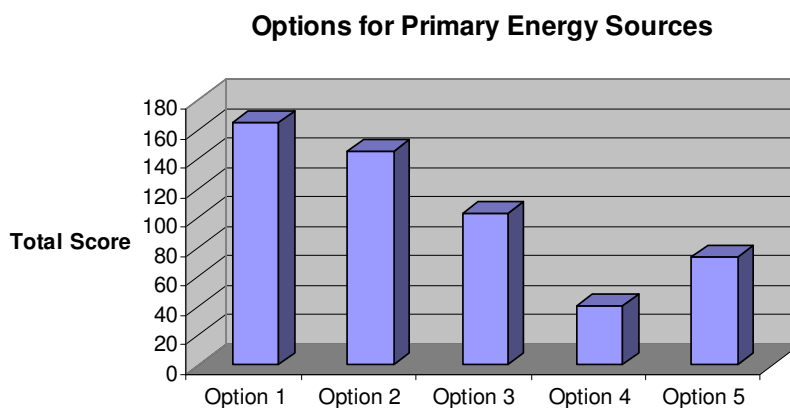


Figure 18 Options for Primary Energy Sources

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “There are opportunities to tackle climate change through a mixture of energy efficiency and deployment of renewable energy. The Stern Report highlighted that failing to act on climate change would be far more economically damaging than taking action. We need to act to vastly increase our proportion of energy generated from renewable sources and Leeds must play its part in doing this.”
- “A combination of wind, micro hydro, solar PV, solar heating, ground source heat pumps, geothermal energy (if applicable), biomass (sustainable managed/ waste biomass) and other renewable technologies. Decentralised energy production and transmission (on site micro-generation and CHP schemes), large scale generation as appropriate”.

Issue 22: Renewable Energy Technology

Stakeholders were asked which types of renewable energy technologies they consider worthwhile promoting in Leeds for larger scale energy production:

- Option 1: *Wind Turbines*
- Option 2: *Solar Power*
- Option 3: *Geothermal Technology*
- Option 4: *Energy Reclamation from Waste*
- Option 5: *Landfill Gas*
- Option 6: *Biomass*
- Option 7: *Hydropower*

It is evident that respondents support the use of renewable energy technologies. **Option 2: Solar Power** and **Option 4: Energy Reclamation from Waste** are the favoured options for renewable energy technologies. **Option 1: Wind Turbines** are deemed the least appropriate option of renewable technology (see Figure 19).

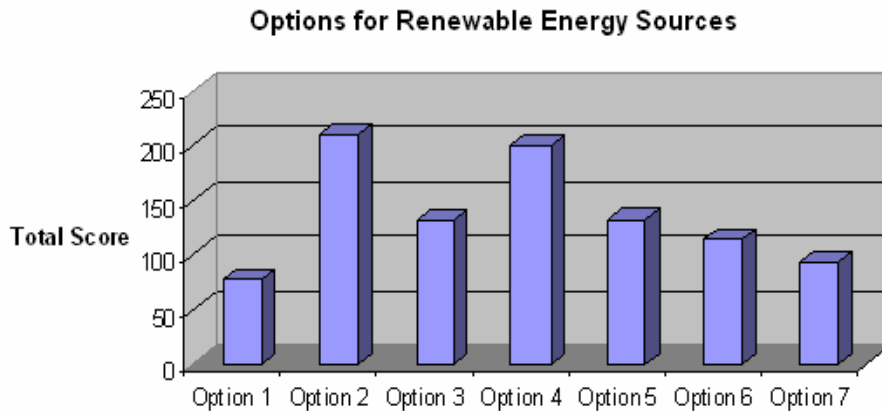


Figure 19 Options for Renewable Energy Sources

The following are examples of comments made by questionnaire respondents made in reference to the various options (the full set of comments is detailed in Appendix F):

- “There is enormous potential to reclaim energy from waste in Leeds and this is achievable and should be planned for in the LDF”.
- “Energy from waste incineration should not be classified as a renewable energy as it requires the input of waste which could otherwise be recycled saving large quantities of energy. It should not be counted as an option towards the energy mix for Leeds.”
- “The problem of climate change is so acute that we need to embrace the sources of renewable energy that have a proven track record of delivering energy and that are most suitable for the area. Wind energy can be utilised with great effect in some areas of Leeds. Solar power (both water heating and photovoltaic energy) should be deployed more widely particularly on larger developments. Hydropower can be deployed on the area’s rivers e.g. Wharfe and Aire valleys to provide small scale community schemes.”

Issue 23: Renewable Energy Technologies

Planning authorities should only allocate specific sites for renewable energy where a developer has already indicated an interest in the site, confirmed that it is viable, and that it will be brought forward during the plan period. However, research and consultation can be used to identify search areas and where negative effects will be minimal or can be addressed. Stakeholders were asked whether they agreed with the following options:

- Option 1: *Research and consultation to be undertaken to provide spatial guidance in the NRWDPD on locations that are suitable for a particular type of renewable energy development*
- Option 2: *Policies to support renewable developments should be based solely on meeting specified criteria*
- Option 3: *The NRWDPD should contain a mixture of spatial guidance and criteria based policies.*

Respondents did not decide on one option regarding the location of renewable energy developments. Slightly more respondents (56.60%) said 'yes' to **Option 1: *Research and consultation to be undertaken to provide spatial guidance in the NRWDPD on locations that are suitable for a particular type of renewable energy development.*** 49.06% said 'yes' to **Option 2: *Policies to support renewable developments should be based solely on meeting specified criteria*** and 47.17% said 'yes' to **Option 3: *The NRWDPD should contain a mixture of spatial guidance and criteria based policies*** (see Figure 20).

Respondents' Favoured Options for Renewable Energy Technologies

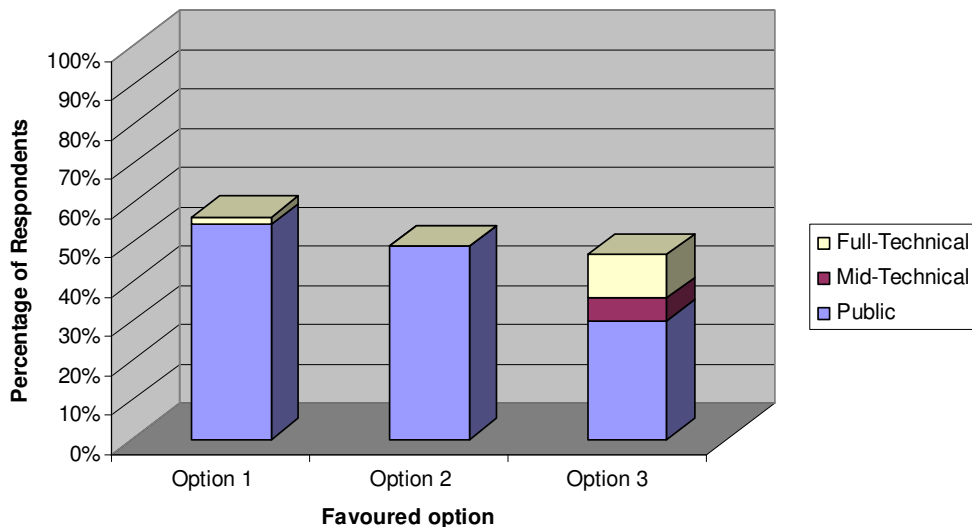


Figure 20 Respondents' Favoured Options for Renewable Energy Technologies

Issues 26: Micro-generation

Leeds City Council can formulate policies that both promote the use of micro-generated renewable technologies and require new developments to incorporate these technologies wherever possible. Stakeholders were asked whether they agreed with the following options:

- Option 1: Agree with this approach and think this should be considered as a policy for all types of development in the NRWDPD?
- Option 2: Agree with this approach but think that the other DPDs to be prepared should each consider this issue separately in relation to the different types of development (e.g. housing, employment, retail) as there may be alternative solutions?
- Option 3: Disagree with this approach and think that policies on micro-renewables should not be included? (The full-technical questionnaire did not give this option.)

The majority of respondents (54.72%) agree with **Option 1: the Council should formulate policies that both promote the use of micro-generated renewable technologies for all types of development in the NRWDPD** (see Figure 21).

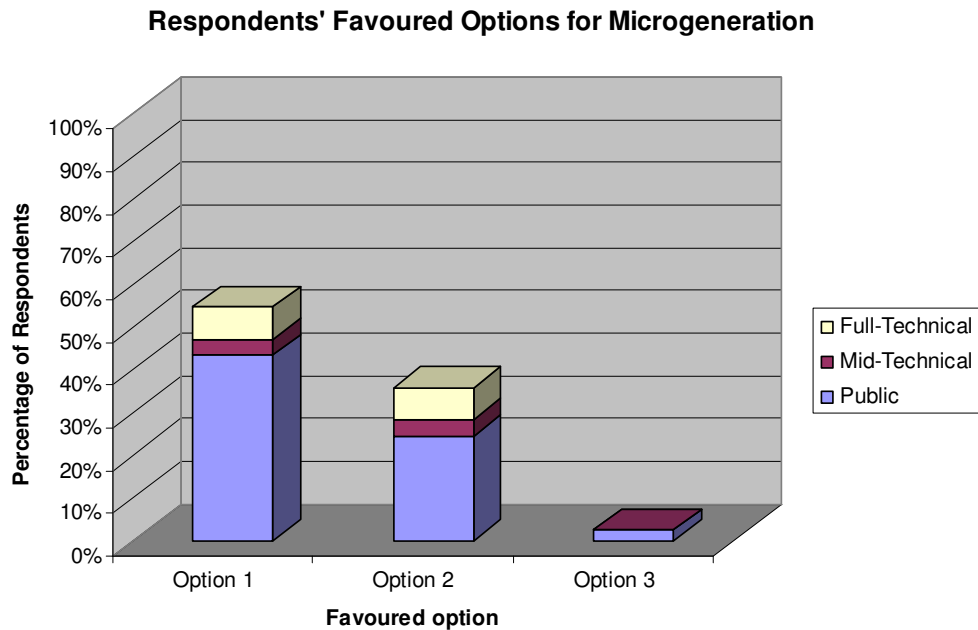


Figure 21 Respondents' Favoured Options for Microgeneration

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “Microgeneration should be required for developments above a certain size. This should apply across all types of development and inclusion in the NRWDPD will ensure an integrated approach to this aim.”

3.5.5 Water Resources

Issue 32: Water Quality

The development and remediation of brownfield sites (particularly contaminated sites) close to water resources could help improve local water quality but will need to be carefully managed and monitored to avoid adverse impacts. Stakeholders were asked which of the following options are appropriate:

- Option 1: *Define sensitive areas where development will not be allowed adjacent to water resources*
- Option 2: *Provide criteria stating that development must demonstrate that there will be no impact on water quality*

- Option 3: *Provide criteria stating that development must improve the water quality of any adjacent water resources, which are of poor quality* (The full-technical questionnaire did not give this option.)

Several respondents selected all three options as an appropriate approach to improve local water quality where brownfield site development is close to water resources; 55% agree with **Option 3: Provide criteria stating that development must improve the water quality of any adjacent water resources, which are of poor quality** (The full-technical questionnaire did not give this option); 52.83% agree with **Option 2: Provide criteria stating that development must demonstrate that there will be no impact on water quality**; and 43.30% agree with **Option 1: Define sensitive areas where development will not be allowed adjacent to water resources** (see Figure 22).

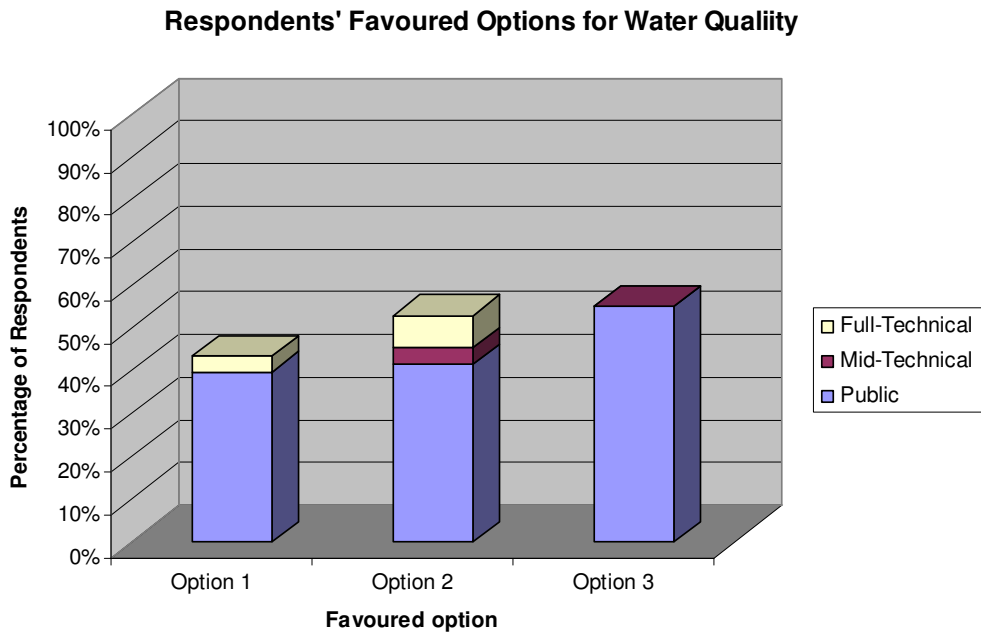


Figure 22 Respondents' Favoured Options for Water Quality

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “All waterside development (except infrastructure that NEEDS to be directly adjacent to a waterway e.g. boating infrastructure, canal freight infrastructure)

should include a buffer zone because the waterways should provide green infrastructure in the form of wildlife corridors and linear parks with walking and cycling infrastructure, native and edible plants and good biodiversity.”

- “Is this not already government policy?”

Issue 33: Drainage

The flooding which occurred in Leeds in the summer of 2007 was largely as a result of existing inadequate drainage capacity. Increased surface water run-off is largely attributable to the development of impermeable hard surfaces, which in many cases are constructed by householders. Planning permission is not necessary; hard surfaces can be constructed using “permitted development” rights. Stakeholders were asked which of the following options were appropriate:

- Option 1: *Remove permitted development rights across the Leeds City area for development using impermeable surfaces*
- Option 2: *Identify the areas of drainage stress and remove permitted development rights for development using impermeable surfaces within these areas only?*

Findings indicate that there is little difference in the response to the two options. Slightly more, 49.06% compared with 33.95%, favour **Option 1: *Remove permitted development rights across the Leeds City area for development using impermeable surfaces*** over **Option 2: *Identify the areas of drainage stress and remove permitted development rights for development using impermeable surfaces within these areas only*** (see Figure 23).

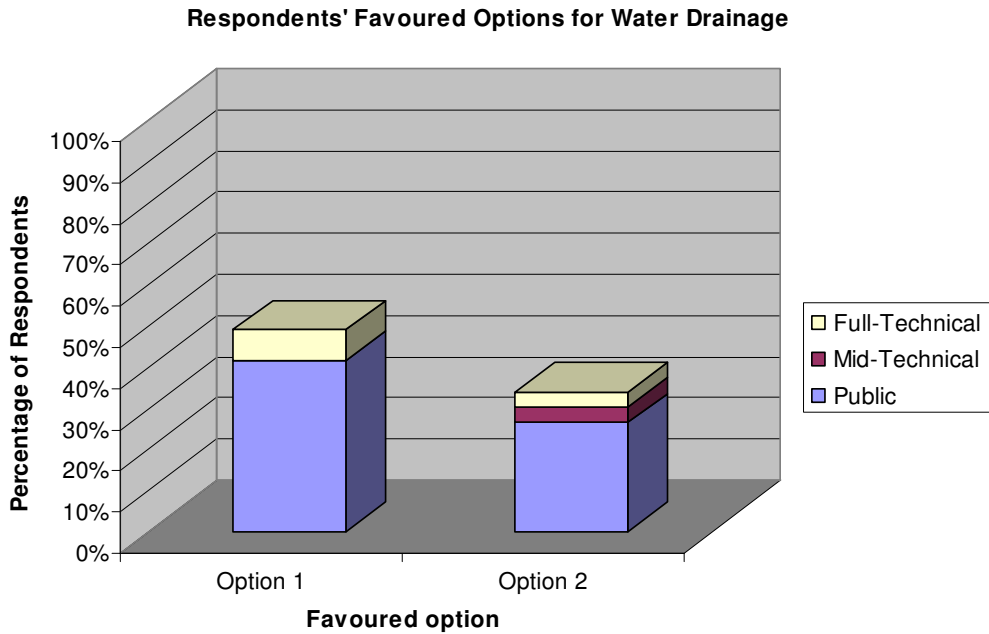


Figure 23 Respondents' Favoured Options for Drainage

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “People need to be prevented from paving their gardens – it’s bad for floods, urban heat island effect, and disastrous for urban wildlife”.

3.5.6 Air Quality

Issue 36: Air Quality - Improvement

Stakeholders were asked whether they agreed that the primary cause of air pollution and reduction in quality is a result of transport emissions?

The 49.06% of respondents who agreed were offered the following options:

- Option 1: *The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed in the Transport DPD*
- Option 2: *Issues of air quality improvement should be solely addressed in the Transport DPD*
- Option 3: *Issues of air quality improvement should be addressed in other DPDs on Transport, Housing, and Employment and Retail (given that air pollution is also caused by carbon emissions from development).*

Findings indicate respondents favour **Option 3: Issues of air quality improvement should be addressed in other DPDs on Transport, Housing, and Employment and Retail (given that air pollution is also caused by carbon emissions from development, 50.94% of respondents agree with this option. Option 1: The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed within the Transport DPD** was favoured by 37.74% of respondents (see Figure 24).

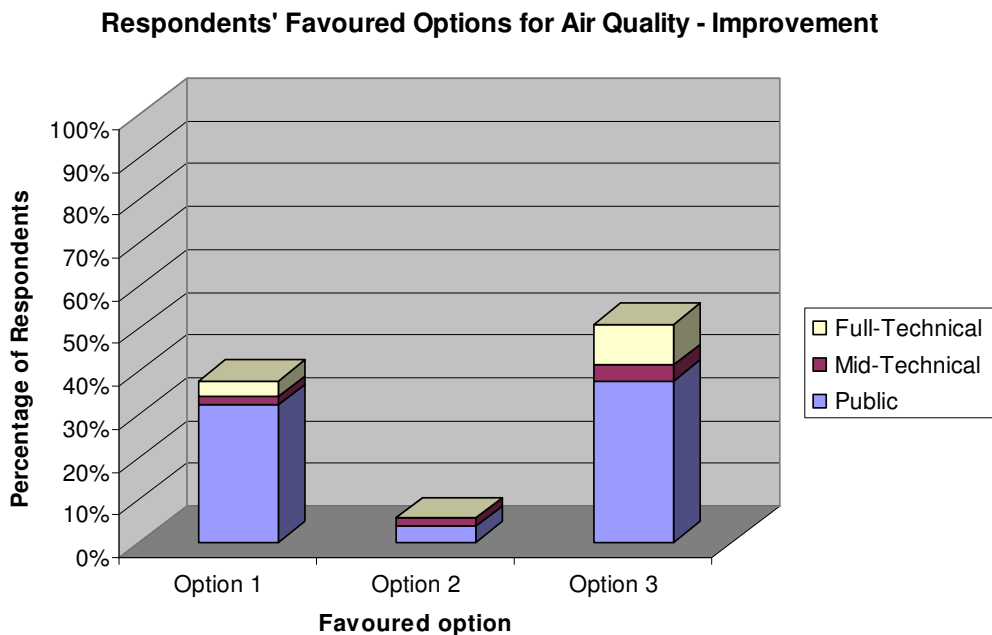


Figure 24 Respondents' Favoured Options for Air Quality – Improvement

The 24.53% of respondents who disagreed that transport emissions were the main contributor to air pollution gave the following sources as the main cause:

- “The situation is more complex, local point sources are very significant in certain locations these need to be tackled as well, also it is the mixing of pollutants which has been very significant. Construction is a major factor in central Leeds”
- “Cars, industry and domestic sources all play an equal part in our air pollution”
- “Not known - requires a technical investigation to determine sources”

3.5.7 Sustainability

Issue 39: Site Accessibility – Waste and Minerals

Stakeholders were asked which of the following options they preferred regarding the use of alternative forms of transport for accessing major waste and minerals facilities in a sustainable manner:

- Option 1: *Continue to rely on road transport as the main mode of minerals and waste transfer as this retains flexibility.*
- Option 2: *Are additional facilities such as rail borne depots or wharfs which support water transport required, thereby reducing the need for road transport, and if so, should broad locations which would support the shared facilities for minerals and waste and other materials be identified?*

Findings indicate respondents favour **Option 2: additional facilities such as rail borne depots or wharfs which support water transport required, thereby reducing the need for road transport and broad locations which support the shared facilities for minerals and waste and other materials be identified.** 56.25% of respondents agree with this approach (see Figure 25).

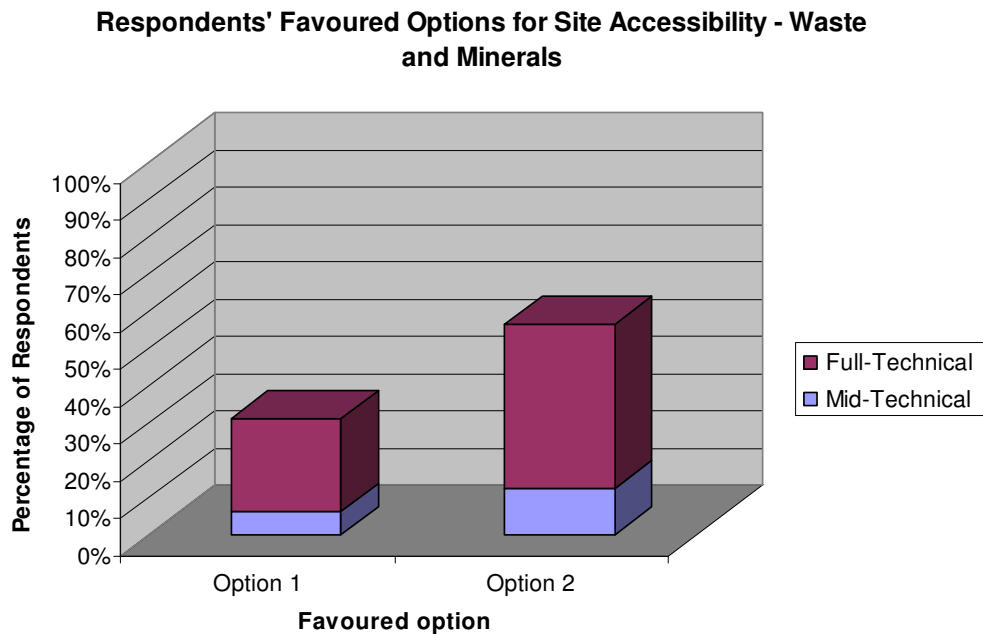


Figure 25 Respondents' Favoured Options for Site Accessibility – Waste and Minerals

The following are examples of comments made by questionnaire respondents made in reference to the favoured option (the full set of comments is detailed in Appendix F):

- “Wastes particularly still need to be collected by road from residential and commercial properties and transported by road to transfer stations and material recovery facilities, this is unavoidable. Strategic locations for waste management facilities are the answer. Rail borne depots or wharfs would be part of the strategic network where they are feasible and deliverable at a reasonable cost.”
- “Modal shift away from road transport is highly desirable for freight due to greater potential economies of scale leading to lower emissions. We recognise that there will still be a need for some road-based transport but would want to see policies which maximized the use of other forms of transport.”
- “The waterways can be a low carbon, low pollution way of moving freight including waste and minerals (need to ensure the wildlife and recreational value of the waterways is not too adversely affected).”

3.6 Targeted Consultation

Table 6 summarises additional consultation activities that have taken place as part of the Issues and Alternative Options consultation.



Consultee	Summary of Consultation Activity
 <p>Leeds Voice Environment Forum</p> <p>Leeds Voice exist to represent and strengthen the voluntary, community and faith sector and aim to provide a communication network on environmental issues in Leeds.</p>	<ul style="list-style-type: none"> • Leeds Voice were included in original stakeholder communication and invited to the workshop. • Leeds Voice requested Jacobs project team attend their June meeting to give additional information via a presentation and Q&A session; this formed the basis for the Leeds Voice formal consultation response • <i>“The NRWDPD is a document that Leeds Voice should positively support and use to fulfil its vision of a one planet city”</i> (Leeds Voice member)
 <p>Cairn Bardon Ltd and Aggregate Industries Ltd</p> <p>Aggregate Industries is an international construction and building materials company; they will play a major role in the use of natural resources in Leeds in the future and are therefore a key stakeholder.</p>	<ul style="list-style-type: none"> • Aggregate Industries were included in original stakeholder communication and invited to the workshop, but were unable to respond in time due to resource and time constraints in the company; they requested a separate meeting. • Two members of the Jacobs project team (including the Minerals and Aggregates technical expert) visited Aggregate Industries site. • Aggregate Industries were given extra time to formalise the outcome of meeting for inclusion in the consultation.

Table 6 Summary of additional targeted consultation activities

4 Conclusion of Responses

4.1 General Responses

Issue 1: Key themes

There was overall agreement that all the key themes were an important part of the NRWDPD. Of the six key themes, Waste was ranked as the most important and Minerals and Aggregates as least. The GOYH were not convinced at this stage that the progression of non-waste issues ahead of the Core Strategy was appropriate, however consultation with this office is an ongoing activity in the DPD process³. The Coal Authority thinks the NRWDPD should only focus on Waste, Minerals and Aggregates and that the other four themes are strategic and therefore contained in the Core Strategy. English Heritage agree with the six themes but feel that the minimisation of potentially adverse environmental impact arising from plans need to be explicitly stated for each issue.

Stakeholders identified that the following issues should be taken into consideration either within or in addition to the six key themes: Permaculture, Solar Power, Packaging, Noise and Light Pollution, Land Use Food Supply, Soil Preservation, and Biodiversity.

4.2 Waste

2: Planning for Future Waste Management

The majority of stakeholders, including the Environment Agency and Questionnaire Respondents (62.26%), thought that Leeds should work with neighbouring authorities and other regional partners to ensure a strategic approach to managing waste (Option 2). However, Leeds Environmental Waste Forum suggests that Leeds' first priority should be to manage its own waste (Option 1), so waste management is done in the most sustainable manner. Regardless of whether the Council work alone or with neighbouring authorities Natural England, Leeds Environmental Waste Forum and Friends of the Earth wish for waste to be dealt with as close to the source as possible.

³ Consultation with the GOYH is ongoing and changes in their position will be reflected in the reporting of the next consultation period.

3: Strategic Location of New Waste Management and Transfer Facilities

The majority of stakeholders, including the Environment Agency, Leeds Voice Environmental Forum and Questionnaire Respondents (48.08%), agree that the Council should identify a number of alternative sites distributed around the City to provide a more extensive range of options to serve the needs of all waste streams (Option 2). Although the Highways Agency are in support of Option 2 they highlight that this strategy will mean that each of the sites may only be able to process a single waste stream, resulting in waste having to be moved further to an appropriate site. Friends of the Earth disagree with additional waste management facilities and comment that sites need to be co-located in order to be as resource efficient as possible.

5: Landfill provision

If additional landfill provision is required, to provide residual waste that cannot be re-used, recycled or recovered, then stakeholders think that the council should only identify extensions to existing landfill sites and backfilling of former minerals deposits. The Environment Agency, Lafarge Aggregates and Questionnaire Respondents (71.7%) all agree with this option. However, the Environment Agency point out that landfill should be as a last resort and, if possible, extensions to landfill and backfilling of former mineral deposits should be considered. The GOYH do not agree with this option and argue that it is questionable whether Leeds actually needs more landfill sites.

6: Increasing and Encouraging Re-use, Recycling and Composting

Stakeholders identified that the three options are not mutually exclusive. The majority of stakeholders agree that the strategic household waste sorting sites should be complimented by a broader network of small bring facilities, which may include a wider choice of recycling and re-use opportunities (Option 2) and in addition the Council should also provide policies which seek to encourage all developers to provide appropriate re-use and recycling opportunities when considering development proposals before, during and after construction (Option 3). The Environment Agency supports both these options and comment that incorporating effective waste management at the design stage is key to ensure that there is as little waste as possible. The General Public at Supermarket Exhibitions and Questionnaire Responses indicate that the public support an increase in recycling facilities across the City. English Heritage, Friends of the Earth and South Healingly Community Association are in agreement that the Council's main concern should be reducing the

amount of waste produced and promoting re-use and recycling. Both English Heritage and Leeds Voice Environmental Forum argue that the majority for Leeds' waste arises from the construction and demolition of buildings, therefore existing building structures should be redeveloped and the building of new structures should be avoided.

4.3 Minerals and Aggregates

9: Sand and Gravel

49.06% Questionnaire Respondents agree that if it is necessary to quarry additional sand and gravel resources over the plan period then extensions to existing quarries to supply the bulk of the required resources would be the most sustainable option. However, 37.74% of Questionnaire Respondents, GOYH and Leeds Voice Environmental Forum comment that Leeds has a major need for sand and gravel and reserves need to be identified, thus a criteria based approach for existing allocations should be used. Cairn Bardon Ltd and Aggregate Industries Ltd suggest that a proper analysis of geology is necessary before making any plans and taking British Geological Survey data is not comprehensive enough.

16: Recycled Materials

The majority of stakeholders argue that existing mineral sites, especially those that import construction and demolition and excavation wastes arisings, would be a preferred location for aggregate recycling facilities (Option 1). GOYH state that Leeds need to be more proactive about this issue, and the Environment Agency support the recycling and reuse of aggregates. Lafarge Aggregates say that all the suggested options are generally acceptable however if appropriate industrial estate locations are promoted then these need to be a generally large (0.5ha) level site with good access.

18: After Use

The majority of Stakeholders were in favour of an approach that prioritises the restoration and after-use of mineral sites for the promotion of biodiversity (Option 1) and woodland establishment (Option 2). Both Natural England, Leeds Voice Environmental Forum argue that Leeds' green infrastructure should be promoted and should be functional for wildlife and people. Natural England goes onto comment that the promotion of biodiversity will help the Council meet the targets set out in the Leeds Biodiversity Action Plan. The Coal Authority, Lafarge Aggregates and certain members of the public state that site specific circumstances need to be taken into consideration when allocating an after use. Members of the public reiterate this

comment. British Waterways favour new facilities which will encourage and aid tourism on inland waterways, old mineral sites and quarries. These can be used for mooring or other boating uses.

4.4 Land Use

131: Contaminated Land

The majority of stakeholders agree that the council should offer incentives to encourage regeneration and development of land that is contaminated. The Environment Agency and the majority of Questionnaire Respondents (64.15%) support this option, providing that the clean up of contaminated land does not cause harm to the environment or society. However, some External Stakeholders and Technical-Questionnaire Respondents were undecided on this issue and expressed concern that the removal of the appropriate planning obligations should be avoided as these are put in place to ensure developments reduce their negative impacts and impact more positively on surrounding communities.

4.5 Energy and Climate Change

20: Primary Energy Sources

The majority of stakeholders agree that Leeds' should plan for and invest in renewable energy sources as a major provider for the city. Natural England, Leeds Voice Environmental Forum, Friends of the Earth, Coalpro and the majority of Questionnaire Respondents (ranked the option highest) all agree that renewable energy sources will achieve greater efficiencies. All recognise that realistically this cannot be an immediate switch and a combination of sources will be required in the short and mid-term. Natural England welcome Capture and Storage Technology (CCS) for the mid term but not as a substitute for renewable energy, as CCS depletes finite resources. The South Headingley Community Association and the general public encourage the exploration of possibilities into producing energy at the household level.

21: Oil and Gas

The majority of questionnaire respondents thought that in the absence of preferred locations for gas storage, there should be an additional policy designed to ensure the acceptability of any storage proposals that may come forward and incorporating measures to mitigate the potential environmental impacts of the proposed facility, in terms of both surface and sub surface works (Option 2) In relation to this option the

Environment Agency state gas storage facilities need to be located with protection of groundwater and surface water as key criteria. Further, Friends of the Earth state that policy regarding the storage of gas should be reviewed regularly as technologies are constantly being updated.

22: Renewable Energy Technology

The majority of stakeholders think that Solar Power (Option 2) is worthwhile and realistic to promote for larger scale energy production in Leeds. The second most popular choice from Questionnaire Respondents was Energy Reclamation from Waste (EfW – Option 4). However, Leeds Voice Environmental Forum suggest EfW may undermine the recycling of waste as it requires a minimum input to function, which may at some times require the use of recyclable waste to ensure the EfW can function. They comment that all the options should be promoted apart for Geothermal Energy. Friends of the Earth also state that EfW cannot be classed as a renewable energy source, nor should it be counted as an option towards the energy mix for Leeds. GOYH highlight that PPS22 allows Local Authorities to be unspecific in the technology in which they accept or reject. Natural England suggests that Leeds needs to promote a range of renewable energy generation possibilities.

23: Renewable Energy Technologies

Respondents to this question did not discriminate between technologies. The majority of Questionnaire Respondents agree that research and consultation should be undertaken to provide spatial guidance in the NRWDPD on locations that are suitable for a particular type of renewable energy development (Option 1). However, Full-Technical Questionnaire Respondents and Leeds Voice Environmental Forum favour a mixture of spatial and criteria based policies. Leeds Voice Environmental Forum suggests that developers should be obliged to utilise renewable energy within developments. Friends of the Earth point out that other sites need to be safeguarded in order to maximise the availability of renewable energy sites in the future.

26: Micro-generation

The majority of Stakeholders agree that the Council should formulate policies that both promote the use of micro-generated renewable technologies for all types of development in the NRWDPD (Option 1). Friends of the Earth commented that microgeneration should be required for all developments over a certain size; inclusion in the NRWDPD would ensure an integrated approach. However, GOYH comment that PPS22 is very clear on the need to support all technologies. They go onto note

that if microgeneration is made a permitted development then a policy will not be needed in the LDF.

4.6 Water Resources

32: Water Quality

Stakeholders recognised that the options are not mutually exclusive. The Environment Agency, Natural England and South Headingley Community Association agree that all of the options are acceptable. The majority of Public and Mid-Technical Questionnaire argue that a criterion stating that development must improve the water quality of any adjacent water resources, which are of poor quality is the best option to improve water quality. The Environment Agency offers support for his options and suggests that waterside developments should incorporate a 'buffer zone' to protect against pollution and provide green infrastructure. A Leeds City Council employee suggests that development should not affect the quality of rivers and catchments areas and that policy should be used to screen for pollution and adverse water quality impacts.

33: Drainage

The majority of stakeholders argue that permitted development rights should be removed across the Leeds City area for development using impermeable surfaces (Option 1). However, The Environment Agency and Yorkshire Forward both agree that studies of flooding and water cycles should also be undertaken to indicate what the real causes are before applying a blanket approach. This is supported by Friends of the Earth and Lafarge Aggregates who suggest that a full review and programme of maintenance and upgrading should be carried out on the drainage system. Sustainable Urban Drainage Systems (SUDS) and Green Roofs are two of the suggested methods for attenuating surface run-off.

4.7 Air Quality

36: Air Quality Improvement

Air pollution from transport is seen as a key contributor to Leeds' carbon footprint; however the majority of respondents recognise that this is not the only contributor. Those who agreed that the primary cause of air pollution and reduction in air quality is as a result of transport emissions felt that an overarching policy on air quality should be contained in this DPD but in addition specific issue policies should be

carried through to other relevant DPDs. This is backed by respondents such as the Environment Agency, Leeds Voice Environmental Forum and the general public.

4.8 Sustainability

39: Site Accessibility – Waste and Minerals

The majority of stakeholders support the use of additional facilities, such as rail borne depots or wharfs that support water transport, in order to reduce the need for road transport (Option 2). Natural England, Leeds Voice Environmental Forum, Friends of the Earth, The Coal Authority, The Highways Agency and the majority of Questionnaire Respondents (56.25%) agree with this option. Natural England and Leeds Voice Environmental Forum highlight that all low carbon modes need to be supported by this DPD. The Friends of the Earth recognise that there will still be a need for some road-based transport, however the Highways Agency comment that the strategic road network is already operating very close to capacity therefore alternative options for transportation must be considered to reduce the need for road transport.

5 Process Evaluation

Post-consultation evaluations have highlighted a number of areas for consideration at the next stage. The five evaluation categories in the following sections (see Figure 26) have been adapted from Cabinet Office⁴ and Audit Commission⁵ guidance, and were used to draw out the successes of our approach and also 'lessons learnt' to be improved on at the next stage of consultation. This evaluation stage is vital in showing stakeholders how their responses and feedback have been taken into account.

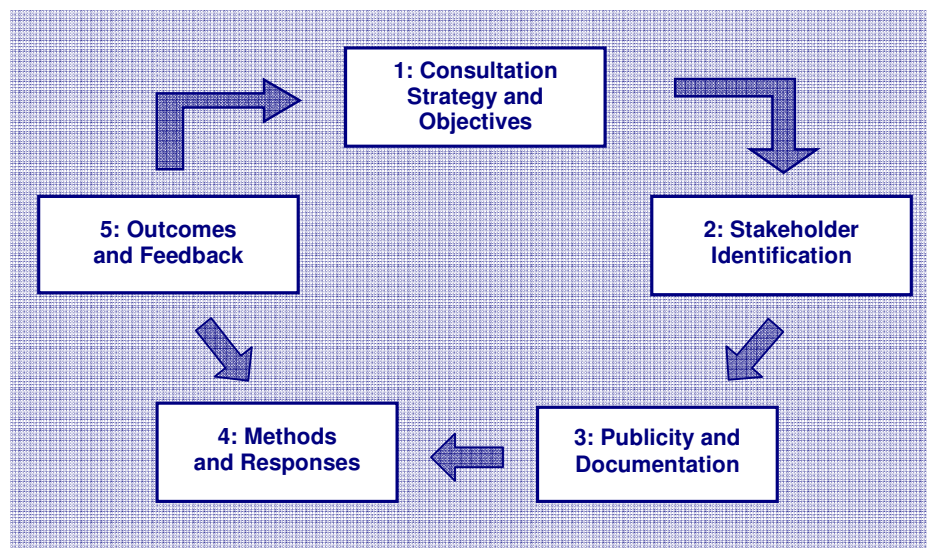
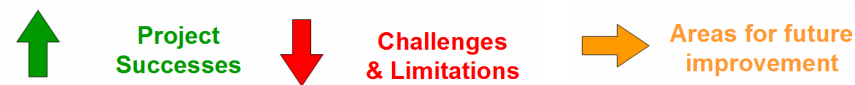


Figure 26 Categories for consultation evaluation

⁴ Cabinet office (1998) An Introductory Guide: How to consult your users, <http://archive.cabinetoffice.gov.uk/servicefirst/1998/guidance/users/4.htm>, accessed 18th August 2008.

⁵ Audit Commission (1999) Listen Up: Effective community consultation, <http://www.audit-commission.gov.uk/reports/AC-REPORT.asp?CategoryID=&ProdID=EA01768C-AA8E-4a2f-99DB-83BB58790E34&SectionID=sect28#>, accessed 18th August 2008.

5.1 Consultation Strategy and Objectives

All three objectives set out in the Consultation Strategy were met, and the SCI principles were adhered to. Further specific objectives should be set in line with original client expectations and agreed with the project team before the next stage of consultation.

5.2 Stakeholder Identification

Stakeholders were initially identified by the Jacobs project team and then cross-referenced with Leeds City Council's standard stakeholder database; the final stakeholder list was compiled from these two sources and used as the basis for all stakeholder communication. Subsequent additions occurred during further stakeholder identification exercises, via the 'snowball technique', whereby existing stakeholders suggest groups or individuals who may have an interest in being consulted.

Figure 27 presents a summary of the successes, challenges and areas for future improvement for the Stakeholder Identification stage of the NRWDPD.




 Successes	 Challenges	 Future Improvement
<ul style="list-style-type: none"> • Inclusive and wide ranging • Good categorisation (internal / external / public / statutory / hard-to-reach) • Successful public engagement 	<ul style="list-style-type: none"> • Due to the size of the project area it proved difficult to actively engage all community groups. 	<ul style="list-style-type: none"> • Opportunities to engage younger age groups

Figure 27 Evaluation summary table for '2: Stakeholder Identification'

Stakeholders were classified as 'internal' and 'external'; internal stakeholders – LCC officers and councillors – are vital to the everyday functioning of the Council and participate closely in the decision making processes, and external stakeholders – comprised of parish councillors, environmental organisations, NGOs, representatives

from the voluntary sector, and other non-Council organisations – can both affect and be affected by the actions of the Council.

The NRWDPD aimed to be inclusive from the start; to have a long list of peripheral stakeholders rather than a concise list which would risk excluding potentially important stakeholders at this early stage. Questionnaire response analysis revealed a lack of engagement with under 21 year olds, therefore (in line with emerging government legislation on the 'Duty to Involve') consultation with youth groups should be accounted for at the next stage. As suggested by one stakeholder:

“Primary schools would be a good way to reach and influence parents and Further Education establishments should be engaged. There is a need to consult lower down; schools are aware of what is best for Leeds”.

Unfortunately, the team did not have the opportunity, time or resources to go beyond the original project scope and engage hard-to-reach groups in a more 'drilled down' way (e.g. the groups identified through the Little London Community Centre). Engagement of hard-to-reach groups did take place effectively via piggybacking Leeds Voice existing meetings; Leeds Voice has links with youth groups and other seldom heard stakeholders in the area. As with all consultation processes and activities, a balance needs to be struck between the ideal consultation strategy, and limited time and staff resources.

5.3 Publicity and Documentation

A wide range of documentation was produced to inform stakeholders about issues covered, and to convey the import of their responses in shaping the future content of the NRWDPD. All documentation was available in electronic format on the Leeds City Council website, and also in paper format at Leeds Central Library and One Stop Shops. In order to ensure a widespread awareness within the Leeds population the consultation period was advertised through the media; a press release was produced through the publicity team at Leeds City Council, and adverts were placed in the Yorkshire Evening Post and local supplementary publications. Effective publicity and clear documentation are vital mechanisms for achieving the level of understanding and information provision necessary for making informed decisions.

Figure 28 presents a summary of the successes, challenges and areas for future improvement for the Publicity and Documentation stage of the NRWDPD.




 Successes	 Challenges	 Future Improvement
<ul style="list-style-type: none"> • Documents easily available in range of formats (paper and online) • Non-technical summaries provided • Press releases through LCC and newspaper adverts • Phone calls in addition to letters/email 	<ul style="list-style-type: none"> • Complaints received about questionnaire format – too complex • Stakeholders questioned the sustainability of long printed documents • Pages on LCC website hard to find 	<ul style="list-style-type: none"> • Clearly label all documentation as recycled • Provide less complex data capture methodologies • Improve LCC website information access

Figure 28 Evaluation summary table for '3: Publicity and Documentation'

The two main issues with regards to publicity and documentation was the need for better promotion of the consultation and less complex questionnaires. The project team will continue to work with LCC's publicity team and we suggest that future consultation should - where possible - explore opportunities to use local radio and TV as methods of communication. Several stakeholders and members of the public complained about the content and format of the questionnaires; even the public questionnaires (which were designed to simplify complex, technical issues into more understandable themes) were considered too complex and badly written. One member of the public commented:

“The shorter questionnaire is presumably an edited and simplified version of the longer one and various quirks in the way questions are presented indicates lapses in survey design or editing. Analysing responses to something as complex as a DPD consultation is a fearsome enough job as it is without introducing ambiguities and mismatches between the responses to the various questions”.

In response to this issue, future questionnaires should be:

- **Shorter** (perhaps a maximum of four questions per technical expert),
- **Comparable** (consistent approach across each version),

- **Less complex** (easier to understand; technical opinions should be gathered via a more suitable method).

Several stakeholders questioned the appropriateness of apparently non-recycled glossy paper for NRWDPD documentation; as a result of this one member of the public believed that Leeds City Council were simply *“going through the motions rather than showing any real commitment to waste reduction”*. Subsequent confirmation from the print office revealed all documentation was printed on recycled material but not explicitly labelled as such; environmental credentials should be visibly promoted in future.

5.4 Methods and Responses

The range of consultation methods used has been detailed in Table 1. Figure 29 presents a summary of the successes, challenges and areas for future improvement for the Methods and Responses stage of the NRWDPD.




 Successes	 Challenges	 Future Improvement
<ul style="list-style-type: none"> • Successful supermarket exhibitions: confirmed interest, technical experts present, took consultation to the community • Well planned stakeholder workshops: rescheduled originally, hot topic desk, post-it note approach • Extensive communication: all stakeholders telephoned 	<ul style="list-style-type: none"> • Disappointing response rates and poor workshop attendance • Non representative sample obtained in questionnaires • Some complaint about lack of consultation in certain wards • General lack of trust and confidence in Council – barrier to effective engagement 	<ul style="list-style-type: none"> • Aim to engage younger people (e.g. through youth groups) • Avoid supermarkets on Wednesdays, visit 1 day not 2, early/late shifts

Figure 29 Evaluation summary table for ‘4: Methods and Responses’

There are a number of ways to encourage participation at consultation events:

1. **‘Take the consultation to the people’**; talking to people at venues they already attend rather than expecting them to come to the authority’s chosen venue.

2. **Make the event more entertaining**; by using participative consultation methods rather than just having speakers 'talk at' those who attend.
3. **Provide refreshments**, e.g. proper meals rather than just tea and biscuits.

Supermarket exhibitions 'took consultation to the people' and successfully engaged the public during their normal daily routines. Levels of interest gauged at exhibitions confirmed that the people of Leeds care about issues presented in the NRWDPD and want to see positive changes. Subject area experts were present at supermarket exhibitions to answer technical questions as they arose; the public appreciated this approach rather than having comments recorded and being told 'someone will get back to you'. The constructive discussions held at exhibitions are a good example of effective stakeholder *engagement*, rather than traditional stakeholder *management* or *consultation*.

Participative consultation methods were planned into the workshop format in addition to traditional 'speaker led' presentations, to ensure all stakeholders had the opportunity to give their opinions. The 'hot topic' desk was designed to allow passionate stakeholders to have their comments recorded without dominating group discussions or preventing others from adding their opinions; it also acted to dispel any tension between stakeholders that enter into the participation process from the perspective of a single issue, and those that have a much broader remit and take a more holistic stance.

Consultation methods used for the NRWDPD were well planned and successfully executed, however levels of response were disappointing and not wholly representative of the Leeds community. Despite best efforts to promote engagement, only 57 completed questionnaires were returned out of approximately 1000 issued at supermarket exhibitions and through the post. Questionnaire analysis highlights a non-representative sample; respondents were predominantly male, 47.5% were over the age of 60, none under the age of 21 and only 12.5% under the age of 40 (as illustrated in Appendix I).

This trend correlates with the notion that individuals who most readily participate are often better-educated, of higher socio-economic status, older or more settled in the area, and have available resources (such as time and money). This has shown to be true in the demographics of our questionnaire respondents and in that several stakeholders had to decline workshop invitations due to lack of resources and time

constraints. For example, the Racial Equality Council couldn't attend as they "don't have enough staff", the Business Development Officer for Holbeck Urban Village was "very interested but unable to attend as workload too high, and not able to spare anyone else", and Leeds GATE "have no budget for this type of event so are unable to attend". It was suggested that, in future consultations – within the boundaries of time, cost and resources - the team engage with schools and youth groups to ensure the views of young people are sufficiently represented.

Ideally, supermarket exhibitions should be repeated at the same venues during the next round of consultation, to include the following improvements:

- **Days and times:** Exhibitions should be held for one day instead of two to allow for broader geographical coverage; Wednesdays should be avoided as these are notoriously quiet shopping days; times of exhibitions should be organised with store managers to ensure exhibition shifts utilise busiest times; and an early and late shift at each location will increase engagement opportunities.
- **Placement within supermarket:** Exhibitions should be booked as non-commercial Council activities to ensure prominent position within the store (e.g. in the store entrance area with high passing flow of customers, rather than in a corner or at the end of the tills where exhibition stands may cause inconvenience).
- **Geographical spread:** Although a geographical spread of supermarket locations was chosen, some 'gaps' can be identified and one stakeholder complained about lack of consultation in her ward (Farnley and Wortley).

Another contributing factor to the low levels of response was the lack of trust and confidence in Leeds City Council. Many members of public felt disheartened by the Council's approach to waste and natural resources related issues, and planning and consultation in general. This acted as a barrier to successful engagement on a number of occasions, with some stakeholders refusing to listen to members of staff or take a questionnaire. This is one of the main problems with consultation; the sometimes justified suspicion that people who are asking for stakeholders' views, are not really interested in hearing them.

Several stakeholders disagreed with Leeds City Council's approach to certain elements of the Issues and Alternative Options report, a situation exacerbated by the negative view of the Council; this was evident in some of the responses regarding options for

dealing with contaminated land. National and regional policy states development should be on brownfield land; stakeholders were asked whether the Council should encourage regeneration of contaminated land through incentives such as prioritising planning applications for developments on contaminated sites. 14% of respondents disagreed with this approach, stating reasons such as “I do not agree with bribes” and “incentives are bribes, are they not?”

Politically contentious issues will always yield strong stakeholder opinions, and, especially in cases where public trust is weak, well planned and genuine attempts at meaningful engagement are essential in rebuilding civil pride and trust in local authorities, in order to obtain useful stakeholder responses. The Jacobs project team purposefully designed consultation events to ensure stakeholders felt they were genuinely contributing to a decision that hadn’t already been made by Leeds City Council. The main aim of the stakeholder workshops was to gather comments without leading stakeholders into making decisions, or believing that certain options were being progressed to the next stage regardless of public opinion. Despite low responses, Leeds City Council and the Jacobs project team were successful in reassuring stakeholders they will be listened to and their responses considered.

5.5 Outcomes and Feedback

Figure 30 presents a summary of the successes, challenges and areas for future improvement for the Outcomes and Feedback stage of the NRWDPD.




 Successes	 Challenges	 Future Improvement
<ul style="list-style-type: none"> • Useful comments obtained for use at Preferred Options • Direct feedback given by technical experts where possible • Responses logged on Stakeholder Response Database by theme • LCC stakeholder database updated with correct contact details • Valuable project team 	<ul style="list-style-type: none"> • Some stakeholders disheartened by LCC; felt responses wouldn't affect outcome of NRWDPD 	<ul style="list-style-type: none"> • Potential to compare approach and progress of NRWDPD with neighbouring Local Authorities and/or Planning Aid to obtain a regional view

Figure 30 Evaluation summary table for '6: Outcomes and Feedback'

In order to comply with the Statement of Community Involvement, Leeds City Council should make provisions for feedback to stakeholders on issues raised during consultation, especially regarding non-DPD related aspects that were raised, and how they plan to include responses in the next stage of the DPD.

Appendix A - Statutory Consultee Responses (by theme)

General Responses

Table A.1 presents a summary of general responses from Statutory Consultees.

General Responses	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> No specific comments at this stage (Issues and Alternative Options) Offered to clarify NRWDPD in context of Regional Spatial Strategy (RSS)
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> The Core Strategy is the key plan within the LDF, and Leeds role as a regional city means that it is particularly important that Core Strategy is produced on time, and that it provides the steer for other DPDs. The GOYH is concerned that the NRWDPD is broaching strategic issues that would be more appropriate in the Core Strategy; we need to think carefully at this early stage about where these strategic levels issues should sit (Core Strategy or lower tier DPD?). The NRWDPD is programmed to be published before the Core Strategy; however this is contrary to the Plan Making Manual advice. It may be appropriate in limited circumstances however we need to think very carefully about how to progress a sound DPD ahead of the Core Strategy. The GOYH stresses the importance of developing the spatial vision before moving onto policy details that will put the strategy into effect. Failure to think strategically first will make it harder to move away from the old-style land use control approach to the more dynamic spatial concept of planning under the new system. The GOYH accept that the waste part of the NRWDPD intends to plan for strategic waste facilities in accordance with PPS10 and the European Waste Directive requirements by 2010. However we will need to show how the NRWDPD policies will link to the RSS, UDP and overarching policies in the Core Strategy. The GOYH is not convinced that the progression of other non-waste issues in the NRWDPD ahead of the Core Strategy is the best way forward. Other DPDs should cover issues not adequately addressed in the Core Strategy; until strategic level policies have been decided it is difficult to assess whether more detailed policies requiring the status of a DPD are needed. The GOYH suggest concentrating on waste and to address other issues raised in the NRWDPD firstly in the Core Strategy, then to decide whether additional detail is needed in another DPD. The chain of conformity (paragraph 5.1 PPS12) to the UDP and/or the RSS needs to be sound, particularly as the NRWDPD is to be published ahead of the Core Strategy. Policies of lower level DPDs need to deliver the spatial vision of the Core Strategy; the chain of conformity between the NRWDPD and the emerging Core Strategy needs to be explained as soon as possible. Proposals Map - The GOYH question the position regarding a Proposals Map; will individual proposals maps be amended and produced? Any changes will require consultation. Documentation - The GOYH comment that the Issues and Options report is very long and the presentation is not particularly clear; there are also some inconsistencies in terms of supporting text and identification of issues. It is therefore difficult to interpret what the baseline position is and what the options really are. Whilst there are no obvious sectors missing, many of the policy areas need a steer in the Core Strategy first. There are likely to be cross boundary issues relating to minerals and waste planning, and the DPD should clearly show how policies will relate to neighbouring authority activities. There should also be effective consultation on cross-boundary issues. The Sustainability Appraisal should show why options were selected over alternatives based on a clear evidence trail, and any variance from

	national or regional guidance will need to be justified through the evidence base.
Environment Agency	<ul style="list-style-type: none"> Content - We are pleased with the range of issues that you are covering in this Development Plan Document and agree with your selection of Key Themes. We support your use of a Natural Resource Flow Analysis as a source of baseline evidence and information. We will expect to be reconsulted on more detailed information on each of the Key Themes as the document progresses.
Yorkshire Forward	<ul style="list-style-type: none"> No non-thematic comments made
English Heritage	<ul style="list-style-type: none"> Issue 1 - Four of the Key Themes (waste, minerals and aggregates, energy, and land use) could have impacts upon the environmental assets of the Plan area. However, none of the suggested Objectives refer to minimising the potential adverse environmental impacts which delivering the particular Theme might have. Whilst it is appreciated that this might be addressed within the overarching Core Strategy or elsewhere within the LDF, nonetheless, the lack of reference to minimising the potential adverse environmental impacts as an objective would appear a significant omission. In the case of minerals and waste, for example, a sustainable strategy for these elements must seek to ensure that any developments do not take place in those areas of Leeds where it would be likely to cause irreparable harm to irreplaceable environmental assets. Thus, the Objectives for minerals and waste should not only seek to ensure the protection of the environment but also a clear intention to direct such developments away from those areas of environmental importance.
Natural England	<ul style="list-style-type: none"> Natural England agrees that the scope of the NRWDPD is appropriate and accepts that other DPDs will also be produced for green space and the environment. Sufficient emphasis does need to be given to landscape character, green infrastructure, public access to the countryside, biodiversity and geological diversity. Natural England would welcome further appraisal of urban landscapes in Leeds as promoted by the European Landscapes Convention, and also make it known that other local authorities are producing Supplementary Planning Documents (SPDs) specifically for landscape character, an approach they would welcome Leeds to take.

Table A.1 Statutory Consultee Responses: General Responses

Waste

Table A.2 presents a summary of responses from Statutory Consultees on the topic of Waste.

Waste	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> No waste specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> The actual proposed targets for Leeds and the current baseline are lost in the supporting text, so it is difficult to judge between options. Issue 2: There is no clear indication of whether Leeds is actually managing its own waste currently. The text refers to a shortfall on landfill sites from 2008/9, which indicates it is not. RSS is very clear that the LDF should be looking at 'at least option 2'. Issue 3: RSS is very clear on suggested priorities for locations. Issue 5: These choices give a message that conflict with the EU Landfill directive and the move away from landfill. It is questionable whether Leeds should be looking at more landfill sites. Issue 6: Baseline figures and LCC targets are included elsewhere in the document but there is no indication here whether any of the options will actually enable those targets to be delivered. In the absence of that information are the questions sound?
Environment Agency	<ul style="list-style-type: none"> The document did not give a lot of detail as to whether approaches would differ for the major waste streams, construction demolition excavation,

	<p>commercial industrial, hazardous, municipal and agricultural. We would expect to see more detail of this at the next consultation stage.</p> <ul style="list-style-type: none"> • Issue 1 Key Themes - We support the key themes in the document and agree that we must break the link between waste production and economic growth, and drive waste management up the hierarchy. We agree that waste must be treated as a potentially valuable resource and that sustainable waste management cannot be achieved without reference to energy use, land use, and climate change factors. • Issue 2 - We support Option 2. The proximity principle is important but we recognise that a sub regional approach may be appropriate, particularly for difficult or hazardous waste streams which require a specific technology for effective treatment. • Issue 3 - We support option 2. We strongly support the view that waste is considered a resource and the choice of locations which maximise opportunities for pushing its treatment up the waste hierarchy. Locations which are close to further processing and to markets for recycle are therefore desirable. Accessibility to sustainable transport options should also be considered. • Issue 4 - We Support option 2. There are real gains to be made in the sustainability of waste management in Leeds if outlets for reuse and recycling can be sited in proximity to potential users/markets. Good design principles and appropriate technology must be employed when integrating waste management with other uses so as to remove possible environmental impacts. • Issue 5 - We support option 1. Landfill is the solution of last resort; we accept that capacity may be required for residual or hazardous wastes, and that this should be within Leeds. Existing sites are likely to offer the least environmental impact, although this is very case specific. • Issue 6 - We support options 2 and 3. Building in effective waste management at the design stage is key to ensuring that as little waste as possible is produced and that it can be efficiently segregated and recycled. • Issue 7 - We would wish to be as flexible as possible, but the following question would need to be answered in relation to this: Can the waste management capacity objectives in the RSS be met without strict allocation of sites?
Yorkshire Forward	<ul style="list-style-type: none"> • Yorkshire Forward welcomes the inclusion of the aspirational target of zero residual waste, supporting objective 5.D i), in the Regional Economic Strategy (RES). The Agency would endorse an intention to develop self sufficiency in treatment of waste but recognises the benefits of working with neighbouring authorities strategically, particularly where logistical benefits may be achieved. Provision of further landfill, should be made only to meet an unavoidable demand, following all other policy impacts, but should be kept to a minimum to meet that projected demand. • Issue 22 Option 4 highlights the potential for energy reclamation from waste; where this is being considered then the opportunity to incorporate heat recovery would be welcomed, providing consistency with both policy ENV5 of the Regional Spatial Strategy (RSS) and Objective 5C(ii) of the RES. Combined Heat and Power (CHP) schemes have significant potential to reduce greenhouse gas emissions and have been highlighted as a key action within the Regional Energy Infrastructure Strategy. This states that 'a particular focus should be the development of community energy schemes in dense urban areas, where the Carbon Trust and EST have demonstrated reductions in primary energy demand of up to 35%'. This would be particularly beneficial were sites to be located in proximity to potential business users.
English Heritage	<ul style="list-style-type: none"> • Issue 6 - In terms of Option 3, 41% of the total tonnage of waste in Leeds arises from construction and demolition. Whilst a large proportion of this waste is recycled, it would be preferable if the plan actually sought to reduce the amount of this type of waste being created by including policies which seek to encourage, in the first instance, the reuse of existing buildings. Only where the reuse of an existing building could be shown to be impracticable or a less sustainable solution should demolition of the building be permitted. At present, in terms of the built environment, the top of the waste hierarchy (i.e. waste prevention) is missing.

Natural England	<ul style="list-style-type: none"> • Issue 2 - Natural England feel the difference between options 2 and 3 is unclear. They would prefer for waste to be managed as close to source as possible, and with the greatest potential for sustainable processing and transit. • Natural England support waste developments in least sensitive locations (in terms of environment, biodiversity, landscape character and green space); however options chosen for waste management facilities should not restrict the range of waste streams that can be handled within Leeds. • Issue 6 - Natural England welcome the fact that Leeds have a Sustainable Design SPD, and advise that the NRWDPD should signpost developers to this.
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Table A.2 Statutory Consultee Responses: Waste

Minerals and Aggregates

Table A.3 presents a summary of responses from Statutory Consultees on the topic of Minerals and Aggregates.

Minerals and Aggregates	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> • No minerals and aggregates specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> • MPS1 is clear on identifying Minerals Safeguarding Areas or Areas of Search for all minerals. We would expect to see adequate reserves safeguarded for all relevant minerals: aggregates/ sand and gravel / brick clay and limestone. This is not made clear in the options. • Issue 8: There is a real issue here of not having adequate reserves in terms of MPS 1. The policies should go beyond 2016 to 2021 - option 1. Current RTAB work is trying to get away from simple historical trends forecasts and the second phase of the Sand and Gravel study will help Leeds consider issues. Option 2 is clear RSS guidance • Issue 9: The text makes clear there are sand and gravel reserve issues for the sub region. Leeds has a major demand for sand and gravel and it is important that they look at identifying more reserves (which is separate from giving planning permission). We would expect to see Minerals Safeguarding Areas or Areas of Search at next consultation stage. • Issue 10: Options 1-3 are all necessary to meet MPS1. We are not sure what option 5 actually means. If it involves looking outside the district is this realistic? • Issue 12: How will the sub regional target be met if there is nothing from Leeds? Is continuing current policy realistic if we are also to consider sustainable transport/ reduced travel for natural resources? • Issue 14: The current national policy is still a presumption against development of opencast. • Issue 16: Leeds should be much more positive and proactive on this issue. There is no indication what the impact of recycling would be from any option or how they meet the Council's recycling targets. • Additional issue: There are two large clay working sites in the district with big reserves. Clay a very important building material for Leeds in terms of MPS 1 We would expect to see safeguarding of existing reserves in line with the MPS.
Environment Agency	<ul style="list-style-type: none"> • We encourage the recycling and reuse of aggregates and the support the restoration of quarry sites to uses that are positive to biodiversity.
Yorkshire Forward	<ul style="list-style-type: none"> • No minerals and aggregates specific comments
English Heritage	<ul style="list-style-type: none"> • Issue 8 - The 2004 RAWP Report noted that there was an urgent need for a study to assess the likely environmental impacts of additional sand and gravel extraction in the Region and the ability of the producing areas to absorb it. The RSS Topic Paper on Minerals - which was produced by the Regional Assembly as part of the emerging RSS - also identified the need to assess the likely environmental impacts of additional sand and gravel

	<p>extraction together with the ability of the aggregate-producing areas to absorb such impacts. It also highlighted the inappropriateness, within a framework of plan-monitor-manage, of continuing to apportion totals for such extraction based upon existing historic shares. The sub-regional apportionments contained in the 2004 RAWP annual report (and upon which those within the RSS are based) do not take account of the implications of the assessment of the likely environmental impacts. It may well be the case that the results of the additional work currently being undertaken to investigate environmental constraints (and, indeed any work undertaken in the identification of Preferred Areas within this DPD) may well indicate that the figures are undeliverable without causing significant harm to the environment of Leeds. Given that the Sand and Gravel Study has yet to be finalised, it would seem inappropriate to identify a total provision for the whole of the Plan period to 2021 given that the figure could well be amended. Therefore, it might be preferable to adopt a phased approach along the following lines:- (a) A target for the first part of the plan period (to include already committed reserves and those parts of the Plan area where Areas of Search or Preferred Areas can be identified which do not appear to pose any significant environmental problems); and (b) A figure for the second part of the plan period based upon the past apportionments but with a clear proviso that this is a figure which will be reviewed in the light of the second stage of the Sand and Gravel Study.</p> <ul style="list-style-type: none"> • Issue 10 - It would seem sensible for the DPD to identify either broad Areas of Search and/or Preferred Areas for sand and gravel extraction. This would provide a degree of certainty (both for minerals operators and the local community) and would ensure that all the potential options for meeting the supply of sand and gravel are examined at a strategic level. In the absence of such an approach (Option 4), the supply would be managed on a purely reactive basis as, and when, planning applications are submitted. This may not always be the most appropriate approach to safeguarding the environmental assets of the area or the quality of life of its communities. • Issue 11 - The sand and gravel reserves at the northern end of the plan area are located in one of the most attractive landscape areas of the District. In the vicinity of this area there are a number of important historic assets (including the Grade I Registered Historic Park and Garden at Harewood). Future extraction should seek to minimise the adverse impact it might have upon the landscape character and the historic assets of this part of Leeds. • Issue 12 - Given the considerable reserves of crushed rock in the District, it would seem appropriate to continue with the existing approach. • Issue 13 - Annex 3 of MPS1 requires important sources of building and roofing stone to be safeguarded. This includes not only quarries which are currently being worked, but also former quarries which have the potential to be reopened to supply material for the repair and restoration of historic structures and buildings in the area. English Heritage has commenced work on identifying such quarries. Unfortunately, given the scale of the task, it is unlikely to be completed for a year or so. In the meantime, we would advocate a general Policy for the protection of such quarries supported by a Supplementary Planning Document based upon the information which English Heritage will, eventually, be producing for each of the planning authorities across the country. If you consider it would be useful, we could suggest a form of wording for inclusion within the Local Development Framework.
Natural England	<ul style="list-style-type: none"> • Natural England would hope to see a maximisation of the use of substitute and secondary aggregate minerals in line with RSS policy. • Where it is necessary to define new extraction sites, Natural England would like to see detailed consideration of site restoration, linked to Biodiversity Action Plans, and linked to a possible coherent network of green infrastructure including opportunities to link or repair fragmented habitats in line with PPS9 (e.g. linked wetlands or grasslands with increased public access to the countryside where possible). • Natural England state that the presence of SSSIs and UK priority habitats in or close to the Aire/Calder Valley and Wharfe Valley Sand and Gravel

	<p>Reserves may necessitate consideration of extraction impacts on these sites if any are planned within up to 2km of sites.</p> <ul style="list-style-type: none"> • Natural England would prefer to see construction and demolition waste recycled on site but acknowledge the need to provide some specialist recycling facilities, preferably as close to construction sites as possible to reduce traffic impacts (likely to be in industrial estates). • Natural England believe that after use schemes can play a valuable role in augmenting Leeds' green infrastructure network and should be informed by Leeds' Green Space Strategy / PPG17 Open Space Study, Leeds Landscape Character Assessment and Biodiversity Action Plan (BAP). Natural England also note that habitat action plans within the Leeds BAP include Magnesium limestone grassland, reedbed and hedgerow and field margins, all of which can be achieved within quarry restorations.
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Table A.3 Statutory Consultee Responses: Minerals and Aggregates

Land Use

Table A.4 presents a summary of responses from Statutory Consultees on the topic of Land Use.

Land Use	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> • No land use specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> • No land use specific comments
Environment Agency	<ul style="list-style-type: none"> • We support the clean up of contaminated land in a manner that does not cause harm to the water environment.
Yorkshire Forward	<ul style="list-style-type: none"> • The section on land use should recognise that greenspace is valuable not only as an amenity but also in terms of tackling climate change. Greenspace can provide a source of renewable energy via forestry management, and provide important areas for water storage which can help to mitigate increased rainfall and lessen the impact of river flooding.
English Heritage	<ul style="list-style-type: none"> • No land use specific comments
Natural England	<ul style="list-style-type: none"> • Issue 31 - Natural England would agree that optimum use of brownfield land is desirable in terms of limiting development in less sustainable rural areas. From this perspective, contaminated land is a wasted resource and clear up should be promoted. However, care should be taken to mitigate for any significant biodiversity loss from the development of a site, and consideration should also be given to the potential for developments to contribute to the provision of urban greenspace to help meet local standards that may be promoted in Leeds' greenspace strategy / PPG17 study, or the national ANGSt standard promote by Natural England. (Natural England recommends that people in towns and cities should have: -accessible natural green space less than 300m (in a straight line) from home; -at least one accessible 20 ha site within 2km of home; -one accessible 100 ha site within 5km of home; -one accessible 500 ha site within 10 km of home; -statutory Local Nature Reserves provided at a minimum level of 1 ha per thousand population)

Table A.4 Statutory Consultee Responses: Land Use

Energy and Climate Change

Table A.5 presents a summary of responses from Statutory Consultees on the topic of Energy and Climate Change.

Energy and Climate Change	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> No energy and climate change specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> We would expect a much more positive lead from Leeds as to how they are going to meet the objectives and targets of RSS for low carbon. There is no indication of what any option listed here might deliver against the objectives. Issue 22: PPS 22 is very clear you cannot be technology specific in what you accept or reject. The definitions of 'larger scale' energy production are unclear, there is no indication of what the relative contributions of those technologies might be, and the choices are 'cost free'. A lot of work is needed to turn this issue into a preferred option. We are not sure there is any scope for geothermal in Leeds – does it they mean ground source heat pumps instead? Issue 23: The reference should be to PPS22 not PPS25. It is contrary to PPS22 to exclude areas for renewable energy. Issue 24: A proper evidence base is needed to support these options. There is no indication of how realistic or deliverable they are. Issue 26: PPS22 is very clear on the need to support all technologies. It would be better to have policy in document rather than scattered across several DPDs, to ensure consistency of approach and thresholds. Also new PPS25 questions the number of DPDs necessary. Issue 28: This is not related to LDF preparation but is an information / opinion gathering exercise for other Council action. If government policy makes it permitted development then a policy will not be need in the LDF. Issue 29: Sites for larger scale hydropower were identified in the original REAS for the region back in 2002. Sites will not have changed, so there is little need for additional work. We might expect to see a policy on the scale of hydrogenation, although we are not convinced that individual household hydro power is a significant possibility in Leeds. Issue 30: PPS22 and RSS both actively support local energy generation but this will be of limited application and focused principally on new development, rather than retro fitting. We would support further work on this topic but it needs to be clear that it is unlikely to be generically applicable across whole district
Environment Agency	<ul style="list-style-type: none"> Issue 21 - We do not have a preference for either option but agree with the need to locate these facilities with protection of groundwater and surface water as key criteria. Issue 24 - We support the NRWDPD providing an overall policy basis for supporting renewable energy development as an integral part of new developments.
Yorkshire Forward	<ul style="list-style-type: none"> We suggest that Leeds City Council should incorporate a policy in the Natural Resources and Waste document that seeks to incorporate on-site renewable energy generation, and other low carbon technology, that would reduce the predicted carbon dioxide emission by at least 10%. Yorkshire Forward recognises and welcomes the proposed treatment of water efficiency and water as a resource, and supports the principle of including water efficiency in the document. The principle of reducing, re-using and recycling water resources is appropriate for all new developments. Although Figure 5 (key themes) states 'policies should include locational guidance for new development to encourage use of more energy efficient transport', Yorkshire Forward suggests a need to minimise travel demand. This is supportive of Policy T1 of the RSS which highlights 'a key aim of transport planning policies is to reduce the need to travel'.
English Heritage	<ul style="list-style-type: none"> No energy and climate change specific comments
Natural England	<ul style="list-style-type: none"> Issue 20 - It is unclear what is meant by option 3 ("plan and invest in

	<p>other energy sources as a major provider for the City”); examples would be useful. Natural England supports options which focus on renewable sources and achieving greater efficiencies to contribute towards regional and national carbon reduction targets.</p> <ul style="list-style-type: none"> • Natural England note that although they welcome carbon Capture and Storage (CCS) technology in the mid-term, this should not be a substitute for renewable energy, which, unlike CCS, does not deplete finite resources. • Biomass is currently a favoured source of renewable energy due to its cost-effectiveness, however Natural England highlight energy costs associated with importing biomass; local sourcing should be encouraged wherever possible. Natural England currently manage an energy crops grant scheme which is informed by opportunity maps for energy crops taking into account environmentally sensitive locations and reasonable transportation distances. • Natural England consider energy from waste and landfill gas appropriate options only if waste is otherwise unusable. • The threat of climate change means renewable energy development should be encouraged however certain technologies have constraints that outweigh the benefits of individual schemes. Natural England is currently drafting wind potential maps where key issues will be presented spatially. Criteria based policies should be used to ensure the LDF is robust enough to handle a range of renewable energy generation possibilities. • Issue 29 - Natural England would welcome further appraisal of this technology, however consideration of effects on riparian biodiversity is key.
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Table A.5 Statutory Consultee Responses: Energy and Climate Change

Water Resources

Table A.6 presents a summary of responses from Statutory Consultees on the topic of Water Resources.

Water Resources	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> • No water resource specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> • No water resource specific comments.
Environment Agency	<ul style="list-style-type: none"> • We support the documents examination of water resources and their availability, water efficiency and minimising water use. You are correct to emphasis the requirements of the Water Framework Directive and we support any initiatives put forward to meet the requirements of the Directive. You should use the Environment Agency’s Aire and Calder Catchment Abstraction Management Strategy as a source of information. • Issue 32 - We support both of these two options and agree that a policy will need to be put in place to protect water quality. • Issue 33 - Water Cycle Studies could be done for areas of predicted growth, for example the Area Action Plan Areas. This would allow problems of flooding, sewerage, water resources and water quality to be considered holistically across an area. They would identify problem areas, required improvements and suggest mitigation. This approach would be more evidence based and have wider benefits than a blanket removal of PD rights. • Issue 34 and 35 - We consider that the DPD should promote water efficiency measures for all new developments. This should be done alongside a policy of encouraging reduced water use plus recycling and reuse.
Yorkshire Forward	<ul style="list-style-type: none"> • Although the 2007 floods were largely from pluvial rather than fluvial causes the document should recognise that future fluvial flooding will be

	increasingly likely. The costs and impacts of such flooding events may be similar regardless of the cause of the flooding.
English Heritage	<ul style="list-style-type: none"> • No water resource specific comments
Natural England	<ul style="list-style-type: none"> • Issue 32 - A mix of the two options may be most appropriate, based on the sensitivity of different water bodies. As suggested in the SA, Option 1 would benefit sensitive sites for biodiversity and reduce pollution; however the second option would also require that all development would have not detrimental impact on water quality. • Issue 33 - A green roof with a 150mm substrate will allow 40 percent of annual rainfall to run off from the roof. A conventional roof will allow 81 percent of annual rainfall to run off (REF: Green Roof Centre, The Benefits of Green Roofs PowerPoint Presentation, delivered 17 June, 2008, University of Sheffield). Sheffield's LDF has recognised this and drafted a green roof policy in its City Policies Preferred Options (http://www.thegreenroofcentre.co.uk/pages/GreenRoofPreferredPolicy8_06_07.pdf). • Issue 34 - Natural England recognises that water efficiency is critical to halting biodiversity decline from rivers and wetland in the UK and plays a role in reducing greenhouse gases through saving energy required to pump and purify water. The importance of water efficiency may be heightened in periods of prolonged dry weather as may occur more frequently with climate change (REF: The Yorkshire and the Humber has had a 15.9 percent decrease in summer precipitation between 1914 and 2006 (http://www.ukcip.org.uk/images/stories/08_pdfs/Trends_precip_maps.pdf). Attenuation of water is also desirable to reduce the impacts of increased rain intensity as climate changes. E.g. Green roofs can reduce roof run off significantly. • Issue 35 - We would support a policy that promotes reduce, re-use, recycle for water resources for new development as this will help reduce run off and reduce demand for water.

Table A.6 Statutory Consultee Responses: Water Resources

Air Quality

Table A.7 presents a summary of responses from Statutory Consultees on the topic of Air Quality.

Air Quality	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> • No air quality specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> • No air quality specific comments
Environment Agency	<ul style="list-style-type: none"> • No air quality specific comments
Yorkshire Forward	<ul style="list-style-type: none"> • No air quality specific comments
English Heritage	<ul style="list-style-type: none"> • No air quality specific comments
Natural England	<ul style="list-style-type: none"> • Issue 36 - It would be useful for this DPD to contain an overarching policy on air quality, and for other DPDs to include specific policies. Part of the solution to improving air quality will be the provision of green infrastructure. For instance, street trees can capture particulate and other pollutants. Air quality issues that might arise through use of biomass should also be addressed if these are significant. • Issue 37 - Although we do not have a specific view on this, where air pollution may have an effect on a designated site for biodiversity this should be assessed, at the DPD level where it is possible to see industrial site allocations in relation to designated sites, and at the planning stage (most likely through EIA). • Issue 38 - We would welcome air pollution mitigation within and outside of AQMAs, although clearly the former is the priority (Air pollution is not just

	<p>a problem in AQMAs and PPS23 suggests other areas where air quality may be poor, including where the cumulative impacts of a number of smaller developments work together to reduce air quality. The SA has also identified that air pollution also contains a number of greenhouse gases. Also, the APIS website (www.apis.ac.uk) provides information on the sensitivity of areas to air pollutants affecting habitats. For instance, upland heathland habitats in sites close to Leeds have exceeded critical loads for acid deposition, so efforts to reduce diffuse pollution will be beneficial). We are also pleased to note that the supporting text recognises the benefits that biodiversity creation can play in mitigating air pollution. In air quality management areas there is the potential for policies to promote low emissions strategies. We would welcome development of such strategies, either for wide areas or specific developments as they can promote use of low emission vehicles and reduce construction and operational impacts ('Planning', 9/05/08: http://www.planningresource.co.uk/careers/features/807973/breath-fresh-air/).</p>
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Table A.7 Statutory Consultee Responses: Air Quality

Sustainability and Integration

Table A.8 presents a summary of responses from Statutory Consultees on the topic of Sustainability and Integration.

Sustainability and Integration	
Yorkshire & Humber Assembly	<ul style="list-style-type: none"> No sustainability specific comments
Government Office for Yorkshire & The Humber (GOYH)	<ul style="list-style-type: none"> Issue 30: PPS22 and RSS both actively support local energy generation but this will be of limited application and focused principally on new development, rather than retro fitting. We would support further work on this topic but it needs to be clear that it is unlikely to be generically applicable across whole district
Environment Agency	<ul style="list-style-type: none"> Sustainability Appraisal - For matters concerning waste it is difficult to comment unless location and technology type are known. The response is likely to differ depending on the waste stream being managed. These issues were identified by the SA – we have no further comment at this stage.
Yorkshire Forward	<ul style="list-style-type: none"> Green Infrastructure - The finalised RSS includes Policy YH8 on Green Infrastructure, which states that Local Development Frameworks should 'define a hierarchy of green infrastructure, in terms of location, function, size and levels of use at every spatial scale'. Therefore it would be appropriate to include a policy relating to green infrastructure in order to improve consistency with Regional Policy.
English Heritage	<ul style="list-style-type: none"> Sustainability Appraisal - Page 18, Objectives section - Four of the Key Themes (waste, minerals and aggregates, energy, and land use) could have impacts upon the environmental assets of the Plan area. However, none of the suggested Objectives refer to minimising the potential adverse environmental impacts which delivering these particular Themes might have. For the majority of the environmental SA Objectives, the Appraisal has identified that the impact will depend upon how the particular SA Objective is implemented. Given this uncertainty, it might have recommended that a specific Objective relating to the protection of the environment be included within the DPD for each of these Key Themes. Sustainability Appraisal - Page 53, issue 6 - In terms of Option 3, 41% of the total tonnage of waste in Leeds arises from construction and demolition. Whilst a large proportion of this waste is recycled, it would be preferable if the plan actually sought to reduce the amount of this type of waste being created by including policies which seek to encourage, in the first instance, the reuse of existing buildings. Only where this could be shown to be impracticable or a less sustainable solution should demolition of the building is permitted. At present, in terms of the built

	<p>environment, the top of the waste hierarchy (i.e. waste prevention) is missing. Therefore, the Sustainability Appraisal might recommend that the policy framework for building and construction waste is amended accordingly.</p> <ul style="list-style-type: none"> • Sustainability Appraisal - Page 59, issue 8 - In terms of SA Objectives 15 and 16, we do not agree with the conclusion that continuation of the past trend would have a neutral impact upon the historic environment or the landscape of the area. The sand and gravel reserves at the northern end of the plan area are located in one of the most attractive landscape areas of the District. In the vicinity of this area there are a number of important historic assets (including the Grade I Registered Historic Park and Garden at Harewood). Not surprisingly, therefore, we cannot agree that increasing the amount of aggregate (Option 2) would be “unlikely to have an effect upon the historic environment”. • Sustainability Appraisal - Page 72, issue 11 - In terms of SA Objectives 15 and 16, we do not agree that the conclusion that placing limits on extraction in current areas of known sand and gravel resources would have no significant effects upon the historic environment or the landscape of the area. The sand and gravel reserves at the northern end of the plan area are located in one of the most attractive landscape areas of the District. In the vicinity of this area there are a number of important historic assets (including the Grade I Registered Historic Park and Garden at Harewood). Restricting minerals development in the areas of current known resource (Option 1) could actually have significant benefits when judged against these SA Objectives. • English Heritage strongly advises that the conservation section of the Council and archaeological staff at WYAS are closely involved throughout the preparation of the SA of this DPD. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.
Natural England	<ul style="list-style-type: none"> • Issue 39 - Rail and water freight are considerably less polluting than road freight. Where there are opportunities to move freight by sustainable modes they should be supported by this DPD. • Issue 40 - Natural England recognise that a range of land types may be required to support sustainable development. However, impacts should be mitigated or compensated for, or if they cannot alternative sites should be considered. • Issue 41 - We would encourage the co-location of certain facilities, such as waste recycling with CHP, as this can bring benefits such as the reduction of waste energy. However the cumulative effects of such developments should be considered on receptors such as the local biodiversity resource, landscape and the availability of accessible green infrastructure. • Natural England broadly agrees with the findings of the interim SA and we look forward to reading the full report, including proposals for mitigation and monitoring. We were particularly pleased to read the Natural Resource Flow Analysis which acted as a useful supporting document to the DPD and SA. It would be useful to clarify how the recommendations of this document have been taken into account when preferred options are produced. • We note the absence of a Habitats Regulations Assessment report with the DPD. We would advise that it will be important to consider whether any of the effects of this DPD would significantly affect the conservation objectives of any European nature conservation sites within its zone of influence, and in combination with other plans, to demonstrate that the plan is complicit with the Conservation (Natural Habitats &c) Regulations, 1994 (as amended, 2006). I would be happy to discuss this further with you.

Table A.8 Statutory Consultee Responses: Sustainability and Integration

Appendix B - Written Responses (Internal, External and Public)

General Responses

External Stakeholders

Table B.1 presents a summary of general responses from External Stakeholders, received in letter or email format.

General Responses	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> I would like it to be noted that the Leeds Voice Environment Forum welcome this document and the innovative and strategic approach to managing our natural resources. We would welcome further opportunities to contribute to the NRWDPD and associated work. Leeds City Council is also currently consulting on other things covered by the topic of this DPD (e.g. waste)... we feel like we're just bringing up the same issues over and over again. We don't believe that our opinions are actually taken into account, and there's also confusion about whether consultation responses should relate to the current situation, or should take into account what we think will happen in the future. Will these issues and options even be relevant or applicable by 2010? Issue 1 - Although it falls into many areas listed above (especially land use and water resources) I feel Biodiversity is a key natural resource. The value of Biodiversity in broad terms is understood but at a local level we need clearer demonstration that ecosystem services linked to bio-diverse multi-functional landscapes are key to meeting peoples needs sustainably. Soil is far more important than its position in the document reflects. Soil is a one of the key life-sustaining natural resources (along with air, sunlight, biosphere and water) and comes under considerable pressure. Soil resources need to be linked to ecosystems or agro-ecosystems that utilise natural nutrient cycles and organic matter cycles and protect soil from erosion, leeching, compaction, acidification, nutrient depletion and general degradation. Is soil and permiculture missing from the DPD? It seems that the utilisation of green space within the city for food and fuel production is missing from the plan, e.g. wood is not really mentioned in the NFRA. Soil is key! Can we make national level recommendations for inclusion in this plan because national constraints have significant impact on local action? Ideally we want our views put to central Government. Poor method of consultation; the documents are not well phrased and the issues not well communicated. The DPD is too broad and tries to tackle too many issues (although we do acknowledge that links and inter-relationships exist). People can answer the questionnaires in a number of different ways depending on which hat they wear when answering them (e.g. as an individual or an environmental expert). Leeds is not responsive to the views of forums like this. There's no point us giving our views unless LCC actually listen to them and are willing to show how they implement them. Trust issues with LCC, e.g. it is a known fact that schools don't recycle, and that consultation responses given in the past have been ignored. Eager to make it known that the focus on waste highlights an interest in the area where people feel they can make a difference, not a disinterest in the other areas.
Stakeholder B: South Headingley Community Association	<ul style="list-style-type: none"> Projects which reduce quality of life must not be sited near people's homes, and all efforts made to minimise their effect on the environment. Leeds needs to put 'Best Practice' first and resist the temptation to simply find ways around Government Targets (to make it look as if these are being met, when probably they are not). There is much excellent practice, especially in the South of England. Leeds needs to research this, on an on-going basis, and benefit from advances in ideas and technology.

Stakeholder C: The Coal Authority	<ul style="list-style-type: none"> This DPD should concentrate on only themes A and B (waste and minerals). The other themes C (energy and climate change); D (land use); E (water resources) and F (air quality) are key strategic issues and as such should be contained within the Core Strategy.
Stakeholder D: Leeds Local Access Forum	<ul style="list-style-type: none"> Public Access and recreation can be affected by development planning, for example changes of the use to which land is put may change the amenity enjoyed by access users of that land or adjoining land. The LLAF therefore is interested in the LDF process as regards the Core Strategy, about which it has commented, and site specific allocations of land. In regard to the latter point the LLAF would need to address the following: - does a site specific allocation potentially impact on access, whether on CRoW Access Land or public rights of way, resulting in more or less access being available? - does a site specific allocation potentially impact on the quality of the experience enjoyed by public access users, whether on an area or linear basis, resulting in more or less access being available? - for any site specific allocation are there any safeguards which could be adopted to maintain access or the quality of experience of access users? As regards the present consultation, most of the issues at this stage are very broad such that the LLAF is unable to comment except in the general sense outlined in the 3 bullet points immediately above. The LLAF would hope to make a fuller response at the next stage when there are specific site allocations.
Stakeholder E: Highways Agency	<ul style="list-style-type: none"> The Highways Agency is responsible for the operation, safety and environment of the strategic road network (SRN) in England. Within Leeds, the strategic road network comprises • M621 • M62 • M1. Therefore, the comments given in this response are with reference to the potential impact of the proposals on these routes. Further to the Agency's representation at the NRWDPD workshop on the 13th of June, 2008 held at the Leeds Town Hall, further comments are made on specific issues.
Stakeholder F: CoalPro	<ul style="list-style-type: none"> The Confederation of UK Coal Producers (CoalPro) represents member companies who produce over 90% of the UK coal output. I have only just become aware of the Leeds LDF Natural Resources and Waste DPD Issues and Alternative Options consultation. As an important body representing a major part of the minerals industry, CoalPro would have expected to be informed of, and consulted with, directly on such an important document.
Stakeholder G: FTMINS Chartered Minerals Surveyor	<ul style="list-style-type: none"> We advise and represent clients with interests in the Leeds CC area. In particular clients with building stone and aggregates resources which may be needed in the area in the future. We should like to ensure that our client's plans and proposals for development of their minerals are in sympathy with the Planning Policies being developed for use of such resources in the future. We would be grateful if you would therefore list us on your database of interested parties to be included in future consultations.

Table B.1 External Stakeholder Responses: General Responses

Internal Stakeholders

Table B.2 presents a summary of general responses from Internal Stakeholders, received in letter or email format.

General Responses	
Stakeholder H: Leeds City Council	<ul style="list-style-type: none"> He told me that he felt the consultation has been poor, as not many people know about it (although I got the impression he was mainly talking about LCC consultations in general). Also, people seem to be operating in silos and consulting individually but are obviously linked (e.g. us with NRWDPD, PPG17 sports and recreation provision consultation, and others). I explained to him what we have done, but he thinks that it was a significant omission not to take the consultation to the Local Area Committees. There are 8 Local Area Committees (each comprised of 4 wards) - next meetings taking place over next few days (end June/beginning July) and are well attended by the public so would be a

	<p>good form of engagement. John pushing for the DPD to be included on the agenda of his next area committee meeting.</p> <ul style="list-style-type: none"> • Suggested that we would receive higher response rates if we effectively extended the consultation period to 12 weeks, by pre-announcing the 6 week period 6 weeks earlier - this will encourage people to respond as they feel they have time to send in a proper response.
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Table B.2 Internal Stakeholder Responses: General Responses

General Public

Table B.3 presents a summary of general responses from members of the public, received in letter or email format.

General Responses	
General Public A	<ul style="list-style-type: none"> • Paramount consideration in compiling this Strategy must be Quality of Life for the people of Leeds, both as citizens of Leeds and of the World. This must include ALL communities equally. No community must be treated as 'expendable' or warranting lesser consideration than others. Leeds needs to continually research and evaluate the 'best practice' from elsewhere. Leeds should found its policies on 'best practice' rather than finding ways to appear to meet targets. 'Best Practice' will meet Government targets, but not at the expense of the people of Leeds. • Key Issues - these seem fine as a list. Objectives of each are broadly OK but need to always keep the needs of communities in mind. Leeds needs to respond to communities when problems are experienced, and find solutions in partnership with the community (Leeds council is, after all, funded by its communities). This means community individuals and neighbourhood associations, the people who fund Leeds, not just Councillors, statutory bodies and groups with a commercial interest.

Table B.3 General Public Responses: General Responses

Waste

External Stakeholders

Table B.4 presents a summary of Waste responses from External Stakeholders, received in letter or email format.

Waste	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> • Issue 2 - Option 1, 2 and 3. Leeds 1st priority is managing its own waste sustainably. It should ensure it works within the LCR and with neighbouring authorities and partners to ensure we deliver a sustainable waste resource management system that maximises opportunities for reducing waste and reusing and recycling waste resources locally. Whether we focus on Leeds' waste or providing infrastructure to serve a wider market we must always focus on minimising the ecological footprint and social impacts of the waste resource system and maximise the economic and social value of the waste resources. • Issue 3 (options 1 and 2) - Modular, rather than centralised, systems provide more local employment opportunities, can reduce the need for transport and are more easily adaptable to changes in the types and volume of waste resource they treat. Centralised infrastructure may help achieve economies of scale and mean fewer communities encounter problems associated with living near waste management facilities. Both options need to be assessed in terms of their social, economic and environmental sustainability. Centralisation is probably favourable in terms of NIMBYism (as fewer communities will have waste management facilities located near them) but modular systems and smaller local sites are more flexible and can be easier to manage in terms of achieving positive impacts on local communities and minimising negative impacts.

	<ul style="list-style-type: none"> • Issue 3 (option 3) - Small-scale local sites for treating and recovering value from local waste streams, or providing resources (material inputs) for local economic activity should not be restricted only because they are managing waste. They should be restricted only where the socio-economic and environmental impacts (within and outside the 'sensitive area') of the new facility will outweigh the benefits of providing the infrastructure. There is no need to exclude all waste management facilities from all residential areas, business parks and other sensitive use areas- only those waste management facilities which where negative impacts outweigh environmental, economic and social benefits. • Issue 4 - I agree with option 2. The spirit of the regulations should be followed but with intelligent interpretation to deliver more sustainable waste resource systems. • Issue 5 - I am unsure which the most environmentally, economically and socially sustainable option is. I would support the most sustainable option. I do not think we can rely on non-Leeds sites because of the scarcity of suitable sites means competition may be high. • Issue 6 - Yes to Option 1, 2 and 3. The focus on strategic sites should is important but local infrastructure and new developments should also provide improved recycling and reuse infrastructure. • Issue 7 - Option 2: Yes. I think we should not constrain our land use unnecessarily. We should protect suitable waste management sites from unsuitable, unsustainable development but not from all other types of development. The most sustainable option needs to be sought. <p>Other general comments relating to Waste:</p> <ul style="list-style-type: none"> • Government wants Local Authorities to reduce the amounts of waste going to landfill but what pressure is there from Government on manufacturers to reduce packaging and label packaging properly so consumers know exactly what they can recycle? (Mentioned the triangle-numbering system and its inconsistencies). Example given of paint partnerships with Tesco – need for infrastructure investment to cope with projected increased paint volumes turned Tesco off, seems like they were only willing to pay lip service to the idea and not actually invest. • Need to make sure that the role of social and voluntary enterprises is not overlooked in the plan; they offer an easy pathway to the community and large recycling centres should not take away from this. Geographic location and social make-up need to influence the location and types of sites. • Need to start at the beginning of the waste hierarchy and focus on reducing waste by relating back to peoples lives and making it relevant to them (e.g. not only “where do you store an old 3-piece-suite while waiting for it to be collected”, but “do you really need a new sofa in the first place?”). Space for recycling is a big issue in Leeds (lots of back-to-backs) – links to frequency of collections • Better communication and education is essential; people need clear information on what they can recycle, where and when, and exactly what the Council does with the waste afterwards. Communication is currently erratic and people distrust the Council when they see all waste being collected together (recyclable and non-recyclable). • Personal perceptions play a key role in behaviours, e.g. “I won't recycle plastic in my green bin anymore as it all gets shipped to Indonesia”. We need to start with a behavioural shift otherwise plans won't work anyway. • Shared 'bin yards' don't work! Shared facilities are heavily contaminated, ineffective and don't encourage recycling. Links back to people needing to understand what they <i>should</i> be doing – behaviour change, awareness and learning. • The public needs to be shown the benefits; not just the economic benefits of recovering value from recycling waste but also social and environmental value. • Hierarchy of preferences for recycling: reduce – local disposal – regional – national – European – rest of world as a last resort, not a first choice. Can't sustain current waste practices, therefore reduction and behavioural change must be key. This must be demonstrated from the top e.g. recycling in schools and council buildings – LCC needs to practice what it preaches.
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<p>Stakeholder I: Friends of the Earth</p>	<ul style="list-style-type: none"> • Issue 2 - Option 1: The proximity principle strongly suggests that waste should be dealt with close to its source. Generally this will involve waste that is generated in Leeds being managed in Leeds. The import from and export to other local authorities therefore should be strongly discouraged. However, there will be areas where disposal and treatment facilities in other authorities are closer to Leeds households than Leeds facilities. Arrangements could be implemented to provide an exception to this principle. Only when clear evidence is able to show that there is a strong environmental benefit (e.g. through economies of scale) should limited import and export be allowed. • Issue 3 - It is regrettable that the final RSS does not include targets for waste reduction, merely a vague reference to a significant reduction in waste production. Given that there will be a waste reduction (as stated as an outcome in ENV12); it then becomes difficult to justify the construction of new waste management facilities unless the construction is designed to push waste up the waste hierarchy. Also, the regional targets for recycling are woefully inadequate (aiming at 50% by 2020) when some local authorities in the region (e.g. Ryedale with 42% of household waste being recycled) are already exceeding the 2010 target. If Ryedale are performing at this level, why can't Leeds? If there is a real need for additional capacity for waste treatment, then this should be located such that the collection, transportation and final disposal/shipment to market can be done as resource-efficiently as possible. This is likely to mean that recycling and treatment plants are located together (as in Option 1). On the issue of bring facilities, these should be located at widespread locations throughout the authority in locations which make it as easy as possible for householders to use. This should be accompanied by a much more thorough recycling collection system than is currently in place. • Issue 4 - Option 2 – As far as possible reflect national planning guidance but seek to achieve a practical balance between environmental protection, the need to reflect local circumstances and the specific location needs of certain waste management facilities. Departure from national and regional planning policy should only be considered where there is an environmental benefit to be gained from doing so. • Issue 5 - Option 1 – If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits. Friends of the Earth agree with aspiration towards zero waste. We are convinced that the amount of additional waste going to landfill can be significantly reduced through the application of robust policies to reduce, reuse and recycle thus reducing the need for additional landfill capacity. ENV14 of RSS states that existing mineral and landfill sites should be used, where additional capacity is necessary. • Issue 6 - All of the above options should be deployed to increase reuse and recycling rates. The City Council needs to be much more ambitious in setting its targets. By setting higher targets, the city can raise its game to the levels achieved by the best performing authorities in the country. The aspiration mentioned in Issue 5 towards zero waste must be backed up by a robust target, strong measures to achieve that target and effective delivery of those measures. • Issue 7 - Option 2 – A more flexible approach should be taken where the need for other uses may be acceptable. As the authority develops, alongside a strong national framework, its effectiveness in reducing waste levels the need for waste management facilities should be reassessed regularly. This may mean that other uses of the land are considered. However, this should not lead to pressure on the land becoming such that future waste management facilities are located in sub-optimal sites due to loss of the most optimal to other developments.
<p>Stakeholder B: South Headingley Community Association</p>	<ul style="list-style-type: none"> • No to incinerators or heat from waste by incineration. Objectives should be: 1. Reduce waste so it doesn't exist in the first place; 2. Re-use; 3. Recycle what can't be re-used; 4. Dispose of the small amount left in as environmentally friendly a manner as possible; 5. Meeting the needs of the people of Leeds and environmental considerations rather than Government Targets. (This will meet Government Targets, but in a more population friendly manner). Needs emphasis on waste reduction. Re-use waste, if at all possible. Evaluate means of re-using waste. Re-establish areas at council re-cycling depots where re-usable items can be placed

	<p>for others to take.</p> <ul style="list-style-type: none"> • Properly evaluate means to prevent the mountain of re-usable items going to landfill at student changeover times (June July August). • Investigate other means of reducing waste including packaging (work with retailers especially supermarkets – packaging used should be recyclable – by persuasion and penalties). • Investigate ‘Best practice’ methods of recycling – co-mingled waste is almost certainly not best practice. Glass should not be added to co-mingled waste – this practice in other authorities has reduced the glass recycling rate from 96% to 48% (recent report). The Green Bin system just isn’t working generally – in student areas at least a large percentage of the Green Bin waste goes to landfill (in normal weeks when some of it is contaminated, and at busy times e.g. holiday periods and at student changeover when, to cope with the volume, all the waste is taken by the same bin lorry and contents of black and green bins mixed indiscriminately and sent to landfill). • Investigation and strong promotion of personal recycling is needed. Composting needs encouragement with advice and help with obtaining suitable composters. Removing messy waste (food and garden) will stop the contamination of loads which results in otherwise recyclable loads being sent to landfill. • Methods of encouragement of re-use and recycling need investigation. Also investigation of best methods of promoting re-use and recycling, and what penalties might work. Maybe involvement of school children with projects. Television soaps etc. could to be encouraged to promote good practice. Need innovative promotion. • Any method employed to deal with waste locally must be environmentally friendly to the people in the area. Likely to rule out incinerators / energy from waste by incineration. Areas which have used incinerators except in industrial settings (as on Teesside) have found them unsatisfactory because of issues like air pollution (asthma etc), need to dispose of resultant toxic waste, temptation or need to ‘feed’ them to keep them fully functioning meaning that items which could be re-used or recycled end up in the incinerator, etc. Authorities like Newcastle have shut theirs down because of such problems. Incinerators are expensive to install, consultation periods tend to be long and expensive, and after installation incinerators have a fixed capacity. Heat from waste by incineration sounds great – in reality it has all the problems of incineration, including the need to feed the incinerator to provide the agreed amount of power, also the materials which arrive to be incinerated aren’t conducive to generating a regular and controllable power supply etc. and can be a real nightmare. Again cities like Newcastle have tried and abandoned power from waste by incineration. Leeds could end up with an expensive nightmare if it tries the incineration route. • Alternatives such as MBT (mechanical-biological waste treatment) should be investigated – MBT is cheap and relatively quick to set up, size of plant can much more easily be related to the volume of waste.
<p>Stakeholder E: Highways Agency</p>	<ul style="list-style-type: none"> • Issue 2 - The Highways Agency would not like to specifically comment on this issue. However, the potential impact of transportation of waste on the strategic road network should be considered while drafting policies about strategic waste management. • Issue 3 - The impact of waste management on SRN depends upon the proximity and location of sites with respect to the SRN. The policies regarding the location principles for facilities are likely to determine the impact on the strategic road network, and therefore they are of critical interest to the Highways Agency. Option 1: Concentrated Distribution of Waste Facilities is likely to lead to large volumes of waste being transported over a greater distance. This might have a significant impact on the SRN depending on the location of the facilities; Option 2: dispersed distribution of Waste Facilities would ideally reduce the need to move waste over larger distances via the strategic road network, in practice smaller facilities may be restricted to a single waste stream and result in different waste streams being carried further to an appropriate site. The Highways Agency would not like to comment specifically on these options unless more detailed information is available about the location of waste management sites.

	<ul style="list-style-type: none"> Issue 5 - Option 1 and Option 2, these options would only be relevant to the Agency if the identified/proposed sites are close to the strategic road network. Hence, the Agency would not like to comment on the issues at this stage but would like to be consulted when specific sites have been identified.
Stakeholder J: Lafarge Aggregates Ltd	<ul style="list-style-type: none"> Issue 1 (Key themes) - in respect of waste, the theme needs to recognise that since landfill can by definition predominantly take place in an existing void that in order to encourage landfill in other areas of Leeds then positive support for such alterations should be provided. Issue 2 - waste management facilities should take into account of the regional situation whilst having regard to the proximity principle. Option 2 should be supported. Issues 3 and 4 - support the flexible approach in option 2 for waste transfer, and option 2 for other locational considerations. Issue 5 - Option 1 is to be preferred. Landfill is consistent with the temporary land use associated with mineral workings and can take account of existing infrastructure on established sites (including access, water management etc). In addition, importation of waste materials can, in certain circumstances, help to achieve (either in whole or part) a beneficial after use of a mineral working whilst enabling full exploitation of mineral reserves. Option 2 is also acceptable being less precise and would enable all potential landfill void space to be exploited. Option 3 is unacceptable in all terms; it is imprecise and may prevent suitable and environmentally acceptable facilities becoming available to meet the plan's requirements. Issue 7 - Support option 1, a site put forward and allocated should be on the assumption that the use proposed is in accordance with the development plan and consent should therefore be expected to be granted, provided that the waste management requirements of the Authority can be met throughout the plan period.
Stakeholder K: Cairn Bardon Ltd and Aggregate Industries Ltd	<ul style="list-style-type: none"> Residual waste should be located in waste management facilities beside active landfill (look at Lancashire, North Yorkshire for examples). There is a political reluctance to work in conjunction with adjacent Local Authorities which needs to be overcome. Tendering for waste facilities is occurring at the same time as Wakefield. Leeds has a history of insular planning, and there is a rivalry between Leeds and Wakefield. Any perceived 'bad neighbour' development should be located beside Cross Green. Concern over unrealistic aspiration i.e. the 'zero waste' target. Material should be fit for restoration at best. Need a flexible approach to waste management sites. The Core Strategy is miles behind the DPD (2011 compared to DPD adoption in 2010) and it doesn't address minerals and waste as fully as the DPD. There is a lack of communication between planning and waste management. Combined heat and Power (CHP) was a Preferred Option but now everybody has taken a step back from this. Politicians are going to hang back, wait on tender process then make decisions based on this.

Table B.4 External Stakeholder Responses: Waste

Internal Stakeholders

Table B.5 presents a summary of Waste responses from Internal Stakeholders, received in letter or email format.

Waste	
Stakeholder L: Leeds City Council	<ul style="list-style-type: none"> "Policies should ensure that adequate sites and facilities are available to manage the quantities of municipal, commercial and industrial, construction and demolition, agricultural, and hazardous waste" - I agree but define "adequate" and the type and extent of a facility. "Policies should ensure that waste is managed on the site where it arises, or at the nearest appropriate location" - I disagree - this depends on what the waste arising is – it should then be managed at the nearest suitable site - this implies a hierarchy of sites with some form of grading of

	<p>capability. 2 premier sites in Leeds, 8 first div and 30 second Div (waste transfer).</p> <ul style="list-style-type: none"> • Policies should ensure that facilities are located in accordance with the Core Approach and the proposed distribution of housing and economic growth - assuming the Core Strategy is adopted at the time, and what about sites that have been developed prior to this DPD or the Core Strategy? • "Policies should seek to redress the concentration of existing and prospective landfill operations in South Leeds" - can this really be a criteria? • Leeds has an adopted Integrated Waste Strategy which sets out an approach to the Municipal Waste Stream. What of commercial waste, which makes up 90% of the waste streams? The Waste Strategy has a long term aspiration to reduce waste to the point where no residual waste remains: 'A zero waste city, whereby we reduce, re-use, recycle and recover value from all waste, waste becomes a resource and no waste is sent to landfill' (Integrated Waste Strategy for Leeds 2005-2035). • The NRWDPD shall also have regard to the principles of the Waste Hierarchy, which is shown in Figure 9. It must also be consistent with waste policies contained in National Planning Guidance provided by Planning Policy Statement 10 and the Regional Spatial Strategy. • The Council realises that there are a variety of positive opportunities arising from where waste is generated and more must be done to encourage and facilitate sustainable management of all waste streams. It is intended that options for facilities will be examined through the process of preparing the NRWDPD. In addition to promoting sites specifically for waste management, the NRWDPD will address requirements - how? - For all new forms of development in relation to their waste management responsibilities. National and regional planning policy advocates the treatment of waste as close as possible to its source of production. • The NRWDPD can contain criteria based policies - it can but it can only be implemented if sites are "available" for assessing new development particularly in relation to re-use and recycling. Options for considering inputs to other relevant DPDs, as policy drivers in relation to this matter will also be considered e.g. new requirements on developments or developers of major proposals within the City.
<p>Stakeholder M: Leeds City Council</p>	<ul style="list-style-type: none"> • The following link has a video which I believe shows where Leeds should be aiming (http://www.swedishbiogasint.com/page/press_news_download.htm). The process shows animal waste - but basically it works with anything that "rots". I also believe we should start with the Bin Wagons instead of buses.

Table B.5 Internal Stakeholder Responses: Waste

General Public

Table B.6 presents a summary of Waste responses from members of the public, received in letter or email format.

Waste	
<p>General Public B: Leeds City Centre Resident</p>	<ul style="list-style-type: none"> • Incineration doesn't get rid of waste. It simply converts it into a smaller amount of waste some of which is toxic. That's why the council should be opting for a more environmentally friendly alternative to incineration such as MBT (mechanical-biological waste treatment). MBT is an efficient and relatively cheap automated waste separation system which can re-cycle waste and compost what's left. Unlike an incinerator it could be up and running quickly, and so there'd be no fines to pay. It can also be built in stages so that the amount of waste can be matched to the size of the plant. This isn't economic with an incinerator which has to be built to accommodate the peaks in waste production that are likely to occur over the lifetime of the incinerator. • Another reason to be concerned about an incinerator being built is that the council would then have no incentive to reduce the amount of waste

	<p>currently produced. That's because they'd have to sign a contract that would require the burning of a certain minimum amount of waste for a fixed number of years. More flexible contracts might be possible but are much less attractive to the plant operators. If the city started to produce less waste than was necessary to fulfil the terms of a fixed contract, it would have to start importing waste from other areas.</p> <ul style="list-style-type: none"> • Leeds should not become the dumping ground for other cities' waste. Rather than allow that to happen, it would be better for the council to abandon its plans to build an incinerator now before spending another penny of our money on it, and opt instead for a scheme aimed at making Leeds a zero waste city we can be proud of. The alternatives to incineration are well known and commercially available.
<p>General Public A: Headingley Resident</p>	<ul style="list-style-type: none"> • No to incinerators or heat from waste by incineration. Objectives should be: 1. Reduce waste so it doesn't exist in the first place; 2. Re-use 3. Recycle what can't be re-used; 4. Dispose of the small amount left in as environmentally friendly a manner as possible; 5. Meeting the needs of the people of Leeds and environmental considerations rather than Government Targets. (This will meet Government Targets, but in a more population friendly manner). • There should be an emphasis on waste reduction. Waste should always be re-used first where this is possible. Means of re-using waste should be evaluated, including investigating again the possibility of areas at Council re-cycling depots where people can leave useable items for others to take. In particular, there must be better means to prevent so many useable items going to landfill at student changeover times (this is happening again this year, despite promises, though the rubbish on the streets is dramatically improved this year). Other means of reducing waste should be investigated, including working with supermarkets etc on packaging; packaging should be minimised and packaging which is used should be recyclable with a tax on manufacturers who use non-recyclable packaging. • Best practice methods of recycling should be investigated – mixed waste is almost certainly not best practice. It would be a shame if glass is added to mixed recyclables – since other authorities have done this the % of glass recycled has reduced from 96% to 48% (recent report). • The Green bin system just isn't working especially in student areas. It might meet government targets if bins are weighed at the point of tipping into the bin lorry, but as so many green bin loads subsequently end up in landfill (either unintentionally because a load gets contaminated, or intentionally when both black and green bin loads are put in the same lorry at peak times) it means that lots of carefully collected recyclables simply end up in landfill (can be as high as 10 out of 12 loads of 'recyclables' are sent to landfill). • Personal recycling should be investigated and strongly promoted – including composting. People need advice as to what kind of waste can be composted, and help with composters. Removing food and garden waste from general waste will greatly reduce contamination and enable more to be recycled. • Means of encouragement of re-use and recycling should be investigated – including active promotion by publicity (this can be done nationally in co-operation with other authorities as with the no smoking campaign) and penalties. • Any method employed to deal with waste locally must be environmentally friendly to people in the area. This is likely to rule out incinerators / energy from waste by incineration. Other areas which have used incinerators except in industrial settings (as on Teesside) have found them unsatisfactory because of issues like air pollution (asthma etc), need to dispose of the toxic waste left, need to continually feed them as they need to be stopped from 'going out' meaning that items which could be re-used or recycled end up in the incinerator, etc. Authorities like Newcastle have shut theirs down because of such problems. Incinerators are expensive to install, consultation periods tend to be long and expensive, and after installation incinerators have a fixed capacity. Heat from waste by incineration sounds great – in reality it has all the problems of incineration, including the need to feed the incinerator to provide the agreed amount of power, also the materials which arrive to be incinerated

	<p>aren't conducive to generating a regular and controllable power supply etc. and can be a real nightmare. Again cities like Newcastle have tried and abandoned power from waste by incineration. Leeds could end up with an expensive nightmare if it tries the incineration route.</p> <ul style="list-style-type: none"> • Alternatives such as MBT (mechanical-biological waste treatment) should be investigated – MBT is cheap and relatively quick to set up, size of plant can much more easily be related to the volume of waste
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Table B.6 General Public Responses: Waste

Minerals and Aggregates

External Stakeholders

Table B.7 presents a summary of Minerals and Aggregates responses from External Stakeholders, received in letter or email format.

Minerals and Aggregates	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> • Issue 8 - Leeds should aim to drastically increase aggregate reuse and recycling in order to meet its aggregate needs, a policy to encourage sustainable landscaping and construction materials is needed to reduce unsustainable demands on our aggregate resources. The assumption that market demand for aggregates will stay high holds true only if unnecessary and unsustainable consumption of aggregates continues. • Issue 9 - Define 'necessary'- much of the market demand for sand and gravel is not necessary or sustainable. A criteria based approach may be the best way of ensuring suitable sites are not overlooked but the criteria would need to be very detailed to ensure sustainable extraction of sand and gravel. • Issue 10 - I like the sound of criteria based policy approaches as they do not lock decision makers into a site-based approach that might mean new more sustainable sites not identified previously would be overlooked in favour of less suitable sites. Criteria must lead to the most sustainable options being developed. • Issue 11 - Option 1. YES. Option 2. PROBABLY. Option 3. NO. Do not focus on maintaining extraction at present rates as the present rate of extraction is unsustainable. Reduce extraction rates to meet 'need' not 'demand'. • Issue 12 - I am unclear: Will future extraction take place within the district if the current situation (no policies in DPDs) continues? If yes, we need criteria to ensure policies enforce extraction operations to minimise negative impacts including noise, PM10 particles, other pollution, transport impacts etc. Again I favour a criteria based approach but ONLY if the criteria lead to more sustainable use of crushed rock. • Issue 13 - Option 1. YES. But don't exclude land uses that are more sustainable than developing building stone quarries (or desirable) for the MCA/ Leeds as a whole. • Option 2. NOT NECESSARILY. If extending the quarry is more sustainable than opening a new one then yes. If extending the quarry is less sustainable than opening a new one then no. • Option 3. Yes but only if permitting new quarries means the negative environmental and social impacts of using local building stone will be less than the negative environmental and social impacts of using imported stone. • Issue 14 - Option 1. YES. Coal is not a sustainable resource. We need to develop other sources of energy rather than extracting more coal. Perhaps criteria could be developed that ensure future exploitation offsets the need to exploit even less sustainable sources of energy (such as lower quality coal deposits outside the LCC boundary) elsewhere but I doubt this would actually lead to a more efficient use of our energy resources. • Issue 15 - Option 1: I don't understand; "or use only in future", Option 2:

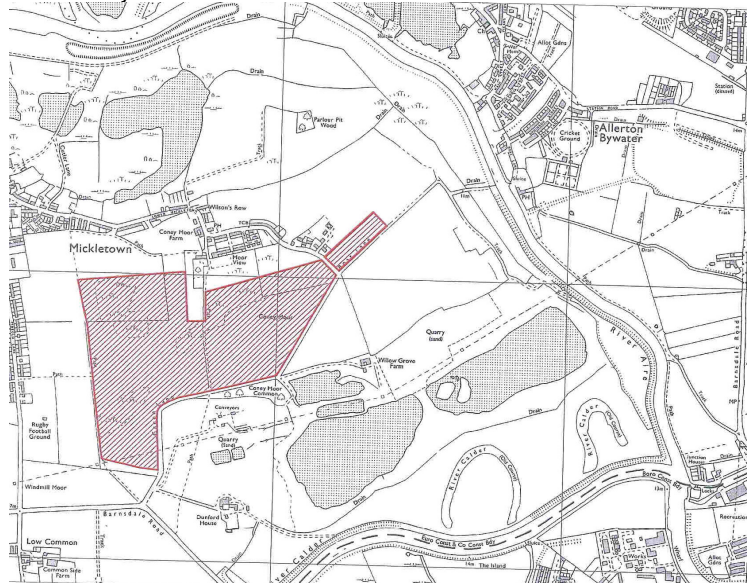
	<p>there may be a 'demand' for new facilities but if more sustainable construction materials and practices were used then the 'demand' would reduce. 'Need' is not the same as 'demand'. Do not acknowledge 'need' but acknowledge 'demand'. Other than (very important) semantics I agree. Option 3: Agree.</p> <ul style="list-style-type: none"> • Issue 17 - Do not understand. Why should backfilling be restricted? Are there more sustainable uses for the waste types mentioned? What does 'restoration at lower levels' mean? Option 3: NO. Enforce the most sustainable option the most economic option might not be the most environmentally sustainable option and may have more negative impacts. • Issue 18 - Option 1 – A priority for the promotion of biodiversity. YES. Option 2 – A priority for woodland establishment. YES. Native woodland with good biodiversity and edible planting (forest garden). Option 3 – A priority for the protection of valuable soil resources YES. Soil should be managed sustainably and organically. Option 4 – A priority for leisure and recreation after uses. YES. Leisure and recreation that is compatible with nature (e.g. walking, cycling, wildlife watching, nature reserves, sailing, organic allotments, forest gardens, outdoor education centres) • Option 5 – Guidance on other possible after uses, including disposal of residual waste following thermal treatment. YES. The guidance should ensure that sites are managed sustainably. Option 6 – Other open use YES. If appropriate and serves needs of communities and city in a sustainable way. Option 7 – All of the above YES. Provide functional spaces for people (leisure, recreation, food growing, green infrastructure) and wildlife (habitat, woodland, soil). Green Infrastructure is multi-functional and provides services for people and wildlife there is no need to rank the options if a holistic approach to after use is taken. • Issue 19 - Option 1: Agree. It seems to me that this will lead to better management of sites restored to nature conservation. Option 2: Agree: IF long term means longer than 10 years. Option 3: Disagree. 5 year management period is too short and could mean longer term problems caused by the previous land use are not remedied.
<p>Stakeholder I: Friends of the Earth</p>	<ul style="list-style-type: none"> • Issue 8 - Option 1 – A continuation of the 2001 – 2016 trends should be accepted as the basis of future aggregate provision. Thorough analysis should be made into whether the 2001-16 trends will have an impact on the National Parks and AONB or not. It should be an absolute guideline that such sites are not allowed to have expansion of mineral extraction from them. • Issue 14 - Option 1 – Simply acknowledge the presence of the coal reserve and continue with the existing approach set out in saved policies. It should be recognised that coal is a fossil fuel and, as such, when burnt contributes to climate change. It is unlikely that appropriate carbon capture and storage technologies will be available in the immediate future to allow coal to be burnt without this impact. Friends of the Earth is encouraging the UK Government to make a step change in its adoption of renewable energy systems and it is unlikely that coal will continue to play such a prominent part in the UK energy mix. • Issue 18 - Friends of the Earth does not support the thermal treatment of waste unless found to absolutely necessary for environmental and health grounds.
<p>Stakeholder B: South Headingley Community Association</p>	<ul style="list-style-type: none"> • No to exploitation of resources in the areas where people live. K100Again objectives should be: 1. Re-use; 2. Exploit only in a manner which is environmentally and community friendly (with attention to problems resultant to transport of materials through streets where people live); 3. Meet the needs of the people of Leeds, including environmental needs, rather than being Government target led.
<p>Stakeholder C: The Coal Authority</p>	<ul style="list-style-type: none"> • Issue 14 - It is noted that there is currently a presumption against surface mining development unless the tests set out in Minerals Planning Guidance 3 (MPG3, 1999) are met. • Issue 14 - Coal is an important energy mineral which should be included within the Leeds LDF portfolio. The Coal Authority would wish to ensure that coal in particular is not needlessly sterilised and indeed a more proactive approach is taken. • Issue 14 - The Coal Authority would support Option 2 in that it allows a greater degree of certainty for plan users, including the public and the

	<p>minerals industry for future surface mining areas.</p> <ul style="list-style-type: none"> • Issue 14 - The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence damage claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues and provide information on mining. The Coal Authority owns the coal on behalf of state and as such has a statutory duty to promote coal. The Coal Authority therefore believes that the coal supply in Britain should contain a significant proportion of indigenous production and the electricity generators made similar statements in their submissions to the 2006 Energy Review. Coal supplied from within Britain offers security against the volatility of international coal prices, freight rates, exchange rates and a reliance on port capacity. It should be recognised that the importation of coal from many thousands of miles away has its own environmental footprint by way of increased transport related carbon and sulphur emissions. The carbon footprint of indigenously produced coal is materially less than imported coal. The Energy Review recognised the importance of indigenous energy resources with the statement that "...the Government believes that it is right to make the best use of UK energy resources, including coal reserves, where it is economically viable and environmentally acceptable to do so..." • Issue 14 - In addition Minerals Policy Statement 1 (MPS1, 2006) states that there should be the "...aim to source mineral supplies indigenously, to avoid exporting potential environmental damage, whilst recognising the primary role that market conditions play;..." More recently, The Energy White Paper further continues on this theme which reinforces this approach by stating that "...the Government believes that these factors reflect a value in maintaining access to economically recoverable reserves of coal..." • Issue 18 - The Coal Authority wishes to make a general comment that the ground conditions and land stability should be a significant consideration in decision making on restoration schemes irrespective of the after use to ensure future public safety. • Issue 20 - The Coal Authority would be seeking to support Option 5 in that it is important that the UK and its individual settlements have the ability to have a combination of energy sources to draw from. The over reliance upon one energy source or the desire to be seen to be supporting some forms of energy more than others will not lead to balanced energy portfolio. Fossil fuel technology has been improving and therefore it is not necessarily the case that emissions targets will not be met through usage of fossil fuels.
<p>Stakeholder N: British Waterways</p>	<ul style="list-style-type: none"> • Issue 18 - Option 4 We support and encourage new facilities and accommodation for tourists, especially in relation to the waterways. Old mineral sites and quarries adjacent to the waterway can be adapted to provide boating facilities, including marinas and mooring facilities. The Yorkshire and Humber Regional Spatial Strategy recognises the importance that waterways can make to tourism and the economy. Policy E6 (Sustainable Tourism) places an emphasis on 'promoting tourism and associated development of an appropriate scale and type along waterways in both urban and rural areas.' The network of inland waterways has an inherent constraint of being a "non footloose" asset, i.e. its location and alignment is fixed, and therefore it requires essential supporting infrastructure, facilities and attractions along its corridor. These essential facilities could include marinas, mooring facilities, service facilities, local tourism attractions etc. Without these facilities, the network will be unable to fully realise the tourism, leisure and recreation benefits that could be generated for the local community, or attract leisure visitors from outside Leeds.
<p>Stakeholder E: Highways Agency</p>	<ul style="list-style-type: none"> • Issue 9 - Option 1 and Option 2, these options would only be relevant to the Agency if the identified/proposed sites are close to the strategic road network. Hence, the Agency would not like to comment on the issues at this stage but would like to be consulted when specific sites have been identified. • Issue 15 - Option 1 and Option 2, these options would only be of the Agency's interest if the identified/proposed sites are close to the strategic

	<p>road network. Hence, the Agency would not like to comment on the issues at this stage but would like to be consulted when specific sites have been identified. Option 3- Yes. There should be policy guidance on appropriate location of concrete batching and asphalt facilities.</p> <ul style="list-style-type: none"> Issue 16 - Option 1, 2 and 3. The location of aggregate recycling facilities is a matter of the Agency's interest. However, the Agency would only be interested in a particular site if it is in close proximity to the strategic road network or might have a considerable impact on the same. Hence, the Agency would not directly comment on these options but would like to be consulted when specific sites have been identified. Option 3- Yes. The Agency recognises that there is a growing need for building material due to the widespread construction activity in Leeds. In order to minimise the import of building material, recycling initiatives should be encouraged. There should be policy guidance on appropriate location of aggregate recycling facilities.
<p>Stakeholder F: CoalPro</p>	<ul style="list-style-type: none"> Issue 14 - With respect to issue 14, neither option is acceptable. The preamble to the Options in issue 14 states that in view of national guidance on opencast coal development, the Council applies a presumption against proposed development unless the proposal can demonstrate clear beneficial effects. This is an incorrect interpretation of national guidance. Paragraph 8 of MPG3 states that "there should normally be a presumption against development unless the proposal meets the following tests: i) is the proposal environmentally acceptable, or can it be made so by planning conditions or obligations? ii) if not, does it provide local or community benefits which clearly outweigh the likely impacts to justify the grant of planning permission?" It follows from this that tests should be applied sequentially and not in combination. First, if the proposal is environmentally acceptable then it should be approved. It is not necessary to demonstrate clear beneficial effects. Second, if the proposal as submitted is not environmentally acceptable, consideration should be given, in discussion with the applicant, as to whether it can be made so by planning conditions or obligations. Third, if, and only if, the proposal is not environmentally acceptable or cannot be made so, should the test of whether the benefits outweigh the impacts be applied. It is not acceptable to select either Option 1 or Option 2. The overall policy should be set out, amended as above. To summarise, the DPD should include a general policy with respect to surface coal mining which correctly applies Government guidance as set out in MPG3. Issue 14 - In addition, a Mineral Consultation Area should be established which covers the whole of the shallow coalfield. Information provided by or shortly to be provided by, the Coal Authority will enable this to be done. To summarise, the DPD should also define a surface coal Mineral Consultation Area within which the above amended policy can be applied. There should also be a suitable policy designed to avoid sterilisation as set out in Government guidance.
<p>Stakeholder J: Lafarge Aggregates Ltd</p>	<ul style="list-style-type: none"> Issue 1 (Key themes) - a minerals and aggregates safeguarding policy is welcomed but the wording of any policy should be such so as to encourage the full recovery of all available mineral reserve in any scheme (or prior to alternative development) so that sterilisation of reserves by partial working of a site does not occur. Alternatives in respect of recycling or secondary aggregates should be supported where such a land use exists in an appropriate location (such as, but not limited to, an active mineral working or waste disposal installation) and where other policy conflicts are identified (such as landscape/greenbelt designation) then temporary consents for such developments should be supported as appropriate. In addition, the criteria for land-banks should be consistent with the advice contained in national Planning Policy and relate to all aggregate minerals not just nationally and regionally significant minerals (MPS1 Annex 1, paras 4.1 - 4.5). In terms of the inter-relationship between minerals and other key themes the following points are of relevance and should be expanded: Climate Change - the availability of minerals within Leeds is not considered likely to be affected by or contribute to coastal erosion during the plan period, in addition the provision of significant tree planting and sympathetic restoration schemes can offer positive benefits and reduce the carbon footprint of minerals and other development. Land use - mineral extraction

is a temporary land use. Water resources - with effective site management mineral sites do not necessarily increase sediment levels in water resources. In addition, water based (either in full or as part of a wider scheme) restoration provides a positive opportunity to enhance biodiversity. Air quality - see climate change notes above. In addition, impacts on air quality as a result of fugitive dust emissions can be adequately controlled by effective management and adoption of best practice techniques. Waste - in respect of waste a similar inter-relationship applies in terms of temporary land uses, the ability by site design and restoration planning to reduce a development's carbon footprint and the positive role energy recovery from waste has to play on reducing energy consumption.

- Issue 8 - Option 2 should be the preferred course of action, provided sites allocated can provide sufficient material of appropriate quality. The company has the potential site of Coney Moor (Methley extension) which is proven to provide a reserve of 3.2 million tonnes of sand and gravel that could be worked over a 10-15 year period. This will help achieve the reduction of reliance on the imports available from outside the plan area. In addition, the site will contribute towards the land-bank requirements throughout and towards the end of the plan period.
- Issue 9 - Option 1 is a satisfactory method for addressing the necessary aggregate provision in the plan period within the Authority. The identified site at Coney Moor (Methley extension) detailed above is considered sufficient to address issue 9.
- Issue 10 - Option 3 represents the most efficient and certain mechanism to securing future areas of sand and gravel working. By reference to plan 1 attached a potential 3.2m tonne reserve at Coney Moor (Methley extension) has been identified that in addition to addressing shortfall in sand and gravel over the plan period development of this site could also enable a significant flood storage and flood attenuation scheme to be devised and implemented. Where appropriate, a sequential policy should be provided that identifies an individual site first, an Area of Search second, and then provide for future development outside of these areas if necessary.



- Issue 15 - Concrete batching: option 2 should be supported as this provides the most flexible approach to providing such facilities in the future. In respect of option 3, regard needs to be given to the ability of the GPDO 1995 (Pas 8 and 19 etc) that allow related land uses to take place without the need for planning permission. Option 3 should not be used so as to exclude other potential development sites that do not fall into the categories specified, but are acceptable in all other aspects.
- Issue 16 - all 4 options are generally acceptable however option 2 needs

	<p>to be expanded by the words 'where appropriate' at the end. Option 3 needs to reflect the point that recycling sites require a generally large (0.5ha) level site with good access, which may not be available within established industrial areas.</p> <ul style="list-style-type: none"> • Issue 17 - All options are acceptable in general terms. In order to achieve the objective of issue 17, the waste hierarchy needs to be considered in that waste minimisation, reuse and recycling should be used as positive instruments. Infilling of former mineral workings can have significant environmental benefits and at the same time ensure that known mineral resources are capable of full exploitation. Of all options, only option 3 can be favoured and only if the requirements of the waste hierarchy are met. • Issue 18 - All options are of relevance, but dependant on site specific circumstances. The working of minerals within flood plains may offer a positive benefit in terms of flood attenuation schemes and this does not appear in the list. It is not considered possible or appropriate to rank the various options in any order of preference. • Issue 19 - Whereas the preferred option would be option 2 (most favoured), option 1 and option 3 (least favoured), it is of fundamental importance to consider a site's specific location and circumstances. Options 1 and 3 may be adequate to deliver an acceptable after-use management. • Issue 39 - Option 1 is the most practicable and reflects the current situation for minerals transport. Whilst alternative modes of transport (as outlined in option 2) are desirable, not all mineral sites have access to the infrastructure necessary for rail/water transport. The development of new facilities requires significant expenditure that can generally only be justified by long term/large mineral reserve sites, and where the mineral concerned is required to travel significant distances. In addition a key point of minerals transport is from point of production (e.g. quarry or aggregates railhead/wharf) to the point of demand/end use for which road transport in most cases is the only practicable option, as there is generally a lack of suitable infrastructure at the receiver and loads are generally small and variable.
<p>Stakeholder K: Cairn Bardon Ltd and Aggregate Industries Ltd</p>	<ul style="list-style-type: none"> • The second phase Sand and Gravel Study (as part of the Regional Spatial Strategy) identifies West Yorkshire as a hub for sand and gravel; however geological resources are not taken into account. Suggest that Leeds City Council need to undertake a proper analysis of geology before making any plans. Taking BGS (British Geological Survey) data is not comprehensive enough. • Peckfield has historically been the principal provider of aggregates in the Leeds area, but only has a few months left. New sites for mineral extraction need to be proposed even though this is contentious and will raise opposition. Two sites have been identified next to Peckfield Quarry (Warren House and Warren Farm). • Should we be sterilising local resources <i>or</i> extracting some then level and use for development? • The RSS should have dealt with site specific strategic policy. The Biffa site is out of space. Peckfield landfill site has 3.7 million of the 4.2 million void space left in Leeds. • The inspectorate will be looking for a credible and sound evidence base. This is lacking; Leeds need to gather data, without which no developments can take place. At the ready-mix plant in Cross Green aggregates from Peterborough and Ripon City Quarry are being used. As part of the mapping, a plan of where they are coming from needs to be developed. • LDF documents should provide some site specific allocations, which is asking Leeds City Council to 'bite the bullet' and acknowledge some sites. Possible sites and mineral flows should be mapped.

Table B.7 External Stakeholder Responses: Minerals and Aggregates

Internal Stakeholders

There were no comments relating to Minerals and Aggregates from Internal Stakeholders.

General Public

Table B.8 presents a summary of Minerals and Aggregates responses from members of the public, received in letter or email format.

Minerals and Aggregates	
General Public A: Headingley Resident	<ul style="list-style-type: none"> No to exploitation of resources in the areas where people live. Again objectives should be: 1. Re-use; 2. Exploit only in a manner which is environmentally and community friendly (with attention to problems resultant to transport of materials through streets where people live); 3. Meet the needs of the people of Leeds, including environmental needs, rather than being Government target led.

Table B.8 General Public Responses: Minerals and Aggregates

Land Use

External Stakeholders

Table B.9 presents a summary of Land Use responses from External Stakeholders, received in letter or email format.

Land Use	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> Issue 31 - Tricky. I can see why it is good to incentivise the regeneration of contaminated land. Removing planning obligations presents major concerns for me as planning obligations are necessary and help ensure developments reduce their negative impacts and impact more positively on surrounding communities than they would have done in the absence of conditions. Prioritising planning applications also presents a problem because if they are sped-through the system then this leaves fewer opportunities for stakeholders to comment and bring material considerations to the attention of the committee/ officer. Can't say yes or no. Depends on a site by site basis: will sustainable/ beneficial regeneration occur without incentives? Will incentives mean less suitable developments are permitted? etc.
Stakeholder I: Friends of the Earth	<ul style="list-style-type: none"> Issue 31 - The development of brownfield sites should be a priority for Leeds City Council. Where these brownfield sites require remediation then this should be carried out, wherever possible, by the originator of the contamination. However, the removal of appropriate planning obligations should be avoided as these obligations ensure social and environmental benefit for communities adversely affected by development.
Stakeholder B: South Headingley Community Association	<ul style="list-style-type: none"> Public and other green space needs absolute protection. Once gone, it will never be replaced. Open space is what makes urban environments pleasant to live in. Gardens and green space benefit the environment in many other ways, including protection from flooding by allowing drainage of surface water, and should be actively promoted. Hard surfacing of existing gardens and green space should be actively discouraged, and provision of more encouraged. Especially in Central wards – Leeds has only one inner city park, Woodhouse Moor, which must be protected absolutely. Further land must not be taken for transport use; trolley buses which run on existing roads should be promoted, tramways which require further land snatch and divide communities should not be countenanced. Grass and tree-lined verges along roads should be protected and more established to make walking and cycling a more positive experience. Active transport (bicycles and walking) should be actively promoted, with establishment of a pleasant streetscape, reversing current policies to consider only the needs of motor vehicles.
Stakeholder C:	<ul style="list-style-type: none"> Issue 31 - The Coal Authority would support the regeneration and

The Coal Authority	remediation of contaminated land. The remediation process offers the opportunity to assess ground conditions and any instability issues which can potentially cause public safety hazards in the future.
Stakeholder D: Leeds Local Access Forum	<ul style="list-style-type: none"> Issue 31 - Yes, The LLAF agrees with the supporting text at paragraph 5.5.
Stakeholder J: Lafarge Aggregates Ltd	<ul style="list-style-type: none"> Issue 1 (key themes) - in respect of land use, these should recognise the positive role mineral extraction has to play in the provision of flood attenuation schemes. Where a development scheme associated with mineral extraction can offer benefits in terms of flood storage or flood attenuation then such a proposal should receive positive policy support. Mineral extraction within floodplains can be appropriate, as there can be an increase in flood storage capacity.

Table B.9 External Stakeholder Responses: Land Use

Internal Stakeholders

Table B.10 presents a summary of Land Use responses from Internal Stakeholders, received in letter or email format.

Land Use	
Stakeholder L: Leeds City Council	<ul style="list-style-type: none"> Policies in this DPD should identify drainage capacity and associated flood risk alongside creating new development opportunity - a drainage strategy and a flood risk assessment are not part of this DPD and any policies included should not prejudice other DPDs. Policies should encourage the active increase of the woodland resource for both biodiversity reasons and to assist in reducing flood risk. Policies should include locational guidance for new development to encourage use of more energy efficient transport - locational guidance for development is dependant on many things - some planning and some commercial and some environmental and some relate to sustainable forms of development and transport options - THIS DPD will have to feed into that debate where land use planning has not already been established. The re-use of contaminated land should be encouraged to minimise the use of the land-resource - need to add in the need for funding to make such sites viable - some incentives relating to tax benefits are some times appropriate. Policies should protect the greenbelt and greenfield land - other polices do that. The use of brownfield land should continue to be encouraged.

Table B.10 Internal Stakeholder Responses: Land Use

General Public

Table B.11 presents a summary of Land Use responses from members of the public, received in letter or email format.

Land Use	
General Public A: Headingley Resident	<ul style="list-style-type: none"> Public and other green space must be given protection. Once gone, it will never be replaced. Open space is what makes urban environments pleasant to live in. Gardens and greenspace benefit the environment in many other ways, including protection from flooding by allowing drainage of surface water, and should be actively promoted. Hard surfacing of existing gardens and greenspace should be actively discouraged, and provision of more encouraged. Especially in Central wards – Leeds has only one inner city park, Woodhouse Moor, which must be protected absolutely. Further land must not be taken for transport use; trolley buses which run on existing roads should be promoted, tramways which require further land snatch and divide communities should not be countenanced. Grass and tree lined verges along roads should be protected and more installed. Active transport (bicycles and walking) should be actively

	promoted, with establishment of a pleasant streetscape, reversing current policies to consider only the needs of motor vehicles.
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Table B.11 General Public Responses: Land Use

Energy and Climate Change

External Stakeholders

Table B.12 presents a summary of Energy and Climate Change responses from External Stakeholders, received in letter or email format.

Energy and Climate Change	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> • Reducing energy demand (retro fit insulation, passive solar gain as a requirement where possible in new build, owners cannot so easily remove, have been examples of eco home buyers striping out or just not operating the kit) • Energy from digester for organic waste, not primarily burning potential recyclables • Issue 20 - Fossil Fuels have only been the 'traditional' method of energy production since the late industrial revolution; petroleum has only been in widespread use sine the 1940s. For most of human history we relied on biomass for heating, lighting and cooking and on wind, animal power and micro hydro for mechanical (kinetic) work. We should cut out dependence on fossil fuels wherever the opportunity presents itself. Option 1: Yes. ½. Option 2: Yes. ½. Option 3: No. No nuclear energy. Renewable energy is what we need. What are the 'other' sources? Option 4: No. Option 5: A combination of wind, micro hydro, solar PV, solar heating, ground source heat pumps, geothermal energy (if applicable), biomass (sustainably managed/ waste biomass) and other renewable technologies. Decentralised energy production and transmission (on site microgeneration and CHP schemes), large scale generation as appropriate. • Issue 22 - All are viable in my opinion. Hydropower may be less viable because of the topography and hydrology of Leeds. Micro hydro is still a possibility, particularly on existing weirs and where it can be combined with a fish pass to benefit biodiversity and provide leisure and recreation benefits. Landfill gas use may make landfill more economically viable and undermine diversion of organic (green) and food waste from landfill. EfW may undermine elimination of recyclable waste from the residual stream because the incinerator has a minimum feed requirement in order to operate. If the minimum feed is not met biomass could substitute waste which is no longer entering the residual stream- this is not sustainable and EfW is only 1 step up the waste hierarchy from landfill. • Issue 22 cont - I am unsure about the potential for Geothermal but wind, solar and biomass are clearly attractive options and should all be pursued as part of a wider plan to decentralise the energy system, create more (and more efficient) CHP networks and make Leeds self-sufficient in renewable low carbon energy. I cannot rank them without knowing more specific detail on the amount of energy we can produce from each source, what sites are suitable and what the environmental and socio-economic impacts will be of favouring a particular technology. I strongly support the provision of new renewable energy infrastructure. • Issue 23 - Option 3 seems preferable. A spatial approach must identify all sites or recognise that some new viable sites will emerge in the future and that the DPD should allow for suitable sites missed out of the original (spatial) mapping exercise to be utilised for RE development. Criteria based policies should not only allow suitable sites to be developed for RE (including those not identified in spatial guidance) but should also oblige developers to utilise RE wherever possible. Just because a site is not identified as suitable in the spatial guidance does not mean it is not suitable for RE development (due to error, uncertainty, technology change, changes in neighbouring land use. etc). Criteria will help ensure suitable sites not identified in the spatial guidance can be developed for

	<p>RE.</p> <ul style="list-style-type: none"> • Issue 24 - Option 1. Every development MUST make the most of its renewable energy generating capacity. All new development should utilise renewable energy. Energy efficiency and minimising unnecessary demand and waste is key to protecting our energy resources. Excellent energy efficiency standards should be met on all new developments. • Issue 25 - Leeds is able to produce significant levels of energy within the Authority Area. REWORD QUESTION: In the event that Leeds FAILS to produce.... Also define significant in terms of X% of total energy demand of the city. I see no harm in pursuing RE technology opportunities for Leeds if the infrastructure may be based outside Leeds. Leeds should utilise renewable energy opportunities wherever they present themselves and should partner with other agencies and authorities if conducive to securing more renewable energy. • Issue 26 - Unless I misunderstand- the two are not mutually exclusive. The NRWDPD should require new developments to incorporate microgeneration and other DPDs should also require new developments to incorporate microgeneration. If different technologies are more appropriate to different types of development this can be highlighted in the DPDs. • Issue 27 - No suggestions for other micro renewable technologies that could be used in Leeds. I would support any sustainable renewable technologies but I am not aware of any others. • Issue 29 - Option 2 and 3 should be considered. I do not know how many GWH/ MWH of electric we would get from developing sustainable micro hydro power but I think it needs to be explored. There must be scope for fitting micro hydro power to existing weirs, locks and dams and these should be combined with a fish pass to allow salmon and other fish to migrate and move along the aquatic habitats of Leeds. Biodiversity and fish are important natural resources. • Issue 30 - Yes. We must use resources efficiently. I strongly support this proposal. CHP is one way this will work. Waste management also has the potential for increased efficiency by adjacent developments working together and also separate developments that share a common waste resource (e.g. Company X produces waste cardboard, company Y can take that waste cardboard by canal to company Z who recycles it and recovers value).
<p>Stakeholder I: Friends of the Earth</p>	<ul style="list-style-type: none"> • Issue 20 - Prefer options 1 and 2. Climate change is the greatest environmental threat facing the planet. There are opportunities to tackle climate change through a mixture of energy efficiency and deployment of renewable energy. The Stern Report highlighted the fact that failing to act on climate change would be far more economically damaging than taking action. We need to act to vastly increase our proportion of energy generated from renewable sources and Leeds must play its part in doing this. • Issue 21 - Gas for energy use needs to be reduced and be replaced by renewable sources of heating and energy. This will help to combat the twin issues of climate change and energy security (as most gas is imported). Policy for the storage of gas for carbon storage should be reviewed regularly as best practice and available technology is rapidly developing. • Issue 22 - Energy from waste incineration should not be classified as a renewable energy as it requires the input of waste which could otherwise be recycled saving large quantities of energy. It should not be counted as an option towards the energy mix for Leeds. The problem of climate change is so acute that we need to embrace the sources of renewable energy that have a proven track record of delivering energy and that are most suitable for the area. Wind energy can be utilised with great effect in some areas of Leeds. Solar power (both water heating and photovoltaic energy) should be deployed more widely particularly on larger developments. Hydropower can be deployed on the area's rivers e.g. Wharfe and Aire valleys to provide small scale community schemes. • Issue 23 - Option 3 – The NRWDPD should contain a mixture of spatial guidance and criteria based policies? Where a developer has expressed an interest in a particular site and that site has been shown to offer the

	<p>environmental benefits, then that area should be safeguarded. However, to facilitate further uptake of renewable energy, other sites which have shown to offer opportunities should also be safeguarded in order to maximise our renewable energy availability. Reference should be made to the sub-regional targets included in RSS for renewable energy generation to ensure that sufficient land is safeguarded to achieve these targets.</p> <ul style="list-style-type: none"> • Issue 24 - Option 3 – A higher threshold (please specify in comments box below)? Leeds should conduct research into the best achievable threshold that can be applied in the area which balances the environmental gains with the economic practicalities of achieving this. This research evidence should be the basis for setting the threshold. • Issue 26 - Furthermore, microgeneration should be required for developments above a certain size. This should apply across all types of development and inclusion in the NRWDPD will ensure an integrated approach to this aim. • Issue 27 - The list in Issue 26 seems to be wide ranging. Leeds City Council should deploy resources to keep abreast of developments in technology and to ensure that these developments are incorporated into policy delivery. • Issue 29 - Option 2, the river valleys around Leeds are prime sites for the development of small scale hydro-power and the DPD should ensure that these opportunities are capitalized upon.
Stakeholder B: South Headingley Community Association	<ul style="list-style-type: none"> • Techniques and technology will change rapidly. Leeds needs to be able to adapt to these. Including what can be done by individual households and buildings, exploring the possibilities of grants to promote these. No to heat from waste by incineration
Stakeholder F: CoalPro	<ul style="list-style-type: none"> • Issue 20 - the only feasible option is Option 5, a combination of the others. There are reasonable possibilities for increasing the proportion of the city's energy being provided by renewables, CHP and indeed other sources. There is no reasonable possibility for the foreseeable future of avoiding some continued reliance on fossil fuels as is explicitly recognised by Government policy.

Table B.12 External Stakeholder Responses: Energy and Climate Change

Internal Stakeholders

Table B.13 presents a summary of Energy and Climate Change responses from Internal Stakeholders, received in letter or email format.

Energy and Climate Change	
Stakeholder L: Leeds City Council	<ul style="list-style-type: none"> • "Policies should support renewable and low carbon energy, identify potential for renewable energy in the Leeds area and allocate and safeguard potential sites" - for renewable energy.

Table B.13 Internal Stakeholder Responses: Energy and Climate Change

General Public

Table B.14 presents a summary of Energy and Climate Change responses from members of the public, received in letter or email format.

Energy and Climate Change	
General Public A: Headingley Resident	<ul style="list-style-type: none"> • Techniques and technology will change rapidly. Leeds needs to be able to adapt to these. Including what can be done by individual households and buildings, exploring the possibilities of grants to promote these. No to heat from waste by incineration

Table B.14 General Public Responses: Energy and Climate Change

Water Resources

External Stakeholders

Table B.15 presents a summary of Water Resource responses from External Stakeholders, received in letter or email format.

Water Resources	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> • Issue 32 - Would it be appropriate for the DPD policy to: Option 1 – Define sensitive receptors where adjacent development will not be allowed, and identify the distance of an appropriate buffer zone, or Option 2 – Use a criteria based policy approach against which it must be demonstrated that a development will at minimum have no impact on water quality with mitigation measures, or... Or what? Or else! Option 3: define sensitive receptors where development is not allowed (within appropriate buffer zone) because it is not possible to mitigate against damaging water quality. For areas where mitigation may protect water quality then criteria must be met for that development to take place. My personal view is that all waterside development (except infrastructure that NEEDS to be directly adjacent to a waterway e.g. boating infrastructure, canal freight infrastructure) should include a buffer zone because the waterways should provide green infrastructure in the form of wildlife corridors and linear parks with walking and cycling infrastructure, native and edible plants and good biodiversity. The Aire & Calder Navigation can take large barges capable of carrying 600 metric tonnes, so the economics are much better than our smaller canals. What is required in infrastructure is a suitable wharf in Leeds and suitable end points for materials to be transported to. • Reduction in water demand (lots of rainwater capture) • Issue 33 - Option 1. Yes. People need to be prevented from paving their gardens- its bad for floods and urban heat island effect. It is disastrous for urban wildlife. Porous paving is better than impermeable paving but it is still bad. Have a policy to encourage the retention of existing soil and biodiversity resources by heavily restricting new paving. Answer: Rainwater collection and storage (and utilisation). SUDS (linked to wildlife habitat, rainwater harvesting etc). Functional floodplains (not necessarily have to be linked to rivers). Greener infrastructure. More vegetation (esp. native species). Remove (as well as prevent new) impermeable surfaces. Green roofs. Increase the amount of organic matter in the soil. • Issue 34 - Option 1. YES. Answer: Reduce demand for water. 'Hippos' in toilets. Water-air mixers in taps.
Stakeholder I: Friends of the Earth	<ul style="list-style-type: none"> • Issue 33 - Option 1 – inadequacies in the drainage system in any area affects the flooding in specific parts of the city. Therefore, a blanket approach must be taken to prevent these impacts affecting vulnerable communities. • Issue 34 - Option 1 – the extraction, cleansing and distribution of water consumes energy and, therefore, produces emissions. In a robust climate policy, we need to minimize waste of energy wherever possible and this includes waste from inefficient use of water. This policy should include the requirement, where practical, of rainwater collection and grey-water systems. • Issue 35 - Option 1 – whereas it is clear that major gains can be made from applying this policy to major developments, to maximize the benefit it would need to be applied to all developments.
Stakeholder B: South Headingley Community Association	<ul style="list-style-type: none"> • Need full protection from pollution. Including rivers etc and all sources of drinking water. Technology will probably change rapidly; moves towards personal self sufficiency should be encouraged and promoted as technology allows this.
Stakeholder N: British Waterways	<ul style="list-style-type: none"> • British Waterways comments that Government is actively encouraging greater use of inland waterways for the movement of aggregates where it is practical, economical and environmentally desirable to do so, as stated in "Waterways for Tomorrow" (DETR, 2000). Policy T4 of the Yorkshire and Humberside Plan sets out an appropriate policy position and one which should inform the Joint Minerals Development Plan Document. The

	<p>requirement in Policy T4 is to 'identify and protect appropriate facilities for the loading and unloading of water-borne freight, having regard to issues such as landside transport links and potential conflicts of use and disturbance.' British Waterways supports the approach within the Yorkshire and Humber Plan and any policy within the DPD should be consistent with this. Again we would like to stress the multi-functional role of the waterway and stress the importance that sites are suitable and appropriate for freight usage.</p> <ul style="list-style-type: none"> • Issue 28 - New development alongside the waterway should consider using the water for cooling of building and heating systems. British Waterways can advise on these schemes. Use of small hydro schemes on weirs and locks. Again, consult British Waterways.
Stakeholder J: Lafarge Aggregates Ltd	<ul style="list-style-type: none"> • Issue 33 - Neither option 1 or 2 are acceptable. Drainage capacity across the region can be improved by upgrading and maintenance of existing facilities. However, it should be recognised that certain types of development (e.g. minerals extraction) can provide flood attenuation benefits which will also help in managing the effects of climate change and significant rainfall events.

Table B.15 External Stakeholder Responses: Water Resources

Internal Stakeholders

Table B.16 presents a summary of Water Resource responses from Internal Stakeholders, received in letter or email format.

Water Resources	
Stakeholder L: Leeds City Council	<ul style="list-style-type: none"> • Policies should encourage water efficient development, sustainable urban drainage systems, grey water recycling, rainwater schemes and attenuation of surface water drainage. Policies should ensure development does not affect the quality of rivers and catchment areas. Policies should properly screen for pollution and adverse water quality implications in potential development areas.
Stakeholder H: Leeds City Council	<ul style="list-style-type: none"> • His immediate concern is in relation to the way in which the Council is about to deal with the sale of a piece of its land – St. Ann's Mill, Kirkstall. This land is adjacent to the River Ayre, and he thinks is either in the functional floodplain or high risk zone. The Council wants to sell it for a capital receipt, but his local community want to ensure that it, and other land by the river is safeguarded for community parkland and water based recreation. Mentioned specifically a canoe scheme currently being discussed with the British Canoe Union - it seems that our DPD misses out on opportunities such as these (and water sports aren't even mentioned in the PPG17 plans). • He was asking detailed questions about whether the SRFA has been updated at all since it was prepared last October, and specifically in relation to a piece of land south west of the site. I tried directing him to the Core Strategy team but he feels there is a conflict of interest in that the Council planning dept is involved in the sale of this site. He is aware that Jacobs did the SRFA for LCC, and would like to speak to someone from the team who can perhaps advise him on the methodology and the results for this particular site.
Stakeholder O: Leeds City Council	<ul style="list-style-type: none"> • FYI I am in effect the programme manager in effect for the Council's flood risk management improvement programme which has been underway for some 4 years now. We have an internal working group which acts as a board for monitoring progress on a long-established action plan which has evolved in line with knowledge, resources and events. I noted with interest a reference on p.2 of the consultation document to the creation of a possible policy document on FRM: we actually have one of these already (although it goes by a different name) and was approved several years ago. I attach this for info (saved in 'Internal Responses' folder). • The section on energy and climate change alluded to increased flooding risks and the role of SUDS and the attenuation of surface water drainage. I am attaching our annual report on FRM which highlights some of the

	work being done in this area (saved in 'Internal Responses' folder). It might also be worthwhile you speaking to the Principal Land Drainage Engineer, Dave Sellers, to establish more detail on how this is approached.
Stakeholder P: Leeds City Council	<ul style="list-style-type: none"> To complicate the matter further, in addition to the document that Richard sent on 'Policy on Maintaining Water Resources and Responding to Flood Incidents', the Council also has a formal 'Policy Statement on Flood Defence' - as required by MAFF/DEFRA under the Government's 'High Level Targets for floods and coastal defence'. This completed in accordance with the template required by the Environment Agency and was approved by the Council in 2001. It is the responsibility of the Land Drainage Section, as flood defence operating authority, to draft this policy. I attach a copy for information (saved in 'Internal Responses' folder). This is a public document - approved by DEFRA and the Environment Agency. It is recognised that this now requires substantial updating in light of the Council's recently implemented Flood Action Plan (and the outcome of the Pitt Review). This we intend to do, but we have been advised by the Environment Agency to 'hold off' pending the issue of a new template that takes account of national changes.

Table B.16 Internal Stakeholder Responses: Water Resources

General Public

Table B.17 presents a summary of Water Resource responses from members of the public, received in letter or email format.

Water Resources	
General Public A: Headingley Resident	<ul style="list-style-type: none"> Must be protected from pollution. Including rivers etc and all sources of drinking water. Technology here will probably change rapidly, there may be a move towards personal self sufficiency as technology allows this.

Table B.17 General Public Responses: Water Resources

Air Quality

External Stakeholders

Table B.18 presents a summary of Air Quality responses from External Stakeholders, received in letter or email format.

Air Quality	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> Issue 36 - New option: The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed within the DPDs on transport, housing, employment and retail and any other relevant DPDs and AAPs. Issue 37 - Option 1 would be nice as it will protect air quality from new sources of pollution but I see that a combination of Option 2 and 3 would allow retrofitting and could therefore achieve a better overall improvement in air quality. Issue 38 - Option 3: Agree. AQMAs will be the priority areas but we should improve air quality throughout Leeds.
Stakeholder I: Friends of the Earth	<ul style="list-style-type: none"> Issue 36 - Transport does comprise the majority of air quality problems and this is particularly the case in significant arterial routes around the city, such as in AQMAs. However, since it is not the only cause of air quality problems the NRWDPD should contain a policy on improving air quality. Hence, Option 1 should apply. Issue 37 - Option 1 – there should be a presumption against polluting development, and Option 3 – retrofitting of technology should be required Issue 38 - Option 3 – there is a cumulative effect of air pollution on health which means that any gain on improving air quality has a beneficial

	<p>impact. Focus should be placed on AQMAs but mitigation measures should be applied to all developments, where practical.</p>
<p>Stakeholder B: South Headingley Community Association</p>	<ul style="list-style-type: none"> • Must protect from pollution. Protections must include all locations in Leeds where people live and work. Incinerators, which degrade air quality so markedly, must not be allowed. • Pollution from transport should be reduced as much as possible, both directly by discouraging use of pollution emitting vehicles, and directly by promoting local centres to reduce travelling and promoting environmentally friendly transport including walking and cycling. Very much more use of public transport should be facilitated and promoted for when walking and cycling are impractical; public transport needs to be good and cheap. Trolley buses might achieve this, especially if given priority over cars. People would soon see that they could proceed rapidly by trolley bus but not by car.
<p>Stakeholder E: Highways Agency</p>	<ul style="list-style-type: none"> • Issue 38 - AQMAs close to the Strategic Road Network (Dewsbury Road AQMA close to M621) are a matter of concern for the Highways Agency. The Agency considers it appropriate to have a policy that requires development to address and mitigate against air quality impacts in the identified AQMAs.

Table B.18 External Stakeholder Responses: Air Quality

Internal Stakeholders

Table B.19 presents a summary of Air Quality responses from Internal Stakeholders, received in letter or email format.

Air Quality	
<p>Stakeholder L: Leeds City Council</p>	<ul style="list-style-type: none"> • The definition of Air quality seems limited - are there no other ways to improve air quality, be that reducing removing contaminants and particles, or be that addressing odour or noise. • Policies should promote the potential for new fuel technology and associated refuelling infrastructure. • "Policies should ensure that potentially polluting development be situated in appropriate locations" - which are?? • Policies should aim to minimise carbon emissions through locational transport infrastructure policies, the facilitation of rail and waterways for transportation and encouraging alternative to cars and lorries.

Table B.19 Internal Stakeholder Responses: Air Quality

General Public

Table B.20 presents a summary of Air Quality responses from members of the public, received in letter or email format.

Air Quality	
<p>General Public A: Headingley Resident</p>	<ul style="list-style-type: none"> • Must be protected from pollution. For all people in Leeds, at home and in the work place etc. Incinerators, which degrade air quality so markedly, must not be allowed. Pollution from transport should be reduced as much as possible, both directly by discouraging use of pollution emitting vehicles, and directly by promoting local centres to reduce travelling and promoting environmentally friendly transport including walking and cycling plus promoting very much more use of public transport when walking and cycling are impractical (the public transport needs to be good and cheap).

Table B.20 General Public Responses: Air Quality

Sustainability and Integration

External Stakeholders

Table B.21 presents a summary of Sustainability and Integration responses from External Stakeholders, received in letter or email format.

Sustainability and Integration	
Stakeholder A: Leeds Voice Environmental Forum	<ul style="list-style-type: none"> Issue 39 - Option 2. Agree. The waterways can be a low carbon, low pollution way of moving freight including waste and minerals. (need to ensure the wildlife and recreational value of the waterways is not too adversely affected)
Stakeholder I: Friends of the Earth	<ul style="list-style-type: none"> Issue 39 - Option 2 – modal shift away from road transport is highly desirable for freight due to greater potential economies of scale leading to lower emissions. Friends of the Earth recognizes that there will still be a need for some road-based transport but would want to see policies which maximized the use of other forms of transport. With regard to the use of alternative fuels for lorry transportation, there should be a wider understanding of the environmental impact of these fuels. The use of biodiesel, for instance, should only be encouraged once firm sustainability criteria have been introduced at a national and European level. Issue 40 - Development should be sited in locations which offer both environmental protection and safeguarding of biodiversity with the maximum reduction in greenhouse gas emissions. Where these objectives appear to conflict, wider consultation should be made with key stakeholders, including local residents, to ensure that the best overall result.
Stakeholder B: South Headingley Community Association	<ul style="list-style-type: none"> This needs to make quality of life for ALL the people of Leeds the overriding consideration, bearing in mind environmental needs. All communities are equally important – there is a tendency in Leeds for discrimination against some areas in both the provision, and in the siting of undesirable projects. A tendency for leafy suburbs to benefit at the expense of inner city or less advantaged areas which needs to be strongly resisted.
Stakeholder C: The Coal Authority	<ul style="list-style-type: none"> Issue 39 - The Coal Authority would support Options 1 and 2. However, site accessibility should be assessed on a site by site basis with reference to a criteria based approach. Whilst it is desirable that sites are located where alternative transportation methods exist it is important that flexibility is retained as certainly for minerals, they can only be mined where they are found which may not be accessible modes of transport other than roads. The Coal Authority does feel strongly that the broad locations for future rail depots/wharfs should be safeguarded. Although it is important that these broad locations do have a degree of reasonable certainty of coming forward.
Stakeholder E: The Highways Agency	<ul style="list-style-type: none"> Issue 39 - Option 1- No. Given that Leeds has access to alternative modes of freight transport such as rail and water, road transport should not be relied on as the main mode of minerals and waste transfer. Most parts of the Leeds Strategic Road Network are already operating at or over capacity. Additional freight traffic on the same will deteriorate the operating conditions on the SRN and lead to more air pollution. Option 2- Yes. Leeds is fast growing as a regional capital and so is the need for transportation of goods. The strategic road network is already operating very close to capacity and sometimes even over it. In such circumstances, more alternative options for transportation are required in order to reduce the need for road transport.

Table B.21 External Stakeholder Responses: Sustainability and Integration

Internal Stakeholders and General Public

There were no comments relating to Sustainability and Integration from Internal Stakeholders or from the general public.

Appendix C - Supermarket Exhibition Comments

General Responses

The following **general (non-thematic) responses** were received from members of the public at Supermarket Exhibitions:

- Stakeholder was very disheartened with the Council and their approach to consultation; he refused to take a questionnaire as he felt his comments wouldn't make a difference... "they don't listen to our views; they do what they want or what is cheapest anyway".
- Street Scene Services stakeholder was also critical of the Council's approach to brown bins (for garden waste)... "the trial took place in 'rough' areas where they expected the bins to fail, *but* they were successful, people wanted to recycle garden waste but the Council ignored the results".
- "Why does it take 3 years to do this [the NRWDPD]. Do tax payers have the opportunity to say the last plan was alright?"
- Complaint about Leeds City Council's information to small/medium sized companies (especially small restaurants). "There is no clear path re information on how to recycle, how to become greener".
- "Why should I fill in a questionnaire when I can't even get a black wheelie bin never mind a recycling bin? I've rang the Council 7 times".
- "My view is not important and I know what the Council are like".
- One stakeholder was given a mid-technical questionnaire to fill out and felt it required too much technical knowledge. She was unable to put her points across the way she wanted to; an intelligent and articulate member of the public was put off by the questionnaire. A member of staff spent time going through the public questionnaire with her, however she proved the point about jargon and 'customer' approach to consultation. "You need to think about the audience not the technical subject".
- "The first thing that needs to be done is to get rid of all the councillors who are in the pockets of the business sector, otherwise nothing will change. We're burning too much gas and not using it elsewhere, e.g. to power neighbouring users".
- "I would like the WI to be consulted, and also Leeds Women's Guild and Countryside Women's Guild consulted".

Waste

The following responses regarding **Waste** were received from members of the public at Supermarket Exhibitions:

- "Does material put in recycling bins actually get recycled? If it goes to landfill why should I bother?"
- "Litter problems in Hyde Park in summer time highlight the need for recycling facilities there".
- "There should be more recycling facilities"; asked about compost bins.
- "There are too many collecting bins; why not collect the rubbish and then sort and recycle or incinerate?"
- "I work for the Council in Street Scene Services, and we've been told in the past, when recycling centres are closed or out of action, to collect all bins (including recycling) and take all to landfill".

- “Recycling collections are not frequent enough. The normal rubbish in black bins can go up to 3 or 4 weeks but other bins should be collected more often as these fill up fastest. I’ve got a small kitchen and it’s always full of recycling waiting to be taken outside; I’ve not got enough space”.
- General complaint about the Council collecting recycling and normal rubbish; “why should I bother to sort it out if it all gets put in one hole!”
- “The Council should not just put an emphasis on increasing recycling but look toward helping people reduce the amount of waste that goes to landfill”.
- “Leeds sends all our rubbish to China. They wouldn’t give me a wheelie bin because they say I’m too old; I have to have black bags. Leeds City Council – what do they do? I don’t want anything to do with them”.
- “Waste is the most important issue for us. People need educating about reducing waste that cannot be recycled”.
- “The recycling route is up and down the Kirkstall road but the van won’t stop on urban roads to pick up green bins. It’s not satisfactory what Leeds City Council will and won’t recycle”.
- “When I’m recycling I’m not sure whether I’m putting in the correct type of materials, or too many that can’t be used. No guidance received from the Council”.
- “All recyclable products should have an easier to understand symbol system for recycling”. The stakeholder did acknowledge that this would require national agreement and isn’t an issue to be solved only within Leeds.
- “A lot of land is being sold off. Many residents have complained about chest problems since the landfill – why is it always Garforth?”
- One stakeholder showed concern over an application for an incinerator in the Leeds area and what the implications are.
- “Why can’t vegetable waste go into the new green wheelie bins? Grass and cuttings go in so why shouldn’t vegetable cuttings?”
- “Why do we separate green, clear and brown glass and then it all goes into one vehicle?”

Minerals and Aggregates

There were no responses regarding **Minerals and Aggregates** from members of the public at Supermarket Exhibitions.

Land Use

The following responses regarding **Land Use** were received from members of the public at Supermarket Exhibitions:

- “My street has been filled up with students and new housing is being crammed into green space; this makes me annoyed” (Anonymous comment).
- One stakeholder voiced concerns about loss of SSSI sites; “the Arla Foods factory is an example of a local development built on a SSSI site” (Anonymous comment).

Energy and Climate Change

The following responses regarding **Energy and Climate Change** were received from members of the public at Supermarket Exhibitions:

- “Why is Leeds City Council putting up brand new street lights when the existing ones are ok? It’s a waste of money”.

Water Resources

The following responses regarding **Water Resources** were received from members of the public at Supermarket Exhibitions:

- One stakeholder specifically referred to the problem of people paving over gardens and creating surface water run-off flooding problems.

Air Quality

The following responses regarding **Air Quality** were received from members of the public at Supermarket Exhibitions:

- Concern that Street Lane in Moortown is being used as a rat run to avoid traffic lights; “it brings more polluting cars at high speeds into residential areas”.

Sustainability and Integration

The following responses regarding **Sustainability and Integration** were received from members of the public at Supermarket Exhibitions:

- “Why do supermarkets still give out plastic bags? They should not provide bags at all and that customers should have their own across the board; this should be government policy”.

Appendix D - Stakeholder Workshop Question & Answer Session

General Responses

Table D.1 presents a summary of **general responses** from the Question and Answer Session at stakeholder workshops. The topics addressed include consultation methodology, LDF context and the monitoring of the DPD.

Question / comment by stakeholder	Response from Jacobs or Leeds City Council
<p>Consultation - engagement with education establishments: Primary schools would be a good way to reach and influence parents and FE establishments should be engaged. There is a need to consult lower down; schools are aware of what is best for Leeds.</p>	<p>Teachers have attended exhibitions and taken materials for use in their classes. Schools have great potential to teach children about recycling and behaviour change within the home however often the schools themselves don't recycle. We've received low responses from educational establishments (although University of Leeds attended workshop). Time is an issue with engaging schools; by visiting the supermarkets we've discussed issues (and not just recycling) with a wide range of people.</p>
<p>Consultation: How wide is the public consultation? I wasn't aware of anything happening in my ward? How much difference will this consultation make?</p>	<p>Its best practice to include as many opinions as possible, and also a mandatory requirement to draw information from the public; we will spend the time and effort to do so. It's also down to you to tell your electorate to pay attention and be involved. Leeds is a big area and there's lots of consultation taking place on many other issues. Postal questionnaires aren't very successful and we wanted to take the message out simply (i.e. the 'Polly' board). We've used several different methods to inform the public and tried to make it as easy as possible for them to be involved. Members of staff have been present at the supermarkets to allow people to vent their issues and once people get over 'the bins issue' we've had some good discussions and comments. We've gone Countywide as much as possible; not just Leeds City Centre but a range of surrounding wards. We have also worked with Community Groups (including Leeds Initiative and Leeds Voice) and plan to engage other hard to reach groups – people are responding well to us going out to engage with them rather than expecting them to come to us. It would have been impossible to visit every single supermarket in every ward. We tried to pick shopping areas where people congregate.</p>
<p>Consultation: Supermarkets are good for reaching people but they are very close to the waste and packaging dilemma – what have they said? I agree supermarkets are a good place to consult, but I suspect people in supermarkets might not comment on water resources...</p>	<p>There couldn't really be a better place to put the message across; right at the heart of consumerism. Many shop managers at the St John's Centre were delighted we were approaching them, and it was clear that the individual ability to make changes is limited. There is a bigger national job to put pressure on manufacturers and retailers; getting policies to fit the wider national picture was something discussed at the Leeds Voice Forum (Nicky Leggatt). Two of the most major issues in Leeds are food waste and amount of money spent on food purchased; it's interesting to see how supermarkets are reacting to the DPD. The public may not understand the technical issues but they can apply them to their lives. They may not talk in terms of water policies but they understand flooding as it happens to them. Community engagement is key.</p>

<p>Local Development Framework context: How can the Regional Spatial Strategy (RSS) be sustainable if we're basing it on non-sustainable policies?</p>	<p>This DPD is an opportunity to really progress the Sustainability Appraisal (SA); we're taking a more detailed approach by using the Natural Resource Flow Analysis (NRFA) and Ecological Footprint (EF). We will continue to make representations on the RSS, however we have to work with what we've got, e.g. renewables targets are back in at 10%, but the NRWDPD will allow us to build on this baseline if we decide to do so. Developing a sustainability plan is not the end point; sustainability is a process.</p>
<p>Local Development Framework context: How powerful as a tool will the DPD be in the planning process?</p> <p>You mentioned links between the other DPDs... are you involved in the others e.g. the Housing DPD, and can I be consulted and involved in that one too?</p>	<p>This DPD is just one part of the planning jigsaw; there are other DPDs (e.g. Housing, Environment, and Transport) It is such a rigorous process to approve and adopt a DPD that any planning decisions in the future will be strongly assessed against the DPD, and it will provide a very sound basis to refuse planning applications. Considerable weight will be attached to the DPD. We're aiming to start production of the Housing DPD in 2010, and currently information is being gathered for this. It will be managed and produced in-house (Leeds City Council) but we will use the evidence base built up in the production of this DPD.</p>
<p>Local Development Framework context: How does the DPD planning timescale fit in with the Core Strategy (CS)?</p>	<p>The new planning system requires a number of plans to be prepared in parallel. The CS timetable is slightly ahead of the NRWDPD so it's just in the lead. The challenge with the CS was the slipping schedule for the Regional Spatial Strategy (RSS); we didn't want the CS to overtake this. We made sure the CS cross-references the NRWDPD.</p>
<p>Monitoring: How will the DPD be monitored? Will local indicators or national measurements be used?</p>	<p>Needs to be monitored using indicators appropriate for Leeds and for example the NRFA and EF are specific to Leeds. They should be consistent to allow comparison across local authorities.</p>

Table D.1 Stakeholder Workshops, Questions and Answer Session: General Responses

Waste

Table D.2 presents a summary of responses from the Question and Answer Session at stakeholder workshops on the topic of **Waste**.

Question / comment by stakeholder	Response from Jacobs or Leeds City Council
<p>Natural Resource Flow Analysis: There is a problem about the word 'waste'. Waste is a natural resource in the wrong place. We need to make waste flows more explicit in the document; and also how to find the space in Leeds should be made clear. The NRFA 'black box' diagram should draw out issues more explicitly by theme; the things going on inside the 'reuse-reuse-reclaim' box is more important than what's going in and out. Climate Change should feature as the overarching theme across the 3 main 'cycles' (Water cycle/natural environment, Energy cycle, Raw materials and waste cycles). Its there but the emphasis needs shifting; 'that box' is what this DPD is all about.</p>	<div data-bbox="828 1402 1393 1732" data-label="Diagram"> </div> <p>The translation from technical documents to policy document summaries means emphasis and focus can be lost in the translation. Interpretation is an important factor here as the summary has to communicate the information to a wide range of people without losing the focus of the content.</p>

<p>Regional integration: It's admirable what you're trying to achieve, but what can the City do on its own? We need to be linked nationally and the DPD should be produced in conjunction at least with our closest neighbours.</p> <p>Leeds should be resource mapping at a wider scale, not just planning for its own waste. But, this is a national problem, not just Leeds being too small scale in approach.</p> <p>Sub-regional, cross boundary thinking when deciding on site locations will take advantage of the transport network.</p>	<p>Wakefield, Harrogate and other neighbouring authorities are all consultees but there is no agreement for joint plans. The RSS covers regional concerns and these have been taken into account so far in this DPD. Leeds is the authority for the Leeds Metropolitan area so have to take into account regional policies for the Yorkshire and Humber area. Proximity is a key factor however stakeholders should be involved when determining the factors influencing location of waste sites sub-regionally.</p>
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Table D.2 Stakeholder Workshops, Questions and Answer Session: Waste

Minerals and Aggregates

There were no responses from the Question and Answer Session at stakeholder workshops on the topic of **Minerals and Aggregates**.

Land Use

There were no responses from the Question and Answer Session at stakeholder workshops on the topic of **Land Use**.

Energy and Climate Change

Table D.3 presents a summary of responses from the Question and Answer Session at stakeholder workshops on the topic of **Energy and Climate Change**.

Question / comment by stakeholder	Response from Jacobs or Leeds City Council
<p>Evidence base: Will the Ecological Footprint (EF) be submitted to the inspector like the NRFA?</p>	<p>The SA and Sustainability Report are statutory submissions. The EF is part of the NRFA; it's a summary conclusion in a public friendly format.</p>
<p>Ecological Footprint: What inputs went into calculating the Ecological Footprint? What makes London different from Leeds? Is there a steer from Government on target footprint size?</p> <p>Cities can't be self sufficient but they can be sustainable due to efficiencies of high population densities and economies of scale. Why can't we be aspirational with our targets? We need to exceed the 26% reduction targets; low aspirations will mean humanity is doomed! Careful attention to procedure might create an outcome of not much use.</p>	<p>The EF considered the same issues as the NRFA; inputs included energy types, minerals, and resource uptake and land usage. The EF for cities (compared to more rural regions) will always be large even if they're resource efficient; however we're trying to be more efficient with resource consumption to bring our footprint down. City footprints are higher simply because of the high population density. A number of elements account for the difference between the Leeds and London footprints – for example London uses more food per person but less water per person than Leeds.</p>

Table D.3 Stakeholder Workshops, Questions and Answer Session: Energy and Climate Change

Water Resources

There were no responses from the Question and Answer Session at stakeholder workshops on the topic of **Water Resources**.

Air Quality

There were no responses from the Question and Answer Session at stakeholder workshops on the topic of **Air Quality**.

Sustainability and Integration

Table D.4 presents a summary of responses from the Question and Answer Session on the topic of Sustainability and Integration.

Question / comment by stakeholder	Response from Jacobs or Leeds City Council
<p>Evidence base: The Ecological Footprint includes Energy and Climate Change elements; however Climate Change should be central. Will this come through as a strong enough element if it's lost within the NRFA?</p>	<p>This is exactly the kind of comment we want to take forward. The extensive technical research that been done (in the form of the SA, NRFA, EF) all form the evidence base required for the DPD, but public consultation responses are also a big contribution to this evidence base.</p>
<p>Integration with existing plans: We are currently writing Kippax Housing Plan and the Village Design Statement was produced last year. How does the DPD support smaller plans?</p>	<p>The current planning context makes it difficult to produce lots of plans in parallel, and Government guidance is changing all the time making it hard to keep up with new requirements. Also, LCC are planning for the whole Leeds region so there is a need for the DPD to cater for general city wide interests meaning we might not get down to smaller area level. We're not approaching this DPD from a policy vacuum. Most issues will already be represented; it's just a case of integrating them. We will be taking all existing plans and policies into account; the next stage of consultation will allow more comments to be picked up.</p>
<p>Economic benefits: Job creation and economic development is important; what economic benefits will this DPD bring?</p>	<p>The Sustainability Appraisal (SA) <i>has</i> to consider economic benefits as well as social and environmental elements. The policies do tend to score high in the economy section as they'll help us operate more efficiently, reduce fuel poverty etc. The cumulative effect will be positive if not immediately beneficial in the short term. Also scope for new job creation e.g. in green energy production.</p>

Table D.4 Stakeholder Workshops, Questions and Answer Session: Sustainability and Integration

Appendix E - Stakeholder Workshop Post-it note Comments

Waste

Table E.1 presents a summary of post-it note responses on the topic of **Waste**.

Post-it note comment		About Right	Passive	Not At All
Waste				
A	Should Leeds just plan for its own waste or also consider cross boundary waste issues given its role in the wider Leeds City Region?	11	1	1
		<ul style="list-style-type: none"> • Yes. Sufficient waste in Leeds to justify its own infrastructure and going much beyond this will result in unacceptable environmental impacts of transportation. However, should not be an absolute requirement. This would be unworkable as waste doesn't respect LA boundaries and might not be the most sustainable option depending on location of facilities within City area. • Given the spiralling landfill costs, can Leeds afford to risk massive delays that might result from trying to establish formal partnerships with their LA's? • Yes we should. Leeds must have ownership for its own waste management but there is no need to dependent on others • We need to do both i.e. plan for managing Leeds own waste but we have to broaden and widen thinking beyond local application. • This is a City Region problem and should have a City Region solution. • This is a double question. On the face of it Leeds should plan its own waste strategy but should consider a holistic City Region approach to see if there are better options. There are also currently crazy cross border issues near district boundaries where people cannot go to their nearest facilities. • Questions 1 and 2 are closely linked. Leeds needs to do both, identifying sites at boundaries. Strategic sub-regional site for commercial and industrial waste (Aire Valley/North Wakefield) • Consideration should be given to the best way to increase reuse and recycling rates. If this is not achieved, through cross-boundary planning then so be it. • Co-location of sites at sub-regional level. Cross-border waste movements – evidence of this. Create a Waste forum made up of local authority representatives from W & S Yorkshire (Leeds City Region?) • Own waste but recognise more 'local' cross-boundary issues. • Yes to both • The idea (of a cross-boundary approach) seems good but considering cross-boundary issues will mean more need for transportation which is bad both for the environment and the strategic road network. (More HGVs will cause congestion) 		
B	Should waste facilities be located together and concentrated on a limited number of larger sites?	4	6	0
		<ul style="list-style-type: none"> • Yes, in order not to disrupt the quality of life in residential areas • Certain locations in Leeds have a concentration of waste producing/processing facilities/waste resource users – it would make sense to centralise in these circumstances. 		

		<ul style="list-style-type: none"> • Yes – together but need a number of small sites (recycling sites). • Depends on the type of waste e.g. composting would/is much better as a resource for local residents if located centrally. • Depends on the type of waste and type of waste facility and where the final processing destination is. Also, what is the final destination after that? Appropriateness is the key. • No necessarily – it depends on land availability. Also there is little point locating all waste facilities together as this will increase transportation (air quality and emission problems etc.) from collection point end to markets. Need to consider start and end point in location decision. • The question was seen as closely linked to the issue of cross boundary working and the concept of strategically located and shared sites (above) • Facilities need to be located so that transport emissions are reduced as much as possible. This should be reflected/investigated in the analysis of potential locations. • Try locating waste facilities depending on the type of waste that is primarily generated from an area. Over concentration might lead to more need for transportation and thus congestion. • (We need) plenty of smaller ones. • Must consult with other areas and indeed across the nation. 			
C	<p>Are certain parts of the City more suitable and therefore represent the most appropriate location for waste uses?</p>	<table border="1" style="width: 100%; text-align: center;"> <tr> <td style="width: 33%; background-color: #00FF00;">6</td> <td style="width: 33%; background-color: #FFA500;">2</td> <td style="width: 33%; background-color: #FF00FF;">0</td> </tr> </table> <ul style="list-style-type: none"> • Yes, areas already in the UDP as non-residential. • Yes - for waste reclamation uses. • Yes of course due to accessibility. Consideration should be given to distance travelled and where it is to be used and processed. • Need to consider certain cross border issues for example Household waste site usage. But most LA's have already formed their own plans/views. • This is the most difficult question politically. 	6	2	0
6	2	0			
	<p>Additional Post-it comments:</p>	<ul style="list-style-type: none"> • Reduce, reduce, reduce. Take examples from the Inuit – they only take from the earth what they need. • Encourage people to think before they buy. Supermarkets have a strong role to play with suppliers to reduce packaging. • Leeds City Council should lead by example in the sense of minimising the use of plastic bags, promoting usage reduction. • We need the 'R's – Refuse – reduction in packaging, especially plastic bags etc. Reduce consumption generally. Re-use as much as possible; Repair items rather than replacing or disposing of them; recycle as a last resort. • Note that LCC will soon be starting work on new waste collection procurement tender. This is a great opportunity to put new approaches into action and to look for environmentally friendly innovations from waste contractors. For example waste trucks should run on methane extracted from landfill sites. • As a first priority demand reduction in waste. 			

Table E.1 Stakeholder Workshops, Post-it notes: Waste

Minerals and Aggregates

Table E.2 presents a summary of the **Minerals and Aggregates** themed post-it note responses.

Post-it note comment		About Right	Passive	Not At All
Minerals and Aggregates				
A	Is prudent use and protection of mineral resources a priority?	4	1	0
		<ul style="list-style-type: none"> • What is meant by the prudent use and protection of mineral resources? We currently import all our minerals from North Yorkshire and are saving our own high quality deposits of sand and gravel (most of which are located in environmentally sensitive areas). So it may be <i>prudent</i> to keep importing minerals to ensure continued <i>protection</i> of our more high quality reserves, BUT North Yorkshire might have a different view about whether Leeds' use of their mineral resources is prudent. • Coal is an important energy mineral recognised in the 2006 energy review by Government. Coal and other minerals should be safeguarded to prevent unnecessary sterilisation, to ensure a balanced supply can be delivered steadily across the areas where it is found. 		
B	Sites should be allocated for aggregate recycling facilities?	4	0	0
		<ul style="list-style-type: none"> • There should also be a website set up by LCC to police and allow recycling of such materials in a co-ordinated manner. 		
C	Sites should be allocated for other associated uses such as concrete batching?	3	0	0
		<ul style="list-style-type: none"> • Minerals would have to be in industrial areas away from residential areas. 		
D	We should consider what types of after use are appropriate once extraction is completed?	6	1	0
		<ul style="list-style-type: none"> • Depends on what it would be – and perhaps a priority. Is there potential for housing needs. 		
	Additional Post-it comments	<ul style="list-style-type: none"> • To obtain minerals and aggregates do not destroy nature reserves, green space or water table. See Banks Planning submission for Ledston open cast mining. • (Guard against) Impact on the environment with any new mineral extraction proposals. • After- use of former mineral working must consider ground stability to ensure safe development and use of land • Future mineral extraction should be determined by criteria-based policies which allow consideration of each environmental, ecological and social aspect. 		

Table E.2 Stakeholder Workshops, Post-it notes: Minerals and Aggregates

Land Use

Table E.3 presents a summary of **Land Use** related post-it note responses.

Post-it note comment		About Right	Passive	Not At All
Land Use				
A	Where land is contaminated to the extent that development is unviable, should the Council reasonably encourage or facilitate its development or rehabilitation through the NRWDPD?	5	1	0
		<ul style="list-style-type: none"> • Yes - create community woodlands - links to carbon sequestration • Yes - contaminated land presents public safety hazards, it offers brownfield land allocation opportunities • Yes - The vast majority of contaminated land can be decontaminated; what is required is the will • Depends on cost and need for the land to be used for a particular purpose 		
B	Suggest inter-relationships between land use and other themes of the NRWDPD, and potential areas of conflict/solutions	2	0	0
		<ul style="list-style-type: none"> • Links between land use and energy and climate change - how to co-locate housing with employment, education, health, public transport to reduce transport emissions 		

Table E.3 Stakeholder Workshops, Post-it notes: Land Use

Energy and Climate Change

Table E.4 presents a summary of post-it note responses relating to **Energy and Climate Change**.

Post-it note comment		About Right	Passive	Not At All
Energy and Climate Change				
A	Leeds has an opportunity for maximising energy production from different sources?	5	4	1
		<ul style="list-style-type: none"> • Leeds doesn't have the height for wind power or the water flow for hydropower nor the agricultural space for fuel crops • The UK as a whole needs a balanced energy supply considering all forms not always just perceived/popular renewable sources • Whilst it has the opportunity, it must be fully considered as there may be better options • Every building presents an 'opportunity' for energy generation. Need to differentiate between 'conventional' (fossil fuel) generation potential, against 'renewable' potential • District heating potential not considered? Make this (and CHP) mandatory for developments (housing) above a minimum threshold e.g. 10, those less than that to contribute to a Carbon Investment Fund. • An 'Intelligent Energy Policy' is required to respond to changes in the types of energy we use. Leeds needs to go beyond the national requirements. • Retro-fitting existing housing is often a neglected issue. There's a lot about renewable energy generation however the ideal is to increase energy efficiency. Leeds needs a mix of energy generation appropriate for our area. • Low tech solutions should be the first port of call; we should be considering high tech options as a secondary option. I'd like to see 'energy' split from 'money'; we should be saving energy not money. The two don't always go together and energy saving should be a priority. 		

		5	2	0
B	The NRWDPD should promote specific locations for energy related developments?	<ul style="list-style-type: none"> • Link to areas of urban clearance/regeneration • It would be very helpful to take the debate out of the political arena • About right but consult • On site medium/large scale renewable linked to industrial needs • Need general policy and then approach specific locations • Need to ensure that locations maximise the gains from developments. This will be substantially different depending on energy source. • Energy balance – how much energy are we wasting through land use? We should attract industry to use wasted power where it's produced, or feed into housing stock, and reducing energy wastage at home. 		
		4	1	0
C	The NRWDPD should provide criteria against which proposals will be assessed?	<ul style="list-style-type: none"> • Development must usually be based on criteria set in DPD including environmental aspects. DPD must also allow for new and novel solutions. • Yes because the decision needs to be based on clear unbiased facts • Yes - include cost effectiveness, amenity (noise), and visual impact. 		
		2	5	2
D	We will need to set a threshold above which new development will need to provide renewable energy in new developments, to meet regional requirements. Is the regional target of 10 or more dwellings / 1000m2 non residential floorspace appropriate for Leeds?	<ul style="list-style-type: none"> • Yes - however there should be a sliding scale for larger developments to have higher requirement • Depends on type of dwelling (i.e. flats, family homes) • Merton Rules ok but we need similar targets against our annual CO2 target • If regional target is 10/1000m2 is that based on cost effectiveness as to what the development will 'stand'; then less than this size should require a contribution to a bigger scheme (somewhere in Leeds "for the public good") • Definition needs to be more clearly worded. Is this based on a given %, e.g. 10% of onsite renewable energy generation, OR a trade-off potential for the developer to improve the Dwelling Emission Rate by 10% below Building Regs allowance. • I would prefer ever tighter criteria. We need to take action now to mitigate the existing non-renewable development, if totally impractical either don't build or find some other way to offset the impact • Should be more than 10 (much more) 		

Table E.4 Stakeholder Workshops, Post-it notes: Energy and Climate Change

Water Resources

Table E.5 presents a summary of **Water Resource** related post-it note responses.

Post-it note comment		About Right	Passive	Not At All
Water Resources				
		10	0	0
A	Since the Issues and Options Paper has been published, it has been found that there is insufficient information available to properly identify particular areas of drainage stress. Any proposal restricting the use of	<ul style="list-style-type: none"> • Yes - must have sustainable drainage and not concrete/tarmac gardens • Should permitted development be withdrawn for concreting/block paving over driveways, then to put in covenants for new-build? • Yes - this should link to national indicator 188 on flooding. 		

	<p>impermeable surfaces would need to be applied to the whole City area, with significant resource implications for the Council. Is this the right approach for the NRWDPD?</p>	<p>An alternative to impermeable materials is to have semi-impermeable surfaces. Also, possibility to create temporary storage reservoirs under roads at times of peak flow</p> <ul style="list-style-type: none"> • Ban unnecessary impermeable surfaces in planning • Stop so much concrete being laid. Motorways or gardens, water needs to drain • Yes - runoff into the drainage system means each property has a broadly similar impact • Yes in principle - enforcement is an issue • Mapping entire drainage systems across UK - all authorities, currently sketchy knowledge, very expensive • The document needs to get across the point that the maintenance of the drainage system is the responsibility of all those who are responsible for their own drains from agricultural drains, highway drains and sewerage drains. • Should Leeds have a blanket ban on development in the flood plain? • Perhaps there should be links between the use of impermeable surfaces in gardens and applications for dropped curbs and control the use of impermeable surfaces this way. 			
B	<p>Should water efficiency and the reduction/re-use and recycling of water resources be promoted in all new developments?</p>	<table border="1" data-bbox="760 751 1411 787"> <tr> <td style="background-color: #90EE90;">7</td> <td style="background-color: #FFA500;">0</td> <td style="background-color: #FF00FF;">0</td> </tr> </table> <ul style="list-style-type: none"> • Yes - they should be part of the conditions for the development • Should all new and existing dwellings be given a free water butt or offered one at a subsidised rate? Part funded by a levy on Yorkshire Water? • Yes - grey water storage and recycling in all new developments, ability to capture tap water and store in a tank for later use. The water could also service a pre-warm-up need for a Ground Source Heat Pump. • Grey water recycling is not a policy requirement as yet. Concerns have been raised in European Countries such as Holland over the use of grey water and whether it is safe to use. • How does the sewerage system cope with grey water – in order to accommodate the grey water large storage tanks would be required within each household. • The introduction of water metres nationally – They will perhaps be introduced in the south. The arguments against their blanket introduction are that they would discriminate against large poorer families. Although it is now possible to get Smart Metres. There were links between the metering of water and public health concerns. • The wording refers to new developments only. There is currently no 'requirement' for SUDS – this needs to be reworded to remove the suggestion that it is a requirement as it is only advisory 	7	0	0
7	0	0			
C	<p>How should the NRWDPD address meeting social and economic development needs in conjunction with protecting water quality? Is it appropriate to protect land from development in sensitive locations next to water resources, or better to treat each proposal on a case by case basis?</p>	<table border="1" data-bbox="760 1470 1411 1505"> <tr> <td style="background-color: #90EE90;">2</td> <td style="background-color: #FFA500;">0</td> <td style="background-color: #FF00FF;">0</td> </tr> </table> <ul style="list-style-type: none"> • Yes - protect land in sensitive locations 	2	0	0
2	0	0			
	<p>Land Use and Water Resources - any other issues or views?</p>	<table border="1" data-bbox="760 1759 1411 1795"> <tr> <td style="background-color: #90EE90;">3</td> <td style="background-color: #FFA500;">3</td> <td style="background-color: #FF00FF;">0</td> </tr> </table> <ul style="list-style-type: none"> • Resource depletion. Storage treatment. Groundwater depletion - how to cover/deal with • Use rail for transporting goods and I AGREE with that more waterways 	3	3	0
3	3	0			

	<ul style="list-style-type: none"> • Need to develop waterways as an alternative means of freight transport. This would reduce the traffic on strategic roads • Why has the NRWDPD limited itself to natural resources? Shouldn't natural resources come under an environment DPD? The key themes, issues and questions are piecemeal and don't paint a broader environmental picture • Key themes cover issues such as flooding and air emissions. These are environmental impacts not natural resources. However you don't cover biodiversity, flora/fauna, agriculture, forests, and streams/rivers etc as natural resources. Issues and options are piecemeal • The NRWDPD should be placed within the Environment DPD to prevent overlap, and provide greater clarity • There is an obvious need for urban green space, but how do you mediate between the need for land and the need for urban green space? This is not covered in the questionnaires; no questions about green space provision. • Issues that have been missed include resource depletion, storage issues and extraction issues.
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Table E.5 Stakeholder Workshops, Post-it notes: Water Resources

Air Quality

Table E.6 presents a summary of **Air Quality** related post-it note responses.

Post-it note comment		About Right	Passive	Not At All
Air Quality				
A	Should the NRWDPD contain policy requiring developers to provide measures that improve air quality?	3	2	2
		<ul style="list-style-type: none"> • No, but they should be required not to adversely affect it • AQMAs near SRN are a matter of concern for Highways Agency. Early consultation about proposals/developments in vicinity would be appreciated • Minimise travel demand closer to AQMAs (especially in vicinity to SRN) by more stringent requirements for TA's and TPs (Transport Assessments and Travel Plans) • Air quality must be preserved and not polluted by blasting and carrying lorry loads of dust producing products 		
	Energy, Climate Change and Air Quality - any other issues or views?	4	11	0
		<ul style="list-style-type: none"> • NRWDPD should ensure specific primary energy generation takes place • Does LCC want to be an exemplar and set standards higher than the minimum Building Regs in the DPD and Core Strategy • ESCOs could be very viable for LCC but its not on the radar at present • Set up a Carbon Investment Fund if developer cannot satisfy requirements on-site, to be administered by LCC • This document must link with the Transport DPD to tackle Air Quality issues, in particular, the need to improve public transport, establish a Park & Ride, Tram system, electric recharge points for electric vehicles. But this goes for all development - link to housing DPD and others or tackle the issue entirely within NRWDPD so long as there is no conflict with others • 1st demand reduction. Link to UK/EU targets • If promoting biomass, need to ensure it is locally sourced, not imported from Brazil etc!!! Link to a waste stream resource. 		

	<ul style="list-style-type: none"> • Can Leeds go beyond requirements of national policy on energy efficiency on new build? • Potential over-focus on energy generation. Need to contain policy on energy efficiency both retro-fitting for existing housing stock and requirement for new development • Transport - linked approach to integrated regional transport strategy, i.e. rail links to regional airport • Air quality - to be all inclusive of transport sector and reflect regional development opportunities - different levels of pollution for modes of transport • What about noise as environmental issue? • Impacts of transport and accessibility to reduce car dependency • Climate Change mitigation issues – themes of adaptation and mitigation for climate change need to be drawn out more (e.g. planting trees for CO² capture, increased biodiversity). Land use should be driven by climate change mitigation and adaptation techniques (e.g. sacrificing brownfield/contaminated land for green space, or CHP, community power schemes).
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Table E.6 Stakeholder Workshops, Post-it notes: Air Quality

Sustainability and Integration

Table E.7 presents a summary of **Sustainability** themed post-it note responses.

Post-it note comment	About Right	Passive	Not At All
Sustainability and Integration			
	0	0	1
Sustainability and Integration - any other issues or views?	<ul style="list-style-type: none"> • Make use and reference to Village Design Statements and Parish Plans • A separate Transport DPD is being produced but there should be reference to transport in this DPD. What about sustainable fuels (e.g. using anaerobic digestion to produce methane to drive vehicle fleets)? One third of land used in new housing developments is roads so a huge link to land use and other obvious links to air quality and climate change. • Climate Change has made planning for surface and ground water attenuation essential (e.g. play areas and green space incorporated in developments should be designed and created specifically as flood space for both expected fluvial discharge and also urban runoff). • A high number of themes don't always contribute to effective decision making, e.g. the new LDF breaks everything down into themes whereas the old UDP system ensured everything was in one place. • Continuous engagement is the key. Doncaster, Rotherham and Barnsley are producing a joint document; there is the potential to do the same within Leeds. Each individual DPD cannot be considered in isolation, everything needs to be integrated. Not necessarily within a joint DPD but we should be sharing information and thinking regionally. DPDs can acknowledge regional links, even through a simple diagram demonstrating geographical links and transfers of resources. 		

Table E.7 Stakeholder Workshops, Post-it notes: Sustainability and Integration

Appendix F - Questionnaire Analysis

General Responses

Key Themes

The following section presents data on the Key Themes of the NRWDPD; issue 1 on the questionnaire.

Public Response

Figure F.1 represents the relative perceived importance of key themes by questionnaire respondents. Public respondents were asked to rank the six key themes in order of importance to them, with 1 being the most important and 6 being the least. Scores were inverted to allow for cumulative perceived importance to be graphed.

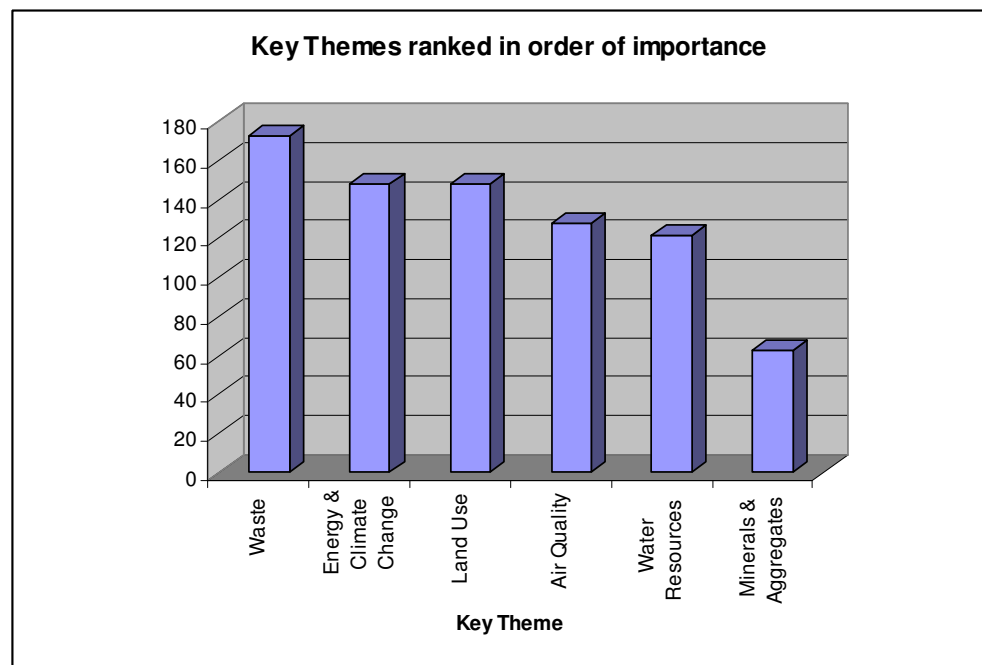


Figure F.1 Key themes ranked by questionnaire respondents in order of importance

'Waste' is the key issue for most respondents. 75.68% ranked it as the one of their top three most important issues. 56.76% ranked 'Minerals and Aggregates' as the least important issue, 18.92% ranked it as their second least important issue. One respondent assigned the first place rank to all six key themes indicating a high importance for all issues and suggesting that due to their interlinked nature, one cannot be considered more important than another.

Rank	Frequency	Percentage
1	18	48.65%
2	6	16.22%
3	4	10.81%
4	5	13.51%
5	2	5.41%
6	0	0.00%
Not specified	2	5.41%
Total	37	100.00%

Rank	Frequency	Percentage
1	2	5.41%
2	1	2.70%
3	2	5.41%
4	1	2.70%
5	7	18.92%
6	21	56.76%
Not specified	3	8.11%
Total	37	100.00%

Figure F.2 Issue 1: Waste (left); Issue 1: Minerals and Aggregates (right)

Mid-Technical Response

One respondent who filled out the mid-technical questionnaire ranked the themes. They selected 'Energy and Climate Change' as the most important theme and 'Minerals and Aggregates' as the least important theme.

Full-Technical Response

Respondents were not asked to rank themes in order of importance in this version of the questionnaire, but whether they agreed with the inclusion of the key themes in the NRWDPD. 61.54% agreed with all of the key themes; the remainder of respondents, 38.46%, did not specify a preference.

Response	Frequency	Percentage
Yes	8	61.54%
No	0	0.00%
Not specified	5	38.46%
Total	13	100.00%

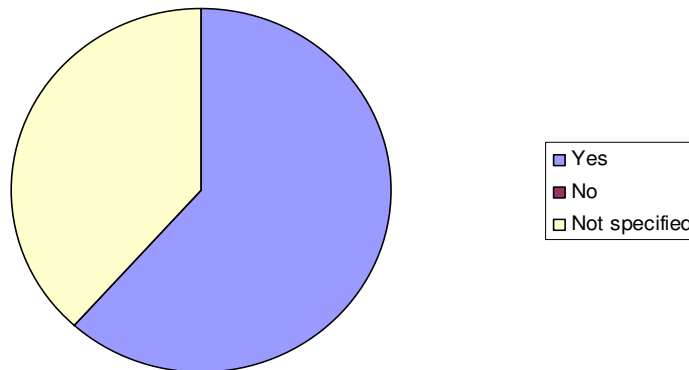


Figure F.3 Issue 1: Number of respondents who agreed with all six themes

Other Theme Considerations

Stakeholders were also asked as part of this question whether they feel there are other themes which should be included; comments entered into this section include:

Public Response

- “Use of solar power should be compulsory in all new buildings”
- “Supermarkets should keep all packaging and producers should limit the amount of packaging. All packaging should be biodegradable. How much did this paper cost? Was it recycled - expensive - could have emailed response!”
- “Probably not as important as the above, but one might consider noise and light pollution, as well as all the electromagnetic waves of different wave length we emit”
- “Food supply. Degradation of natural environment. Pollution by non-biodegradable waste. Loss of species. Human overpopulation”

Mid-Technical Response

- “Safeguarding & improving soils throughout the Leeds district – both agricultural land and within the built up area; either a new section or include in Land Use - what is more critical to everyone than food security?”

Full-Technical Response

- “Although it falls into many areas listed above (especially land use and water resources) I feel Biodiversity is a key natural resource. The value of Biodiversity in broad terms is understood but at a local level we need clearer demonstration that ecosystem services linked to bio-diverse multi-functional landscapes are key to meeting peoples needs sustainably. Soil is far more important than its position in the document reflects. Soil is a one of the key life-sustaining natural resources (along with air, sunlight, biosphere and water) and comes under considerable pressure. Soil resources need to be linked to ecosystems or agro-ecosystems that utilise natural nutrient cycles and organic matter cycles and protect soil from erosion, leeching, compaction, acidification, nutrient depletion and general degradation.”
- “Waste prevention, Re-use, Recycle / Compost, Energy, Recovery, Disposal.”

Waste

The following section presents data from the Waste section of the questionnaire.

Issue 2: Planning for future waste

Stakeholders were asked which of the following options is most appropriate for the Council to consider regarding planning for future waste. Below is a summary of responses for each of the options.

Option 1: Leeds should plan for managing its own waste only

Those stakeholders responding 'yes' and 'no' were split evenly (26.42% each). 47.17% of respondents did not specify a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	10	1	3	14	26.42%
No	8	0	6	14	26.42%
Not specified	19	2	4	25	47.17%
Total	37	3	13	53	100.00%

Figure F.4 Issue 2: Option 1

The following comments were made regarding Option 1.

Public Response

- “If each local authority has to deal with just its own waste this will focus activities on waste reduction. Concentrated facilities will promote waste reduction”
- “From past experience merging with neighbouring authorities always costs the rate payer more money”
- “Eliminates contentious politics and self serving neighbouring authorities”
- “Other authorities, especially ones with a lower carbon footprint, would see working with Leeds as a retrograde step and would resist such a plan”
- “Pay more into Leeds City Council so should be used for Leeds.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “The proximity principle strongly suggests that waste should be dealt with close to its source. Generally this will involve waste that is generated in Leeds being managed in Leeds. The import from and export to other local authorities therefore should be strongly discouraged. However, there will be areas where disposal and treatment facilities in other authorities are closer to Leeds households than Leeds facilities. Arrangements could be implemented to provide an exception to this principle. Only when clear evidence is able to show that there is a strong environmental benefit (e.g. through economies of scale) should limited import and export be allowed”.

Option 2: Leeds should work with neighbouring authorities and other regional partners to ensure a strategic approach to managing waste

67.26% said 'yes' to this option, whilst only 5.66% said 'no'. 32.08% did not specify a response.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	23	3	7	33	62.26%
No	2	0	1	3	5.66%
Not specified	12	0	5	17	32.08%
Total	37	3	13	53	100.00%

Figure F.5 Issue 2: Option 2

The following comments were made regarding Option 2.

Public Response

- “Options should be kept open for cooperation on some schemes but Leeds should not spread itself too wide”
- “Need to avoid argument about ‘who leads’ (no pun intended)”
- “A combined approach may provide wider opportunities and should minimise costs”
- “In the long term, waste management will be a national strategic problem. The more cities and towns establish common facilities then the easier it will be to influence national strategy”
- “I always think that co-operation brings more sustaining results”
- “Leeds should work with neighbouring authorities in order to be efficient e.g. if Leeds had very little of one type of waste and Kirklees a facility it could be sent there rather than setting up a new processing plant”
- “I can't imagine there would be enough space within Leeds alone”
- “Waste is a national problem, not just confined to cities - this would take care of option 3 as well”
- “Option 3 & 2 go together. Leeds is strategic; must have joined up policy with neighbouring authorities”
- “Of course, we should be strategic and onward looking.”

Mid-Technical Response

- “Some waste solutions may need minimum ‘volumes’ - economies in pooling waste streams to make viable.”

Full-Technical Response

- “The DPD should be developed in partnership with surrounding Local Authorities. They will have to handle issues of common concern in their core strategies.”
- “It should ensure it works within the LCR and with neighbouring authorities and partners to ensure we deliver a sustainable waste resource management system that maximises opportunities for reducing waste and reusing and recycling waste resources locally.”

Option 3: As part of its City Region role, should Leeds be considered as a strategic location, capable of serving a wider catchment

Just under a quarter, 24.53%, said yes to this option and 20.75% said no. Over half of respondents, 54.72%, did not specify a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	11	0	2	13	24.53%
No	4	1	6	11	20.75%
Not specified	22	2	5	29	54.72%
Total	37	3	13	53	100.00%

Figure F.6 Issue 2: Option 3

The following comments were made regarding Option 3.

Public Response

- “In terms of ‘think globally, act locally’, locally for Leeds is West Yorkshire”
- “Leeds must take a leadership role”
- “Control needs to be kept close to home”
- “Leeds can promote a strategic location for its city region.”
- “The city will benefit from economies of scale and one centre of pollution is better than several.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Whether we focus on Leeds’ waste or providing infrastructure to serve a wider market we must always focus on minimising the ecological footprint and social impacts of the waste resource system and maximise the economic and social value of the waste resources”.

Issue 2: Planning for future waste – favoured option

Findings indicate that **Option 2: Leeds should work with neighbouring authorities and other regional partners to ensure a strategic approach to managing waste** is the favoured approach to plan for future waste. 62.26% said ‘yes’ to this option (see Figure F.7).

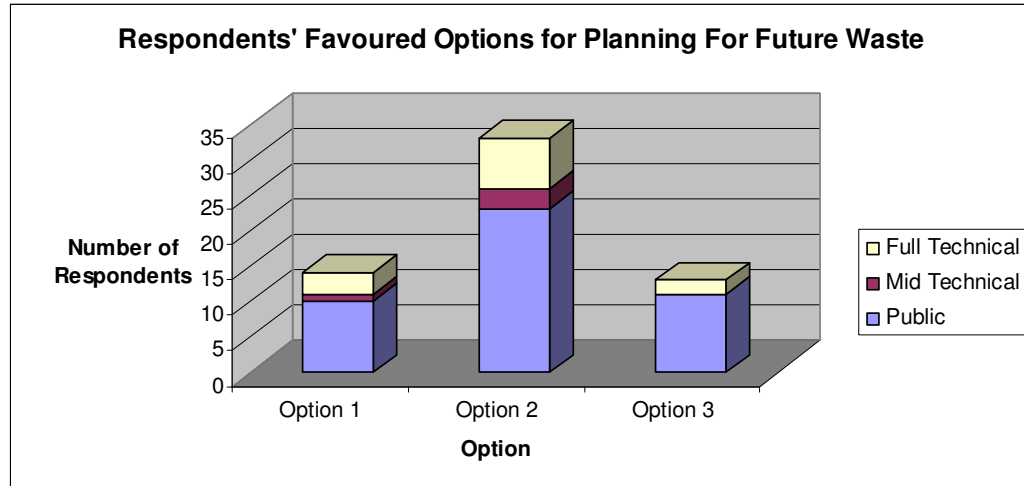


Figure F.7 Respondents' Favoured Options for planning for future waste

Issue 3: Strategic Location of New Waste Management and Transfer Facilities

Stakeholders were asked which of the following options is most appropriate for the Council to consider regarding the location of new waste management and transfer facilities. Below is a summary of responses for each of the options.

Option 1: Make provision for one or two accessible larger sites where major waste facilities for all waste streams can be located together

More stakeholders disagree than agree with this option; 16.98% said 'no' and 15.09% said 'yes'. The majority of respondents, 67.92%, did not specify a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	5	1	2	8	15.09%
No	3	0	6	9	16.98%
Not specified	29	2	5	36	67.92%
Total	37	3	13	53	100.00%

Figure F.8 Issue 3: Option 1

The following comments were made regarding Option 1.

Public Response

- "Sites should be allocated where best accessed from main road whilst minimising affect in communities."
- "Efficiency of provision, reduction in cost."
- "The fewer sites the better as we must plan for the coming decades and not produce piecemeal solutions."

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “It is regrettable that the final RSS does not include targets for waste reduction, merely a vague reference to a significant reduction in waste production. Given that there will be a waste reduction (as stated as an outcome in ENV12); it then becomes difficult to justify the construction of new waste management facilities unless the construction is designed to push waste up the waste hierarchy. Also, the regional targets for recycling are woefully inadequate (aiming at 50% by 2020) when some local authorities in the region (e.g. Ryedale with 42% of household waste being recycled) are already exceeding the 2010 target. If Ryedale are performing at this level, why can't Leeds?”
- “Option 1 and 2: Modular, rather than centralised, systems provide more local employment opportunities, can reduce the need for transport and are more easily adaptable to changes in the types and volume of waste resource they treat. Centralised infrastructure may help achieve economies of scale and mean fewer communities encounter problems associated with living near waste management facilities. Both options need to be assessed in terms of their social, economic and environmental sustainability. Centralisation is probably favourable in terms of NIMBYism (as fewer communities will have waste management facilities located near them) but modular systems and smaller local sites are more flexible and can be easier to manage in terms of achieving positive impacts on local communities and minimising negative impacts.”

Option 2: Identify a number of alternative sites distributed around the City to provide a more extensive range of options to serve the needs of all waste streams

48.08% of respondents said 'yes' to this option, and only 3.85% said 'no'. The remaining 48.08% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	16	0	9	25	48.08%
No	2	0	0	2	3.85%
Not specified	19	2	4	25	48.08%
Total	37	2	13	52	100.00%

Figure F.9 Issue 3: Option 2

The following comments were made regarding Option 2.

Public Response

- “Local facilities are needed to minimise travel, build community waste management facilities and provide more small scale flexible solutions. Single site facilities are less likely to be responsive to variations on municipal waste make up between areas. Single site facilities are also likely to be based on high capital cost engineering solutions such as incineration which are likely to fall behind other localised more flexible solutions.”
- “Sites need to be visible and accessible.”
- “Easy access for the public.”
- “Better to spread employment over a wider area.”
- “Recycling areas should be promoted in all communities.”

- “Facilities need to be as easy as possible to access. Barriers such as geographical location, in terms of distance and cost of transportation, should be removed wherever possible.”
- “There is no chance for the public to get away with their own waste, so to reduce transport smaller & easy to reach site seems more successful to me.”
- “Nobody wants a major waste site dumped on their doorstep.”
- “Option 2 is the best - if people can see/smell what they throw away they might be more encouraged to recycle!”
- “Sites need to be strategically located in relation to demand and should not generate unnecessary transportation of waste.”

Mid-Technical Response

- “Given length of plan - need range of options so that different scale solutions are possible”.

Full-Technical Response

- “There should be more small facilities for “clean waste” - i.e. plastic bottles, cans (for public use). Otherwise waste that will rot (for dustbin wagons and business).”
- “If there is a real need for additional capacity for waste treatment, then this should be located such that the collection, transportation and final disposal/shipment to market can be done as resource-efficiently as possible. This is likely to mean that recycling and treatment plants are located together (as in Option 1). On the issue of bring facilities, these should be located at widespread locations throughout the authority in locations which make it as easy as possible for householders to use. This should be accompanied by a much more thorough recycling collection system than is currently in place.”
- “Option 1 - Accessibility is key and is it fair to burden a sector of the city, purely because it has housed industry and waste sites in the past? Option 2 - this would seem fairer and reduce the number of journeys. Option 3 - new facilities should NOT only be provided in existing industrial areas.”

Option 3: New facilities should only be provided in existing industrial areas, existing landfill or waste management sites or other less sensitive locations away from residential, business parks and other uses which might be considered to be sensitive to new waste management activity

39.62% of respondents said ‘yes’ to this option and 13.21% said ‘no’. The remaining 47.17% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	19	1	1	21	39.62%
No	2	0	5	7	13.21%
Not specified	16	2	7	25	47.17%
Total	37	3	13	53	100.00%

Figure F.10 Issue 3: Option 3

The following comments were made regarding Option 3.

Public Response

- “Finding new sites would be very difficult as no-one wants them nearby. Use existing sites more intensively.”
- “To minimise damage to the environment.”
- “Option 1 is rational and an attractive option but only if it fits with option 3.”
- “There is only little native woodland left around Leeds. I would like to keep it. People will not like waste facilities next to where they live.”
- “Better use of brownfield sites should be the main priority.”
- “Safety, preservation of green land. Avoidance of “blighting” domestic properties”.
- “The effect of such sites affects the standard of life and property value.”
- “Existing sites are already mainly acceptable to the public so developing new facilities would not cause the public outcry that building additional waste disposal sites would generate. This is the “not in my backyard” feeling that would surface as people in the already industrially blighted areas would no doubt see the plant being built in their area and not in the more leafier suburbs.”
- “To stop NIMBYs.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 3 is a little restrictive.”

Issue 3: Strategic Location of New Waste Management and Transfer Facilities – favoured option

Findings indicate that ***Option 2: Identify a number of alternative sites distributed around the City to provide a more extensive range of options to serve the needs of all waste streams*** is the favoured approach to decide the location of new waste management and transfer facilities. 48.08% of respondents said ‘yes’ to this option. This was closely followed by ***Option 3: New facilities should only be provided in existing industrial areas, existing landfill or waste management sites or other less sensitive locations away from residential, business parks and other uses which might be considered to be sensitive to new waste management activity*** at 39.62% (see Figure F.7).

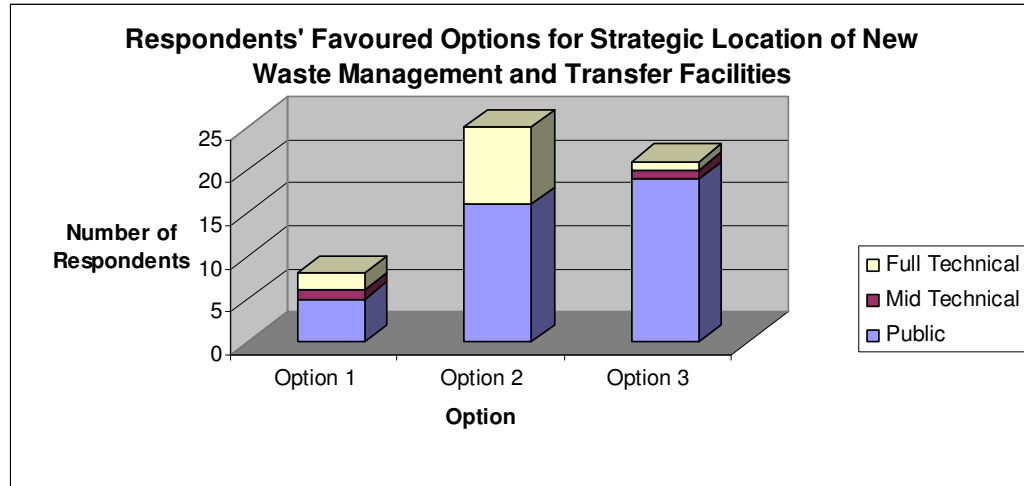


Figure F.11 Respondents' Favoured Options for Strategic Location of New Waste Management and Transfer Facilities

Issue 4: Other Locational Considerations

Stakeholders were asked which of the following options is most appropriate for the Council to consider regarding other locational considerations. Below is a summary of responses for each of the options.

Option 1: Reflect national planning guidance even in local circumstances where this might restrict certain waste management activity

Of those who responded 18.87% of respondents disagree with this option and only 11.32% said 'yes'. The remaining 69.81% did not state a preference.

Response	Frequency			Total	Percentage
	Public	Mid-Technical	Full-Technical		
Yes	5	1	0	6	11.32%
No	3	1	6	10	18.87%
Not specified	29	1	7	37	69.81%
Total	37	3	13	53	100.00%

Figure F.12 Issue 4: Option 1

The following comments were made regarding Option 1.

Public Response

Out of all those who selected Option 1 only one stakeholder gave a reason for this choice:

- “Local communities should be protected and there are sufficient brown field sites to set up waste management facilities.”

Mid-Technical Response

- “Reflect Leeds needs.”

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

Option 2: As far as possible reflect national planning guidance but seek to achieve a practical balance between environmental protection, the need to reflect local circumstances and the specific location needs of certain waste management facilities

The majority of respondents (77.36%) agree with this option and only 1.89% disagree. The remaining 20.75% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	30	2	9	41	77.36%
No	1	0	0	1	1.89%
Not specified	6	1	4	11	20.75%
Total	37	3	13	53	100.00%

Figure F.13 Issue 4: Option 2

The following comments were made regarding Option 2.

Public Response

- “Some flexibility should be retained to allow for specific circumstances locally.”
- “It is for people to decide on local issues. We might need additional facilities 'forced' upon us but to also have where they will be placed detailed outside the locality is likely to present resentment.”
- “Whilst a National strategy is necessary local conditions vary and those nearest to a problem/solution should have control.”
- “Because local people should be consulted about issues that will directly affect them.”
- “Control must be kept by the people it affects.”
- ““One size fits all” strategy is not appropriate.”
- “Each city is unique and there should be no uniform rules.”
- “Solving local issues locally is the only way to have the best solution to each problem.”
- “A balanced view which is site specific should be taken.”

Mid-Technical Response

- “Be pragmatic.”
- “Need to balance planning with local sensitivities.”

Full-Technical Response

- “Proposals for waste management facilities must be judged on their individual merits taking account of National planning guidance and local circumstances to provide a balanced decision. The surrounding countryside and green belt must be considered for non-landfill waste developments due to the constraints of the urban areas of Leeds. This approach to locating new non-landfill waste management facilities has been adopted elsewhere in the country for example in the South East which has been evaluated at Public Inquiry and subsequently endorsed.”

- “As far as possible reflect national planning guidance but seek to achieve a practical balance between environmental protection, the need to reflect local circumstances and the specific location needs of certain waste management facilities. Departure from national and regional planning policy should only be considered where there is an environmental benefit to be gained from doing so.”
- “The spirit of the regulations should be followed but with intelligent interpretation to deliver more sustainable waste resource systems.”

Issue 4: Other Locational Considerations – favoured option

Findings indicate that **Option 2: As far as possible reflect national planning guidance but seek to achieve a practical balance between environmental protection, the need to reflect local circumstances and the specific location needs of certain waste management facilities** is the favoured approach when considering other locations. 77.36% said yes to this option (see Figure F.14).

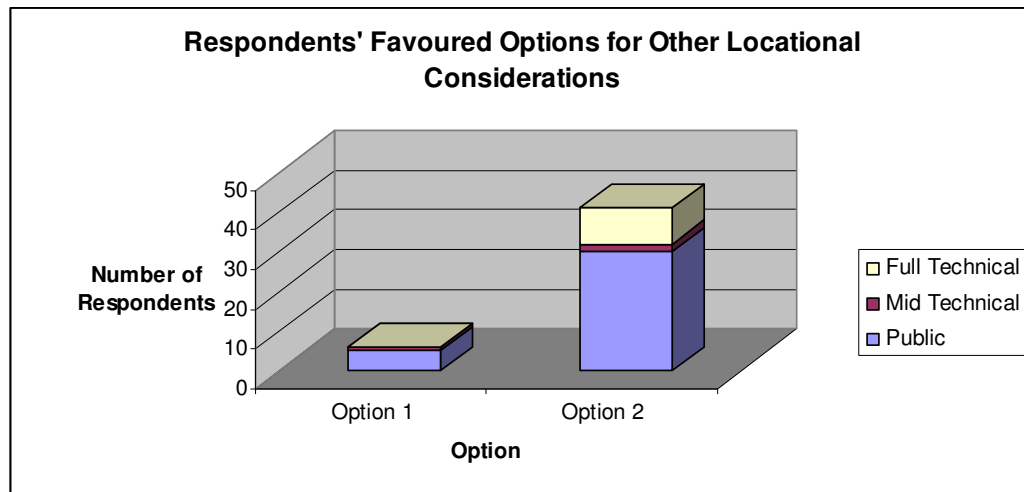


Figure F.14 Respondents' Favoured Options for Other Locational Considerations

Issue 5: Landfill provision

Stakeholders were asked which of the following options is best to help Leeds plan for landfill provision of waste that cannot be re-used, recycled or recovered during the transition to their aspirational 'zero waste' target. Below is a summary of responses for each of the options.

Option 1: If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits

The majority of respondents, 71.70%, agree with this option and only 1.89% disagree. The remaining 26.42% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	28	2	8	38	71.70%
No	0	0	1	1	1.89%
Not specified	9	1	4	14	26.42%
Total	37	3	13	53	100.00%

Figure F.15 Issue 5: Option 1

The following comments were made regarding Option 1.

Public Response

- “Some landfill outside Leeds could be considered as well as using existing sites and ex-mineral sites”
- “Restricting ourselves to existing landfill and former mineral deposits will concentrate and focus us on recycling waste. 20% by 2010 is achievable”
- “Contaminated land should be kept to a minimum so that in later years they will be easier to clear up”
- “New site shouldn't be an option; perhaps investigate incineration?”
- “Waste generated by Leeds should be tackled by Leeds. Authorities on our boundaries will refuse our waste”
- “Backfilling former quarries would be most efficient and not pass the burden of landfill sites onto other cities outside Leeds”
- “Hopefully this will minimise damage to the majority of the area”
- “Planners should be able to estimate the amount of waste which needs to be accommodated in the transitional period and therefore back filling of former mineral sites and extending landfill sites should only be for a limited period”
- “Landfill could be reduced rapidly and the need for extra sites removed if the council is proactive, efficient and innovative. If landfill is necessary it should be contained within existing sites to limit environmental impact”
- “We should be making provision for more and more recycling and reduce areas of landfill as much as possible.”
- “Restricting landfill sites will ensure that we work towards zero waste enthusiastically.”
- “Minimising additional landfill options forces maximum attention to achieving 'zero waste' ASAP.”

Mid-Technical Response

- “Use existing sites first, new sites should be as a last resort.”

Full-Technical Response

- “If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits. Friends of the Earth agree with aspiration towards zero waste. We are convinced that the amount of additional waste going to landfill can be significantly reduced through the application of robust policies to reduce, reuse and recycle thus reducing the need for additional landfill capacity. ENV14 of RSS states that existing mineral and landfill sites should be used, where additional capacity is necessary.”
- “Landfill of residential wastes will always be required not just in the interim. Extensions to existing sites would be the preferred approach followed by backfilling former quarries and new landfill sites. Options 1 and 2 are not

exclusive to one another. Should the LDF seer to locate waste management facilities at landfill sites. This would restrict or sterilise the land available for landfill extension of residual wastes and hence there needs to flexibility in the plan to allow for new landfill sites to be considered.”

- Options 1 and 2 – “These options would only be relevant to the Agency if the identified/proposed sites are close to the strategic road network. Hence, the Agency would not like to comment on the issues at this stage but would like to be consulted when specific sites have been identified.”

Option 2: Make provision for additional locations for landfill

There was a small difference between those who agree with this option, 20.75% and those that disagree, 16.98%. The remaining 62.26% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	6	1	4	11	20.75%
No	5	1	3	9	16.98%
Not specified	26	1	6	33	62.26%
Total	37	3	13	53	100.00%

Figure F.16 Issue 5: Option 2

The following comments were made regarding Option 2.

Public Response

- “Everything is dependant on what is possible and practical. Option 1 above would be preferred but might not be possible.”
- ”Again, if landfill is inevitable, a mixture of all three, accordingly to need.”
- “To enable the policy to succeed.”

Mid-Technical Response

- “It is our waste but recognise that big sites elsewhere may be needed.”

Full-Technical Response

- “Option 2 may well have to include some landfill outside Leeds MD.”

Option 3: Rely on landfill provision outside Leeds

20.75% of respondents did not think it was appropriate to rely on landfill provision outside of Leeds; only 11.32% agreed with this option. The remaining 67.92% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	5	1	0	6	11.32%
No	5	0	6	11	20.75%
Not specified	27	2	7	36	67.92%
Total	37	3	13	53	100.00%

Figure F.17 Issue 5: Option 3

The following comments were made regarding Option 3.

Public Response

- “Again, if landfill is inevitable, a mixture of all three, accordingly to need.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “I am unsure which the most environmentally, economically and socially sustainable option is. I would support the most sustainable option.”

Issue 5: Landfill provision – favoured option

Findings indicate that **Option 1: If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits** is the favoured approach to landfill provision. 71.70% of respondents said ‘yes’ and as little as 1.89% said ‘no’. If extensions to existing sites and backfilling of former mineral deposits are not possible then respondents thought **Option 2: Make provision for additional locations for landfill** to be the best option rather than rely on provision outside of Leeds (see Figure F.18).

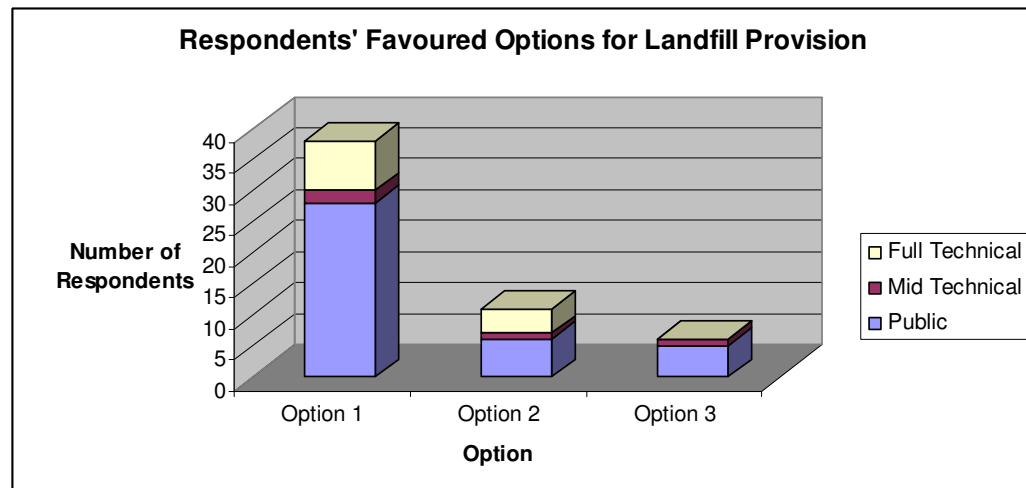


Figure F.18 Respondents' Favoured Options for Landfill Provision

Issue 6: Increasing and Encouraging Re-use, Recycling and Composting

Stakeholders were asked which of the following options is the most suitable to encourage re-use, recycling and composting. Below is a summary of responses for each of the options.

Option 1: The Council should focus on supporting and encouraging the further development of household waste sorting sites which are strategically located to serve different parts of the City

43.40% of respondents said 'yes' to this option, compared with 3.77% who said 'no'. The remaining 52.83% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	13	2	8	23	43.40%
No	1	0	1	2	3.77%
Not specified	23	1	4	28	52.83%
Total	37	3	13	53	100.00%

Figure F.19 Issue 6: Option 1

The following comments were made regarding Option 1.

Public Response

- “Various locations give local residents a chance to use sorting sites etc.”
- “The present centres are a huge success. But travel to these locations should be reduced by increasing the amount.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

Option 2: Strategic household waste sorting sites should be complimented by a broader network of smaller local bring facilities which may also include a wider choice of recycling and re-use opportunities

Over half of respondents, 52.83%, said 'yes' to this option, whilst 1.89% said 'no'. The remaining 45.28% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	19	2	7	28	52.83%
No	1	0	0	1	1.89%
Not specified	17	1	6	24	45.28%
Total	37	3	13	53	100.00%

Figure F.20 Issue 6: Option 2

The following comments were made regarding Option 2.

Public Response

- “Not everyone has a car!”
- “We need to increase recycling and reduce travelling/energy use to get to a site and discourage fly-tipping as an option”
- “More convenient and therefore more likely to be used”
- “Smaller local facilities should decrease the traffic issues”
- “At the moment I have no access to a car & have to carry glass half a mile to be recycled. This is fine for me as I am not disabled or elderly but if I was, I wouldn't be able to recycle my glass at all and would have to put it in the bin”
- “It is important to be nearer to where people live, shop, work so that recycling becomes part of their (daily) life”
- “Local facilities might make it easier for people to recycle more - we don't need to use the car to go to the bottle bank - we do to recycle other things”
- “Hopefully this would discourage fly tipping as travelling to existing sites would be reduced”

Mid-Technical Response

- “Minimise journeys needed - many people lack access to car”

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

Option 3: The Council should also provide policies which seek to encourage all developers to provide appropriate re-use and recycling opportunities when considering development proposals before, during and after construction

The majority of respondents said ‘yes’ to this option (66.04%), and only 1.89% said ‘no’. The remaining 32.08% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	27	1	7	35	66.04%
No	1	0	0	1	1.89%
Not specified	9	2	6	17	32.08%
Total	37	3	13	53	100.00%

Figure F.21 Issue 6: Option 3

The following comments were made regarding Option 3.

Public Response

- “This would be a useful addition to council provision.”
- “All waste that cannot be recycled locally should go back to the production site.”
- “Have to use a car to take certain waste to various sites. If it was nearer one could do a daily walk with waste.”

- “Developers need to be made more responsible for waste management”
- “To ensure developers take some of the responsibility for their planned activities and the effect on the environment.”
- “All three should be done. Developers should be forced to make their developments sustainable in terms of recycling, transport, buildings etc. Interaction between waste management, land use, development and planning is critical if Leeds is to change.”
- “Recycling provisions need to be readily accessible. If we are to move to a tax on say, household rubbish and NOT recycled, the argument that nearby facilities do not exist must be first eliminated.”

Mid-Technical Response

- “Recycling facilities should be built into the infrastructure of new developments”

Full-Technical Response

- “All of the above options should be deployed to increase reuse and recycling rates. The City Council needs to be much more ambitious in setting its targets. By setting higher targets, the city can raise its game to the levels achieved by the best performing authorities in the country. The aspiration mentioned in Issue 5 towards zero waste must be backed up by a robust target, strong measures to achieve that target and effective delivery of those measures.”
- “The focus on strategic sites should be important but local infrastructure and new developments should also provide improved recycling and reuse infrastructure.”

Issue 6: Increasing and Encouraging Re-use, Recycling and Composting – favoured option

Of the three options, the majority of respondents favoured Option 3: The Council should also provide policies which seek to encourage all developers to provide appropriate re-use and recycling opportunities when considering development proposals before, during and after construction (see Figure F.22). Some respondents ticked all three boxes as demonstrated by the relatively high number who said ‘yes’ for each option. One stakeholder commented: “This question is poorly worded as option 3 could be a means to achieving option 2 and therefore ticking only one box doesn’t make sense and all 3 options are not mutually exclusive. In practice the problem means that all 3 need to be implemented”.

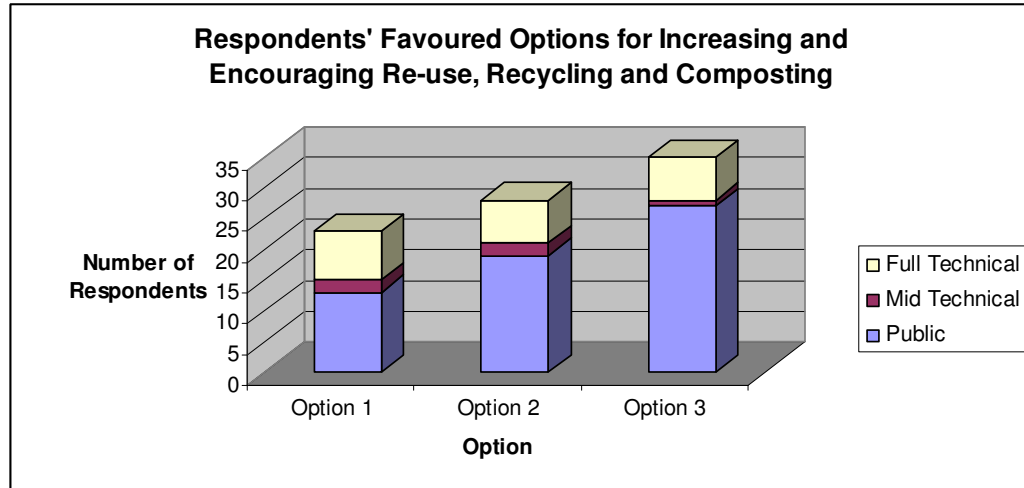


Figure F.22 Respondents' Favoured Options for Increasing and Encouraging Re-use, Recycling and Composting

Issue 7: Safeguarding Waste Sites

Technical stakeholders were asked which of the following options is most appropriate for the Council to consider regarding safeguarding waste sites. Below is a summary of responses for each of the options.

Option 1: Providing a 'protected' status for existing and future waste sites so that their status can only be changed through a review of the DPD

31.25% of respondents said 'yes' to this option and only 1.89% said 'no'. The remaining 50.00% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	0	5	5	31.25%
No	0	3	3	18.75%
Not specified	3	5	8	50.00%
Total	3	13	16	100.00%

Figure F.23 Issue 7: Option 1

The following comments were made regarding Option 1.

Mid-Technical Response

- "Pragmatic?"

Full-Technical Response

- "If you have more industry and more houses you will have more waste and nowhere to put it."
- "Will the DPD identify specific waste sites? Thus far promoting sites has been mentioned and not retention for a particular use - the AVL for example does not allocate any site for waste."

Option 2: A more flexible approach should be taken where the need for other uses may be acceptable

Slightly more respondents said ‘no’ to this option (31.25%), whilst 25.00% said ‘yes’. The remaining 43.75% of respondents did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	3	4	25.00%
No	2	3	5	31.25%
Not specified	0	7	7	43.75%
Total	3	13	16	100.00%

Figure F.24 Issue 7: Option 2

The following comments were made regarding Option 2.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “A more flexible approach should be taken where the need for other uses may be acceptable. As the authority develops, alongside a strong national framework, its effectiveness in reducing waste levels the need for waste management facilities should be reassessed regularly. This may mean that other uses of the land are considered. However, this should not lead to pressure on the land becoming such that future waste management facilities are located in sub-optimal sites due to loss of the most optimal to other developments.”
- “I think we should not constrain our land use unnecessarily. We should protect suitable waste management sites from unsuitable, unsustainable development but not from all other types of development. The most sustainable option needs to be sought.”

Issue 7: Safeguarding Waste Sites – favoured option

Only nine respondents indicated a preference for this issue, therefore it is difficult to conclude as to which is the favoured option. Slightly more respondents (31.25%) agreed that **Option 1: Providing a ‘protected’ status for existing and future waste sites so that their status can only be changed through a review of the DPD** is the best for safeguarding waste sites. However, responses for **Option 2: A more flexible approach should be taken where the need for other uses may be acceptable** were relatively evenly split and many technical stakeholders put forward the case for this option (see Figure F.25).

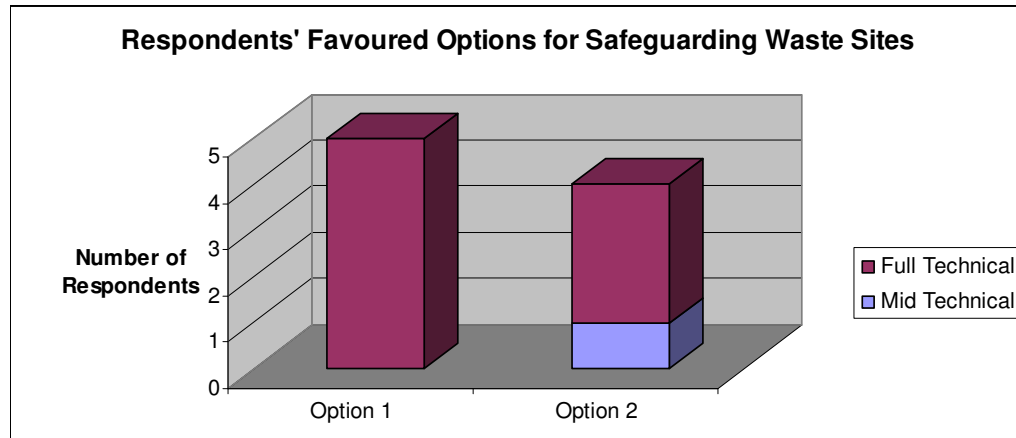


Figure F.25 Respondents' Favoured Options for Safeguarding Waste Sites

Minerals and Aggregates

The following section presents data from the Minerals and Aggregates section of the questionnaire.

Issue 8: Aggregate Provision

Technical stakeholders were asked which of the following policy options is most appropriate for the Council to consider regarding its approach to levels of aggregate extraction. Below is a summary of responses for each of the options.

Option 1: A continuation of 2001 – 2016 trends should be accepted as the basis of future aggregate provision

25.00% of respondents agree with this option, compared to 12.50% who disagree. The remaining 62.50% of respondents did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	2	2	4	25.00%
No	0	2	2	12.50%
Not specified	1	9	10	62.50%
Total	3	13	16	100.00%

Figure F.26 Issue 8: Option 1

The following comments were made regarding Option 1.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “I see no possibility of Leeds not needing some aggregate from outside the MD. Efforts must be made for Las to identify the least sensitive locations for supply.”
- “A continuation of the 2001 – 2016 trends should be accepted as the basis of future aggregate provision. Thorough analysis should be made into whether the

2001-16 trends will have an impact on the National Parks and AONBs or not. It should be an absolute guideline that such sites are not allowed to have expansion of mineral extraction from them.”

- “Leeds should aim to drastically increase aggregate reuse and recycling in order to meet its aggregate needs, a policy to encourage sustainable landscaping and construction materials is needed to reduce unsustainable demands on our aggregate resources. The assumption that market demand for aggregates will stay high holds true only if unnecessary and unsustainable consumption of aggregates continues.”

Option 2: Higher levels of one or both of the figures should be considered to reduce the need for primary aggregates produced in the National Parks and AONBs of North Yorkshire in line with RSS policy

An equal amount of respondents (25.00%) said ‘yes’ and ‘no’ to this option. The remaining 50.00% of respondents did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	3	4	25.00%
No	1	3	4	25.00%
Not specified	1	7	8	50.00%
Total	3	13	16	100.00%

Figure F.27 Issue 8: Option 2

The following comments were made regarding Option 2.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Do not destroy anymore of the countryside and wildlife. Surely materials should be recycled.”

Issue 8: Aggregate Provision – favoured options

Only nine respondents indicated a preference for this issue, therefore it is difficult to conclude as to which is the favoured option. An equal number (25%) of those who responded agreed with **Option 1: A continuation of 2001 – 2016 trends should be accepted as the basis of future aggregate provision** and **Option 2: Higher levels of one or both of the figures should be considered to reduce the need for primary aggregates produced in the National Parks and AONBs of North Yorkshire in line with RSS policy** should be considered regarding its approach to levels of aggregate extraction (see Figure F.28).

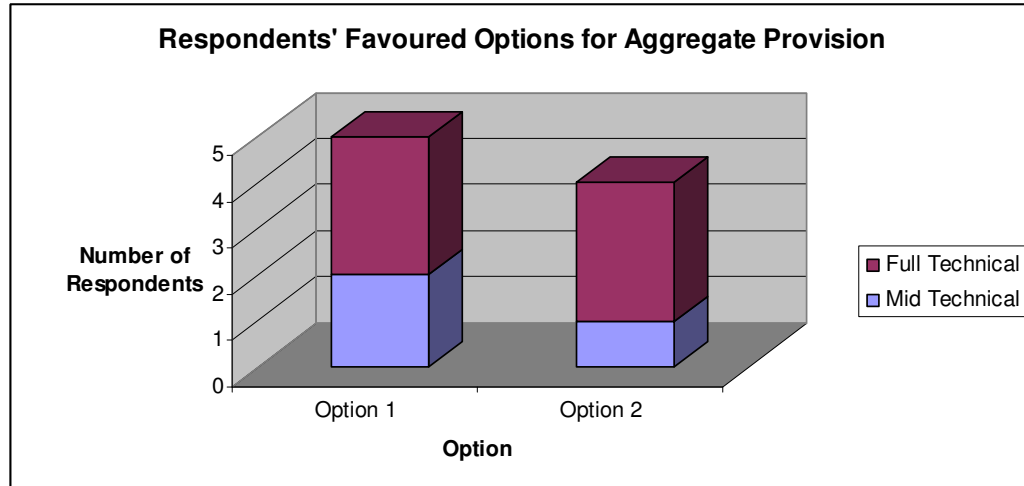


Figure F.28 Respondents' Favoured Options for Aggregate Provision

Issue 9: Sand and Gravel

Stakeholders were asked which of the following options is best given that the environmental impacts of extracting sand and gravel could potentially leave areas in Leeds badly affected. Below is a summary of responses for each of the options.

Option 1: The use of extensions to existing quarries to supply the bulk of the required resources

49.06% of respondents said 'yes' to this option and 9.43% said 'no'. The remaining 41.51% of respondents did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	19	2	5	26	49.06%
No	1	1	3	5	9.43%
Not specified	17	0	5	22	41.51%
Total	37	3	13	53	100.00%

Figure F.29 Issue 9: Option 1

The following comments were made regarding Option 1.

Public Response

- "...then could be filled with waste when supplies exhausted."

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

Option 2: The release of new sites to supply the majority of this need

26.42% of respondents said 'no' to this option, compared to 11.32% who said 'yes'. The majority of respondents (62.26%) did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	5	0	1	6	11.32%
No	7	2	5	14	26.42%
Not specified	25	1	7	33	62.26%
Total	37	3	13	53	100.00%

Figure F.30 Issue 9: Option 2

The following comments were made regarding Option 2.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Define ‘necessary’- much of the market demand for sand and gravel is not necessary or sustainable. A criteria based approach may be the best way of ensuring suitable sites are not overlooked but the criteria would need to be very detailed to ensure sustainable extraction of sand and gravel.”
- “Try and lessen the need.”
- “Using existing allocations and a criteria based policy approach without identifying new sites for development?”
- “These options would only be relevant to the Agency [Highways Agency] if the identified/proposed sites are close to the strategic road network. Hence, the Agency would not like to comment on the issues at this stage but would like to be consulted when specific sites have been identified.”

Option 3: Using existing allocations and a criteria based policy approach without identifying new sites for development

37.74% of respondents said 'yes' to this option and 3.77% said 'no'. The remaining 58.49% of respondents did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	13	2	5	20	37.74%
No	2	0	0	2	3.77%
Not specified	22	1	8	31	58.49%
Total	37	3	13	53	100.00%

Figure F.31 Issue 9: Option 3

There were no comments regarding Option 3.

Issue 9: Sand and Gravel – favoured options

Findings indicate that **Option 1: The use of extensions to existing quarries to supply the bulk of the required resources** is the favoured option for sand and gravel; 49.06% of respondents said 'yes' to this option. 37.74% of respondents also agreed with **Option 3: Using existing allocations and a criteria based policy approach without identifying new sites for development** (see Figure F.32).

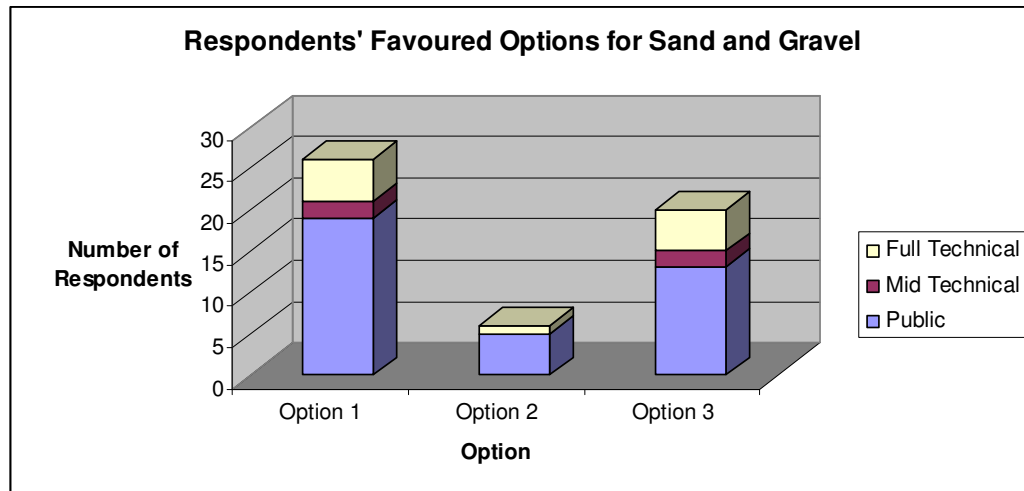


Figure F.32 Respondents' Favoured Options for Sand and Gravel

Issue 10: Sand and Gravel – Identification and Release of Additional Resources

Technical stakeholders were asked which of the following options is best for the Council to identify and release additional resources. Below is a summary of responses for each of the options.

Option 1: The identification of broad areas of search

25.00% of respondents said 'no' to this option, compared to 18.75% who said 'yes'. The remaining 56.25% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	2	3	18.75%
No	1	3	4	25.00%
Not specified	1	8	9	56.25%
Total	3	13	16	100.00%

Figure F.33 Issue 10: Option 1

The following comments were made regarding Option 1.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Whichever destroys the least green area”.

Option 2: The identification of preferred areas within these search areas

37.50% of respondents said ‘no’ to this option and only 6.25% said ‘yes’. The remaining 56.25% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	0	1	1	6.25%
No	2	4	6	37.50%
Not specified	1	8	9	56.25%
Total	3	13	16	100.00%

Figure F.34 Issue 10: Option 2

There were no comments regarding Option 2.

Option 3: The identification of additional site allocations with detailed boundaries to be defined in the DPD

More respondents said ‘yes’ to this option (31.25%) than respondents that said ‘no’ (25.00%). The remaining 43.75% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	4	5	31.25%
No	1	3	4	25.00%
Not specified	1	6	7	43.75%
Total	3	13	16	100.00%

Figure F.35 Issue 10: Option 3

There were no comments regarding Option 3.

Option 4: Not identifying any preferred area or site allocations, but instead using a criteria based policy approach, which would be applicable across the whole District

More respondents said ‘yes’ to this option (37.50%) than said ‘no’ (12.50%). The remaining 50.00% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	3	3	6	37.50%
No	0	2	2	12.50%
Not specified	0	8	8	50.00%
Total	3	13	16	100.00%

Figure F.36 Issue 10: Option 4

The following comments were made regarding Option 4.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “I like the sound of criteria based policy approaches as they do not lock decision makers into a site-based approach that might mean new more sustainable sites not identified previously would be overlooked in favour of less suitable sites. Criteria must lead to the most sustainable options being developed.”

Option 5: Looking for preferred areas or site allocations outside existing resource areas

37.50% of respondents said ‘no’ to this option and 6.25% said ‘yes’. The remaining 56.25% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	0	1	1	6.25%
No	2	4	6	37.50%
Not specified	1	8	9	56.25%
Total	3	13	16	100.00%

Figure F.37 Issue 10: Option 5

There were no comments regarding Option 5.

Issue 10: Sand and Gravel – Identification and Release of Additional Resources – favoured options

Findings indicate that **Option 4: Not identifying any preferred area or site allocations, but instead using a criteria based policy approach, which would be applicable across the whole District** is the favoured approach to identify and release additional sand and gravel resources, 37.50% of respondents said yes to this option. A relatively high percentage of stakeholders, 31.25%, also said yes to **Option 3: The identification of additional site allocations with detailed boundaries to be defined in the DPD**. Options 1, 2 and 5 were not considered appropriate (see Figure F.38).

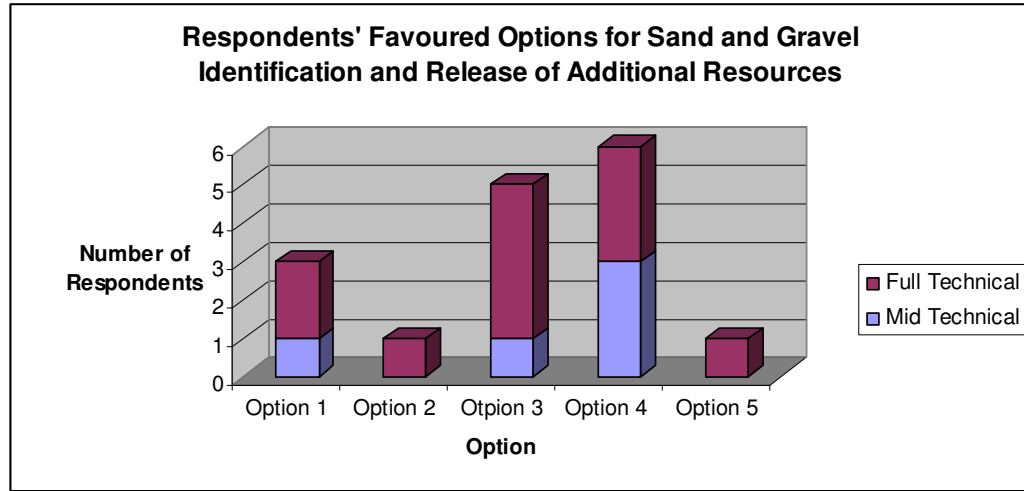


Figure F.38 Respondents' Favoured Options for Sand and Gravel – Identification and Release of Additional Resources

Issue 11: Sand and Gravel – environmental impacts

Stakeholders were asked which of the following policy options is best for the Council to consider regarding the environmental impacts of sand and gravel extraction. Below is a summary of responses for each of the options.

Option 1: Should any of the existing resource areas have clear limits placed upon further sand and gravel extraction due to environmental and/or other impacts?

54.72% of respondents said 'yes' to this option and only 7.55% said 'no'. The remaining 37.74% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	24	1	4	29	54.72%
No	1	1	2	4	7.55%
Not specified	12	1	7	20	37.74%
Total	37	3	13	53	100.00%

Figure F.39 Issue 11: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 1 is a question.”

Option 2: Are there other potential resource areas that can be identified for consideration?

Slightly more respondents said ‘yes’ to this option (18.87%) compared to 15.09% who said ‘no’. The remaining 66.04% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	6	0	4	10	18.87%
No	4	2	2	8	15.09%
Not specified	27	1	7	35	66.04%
Total	37	3	13	53	100.00%

Figure F.40 Issue 11: Option 2

The following comments were made regarding Option 2.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 2 is a question, not a policy option. Without knowing the location of amenities Option 2 cannot be answered.”

Option 3: Focus on continuing levels of extraction at present rates, having regards to regional guidelines covering sub-regional apportionment for West Yorkshire and reflecting emerging RSS policy

26.42% of respondents said ‘yes’ and 9.43% said ‘no’ to this option. The remaining 64.15% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	8	3	3	14	26.42%
No	1	0	4	5	9.43%
Not specified	28	0	6	34	64.15%
Total	37	3	13	53	100.00%

Figure F.41 Issue 11: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 3. NO. Do not focus on maintaining extraction at present rates as the present rate of extraction is unsustainable. Reduce extraction rates to meet ‘need’ not ‘demand’.”

Issue 11: Sand and Gravel – environmental impacts – favoured option
 Findings indicate that the majority of respondents said yes to **Option 1: Should any of the existing resource areas have clear limits placed upon further sand and gravel extraction due to environmental and/or other impacts?** 54.74% agree that clear limits should be placed on further sand and gravel extraction due to environmental and/or other impacts (see Figure F.42).

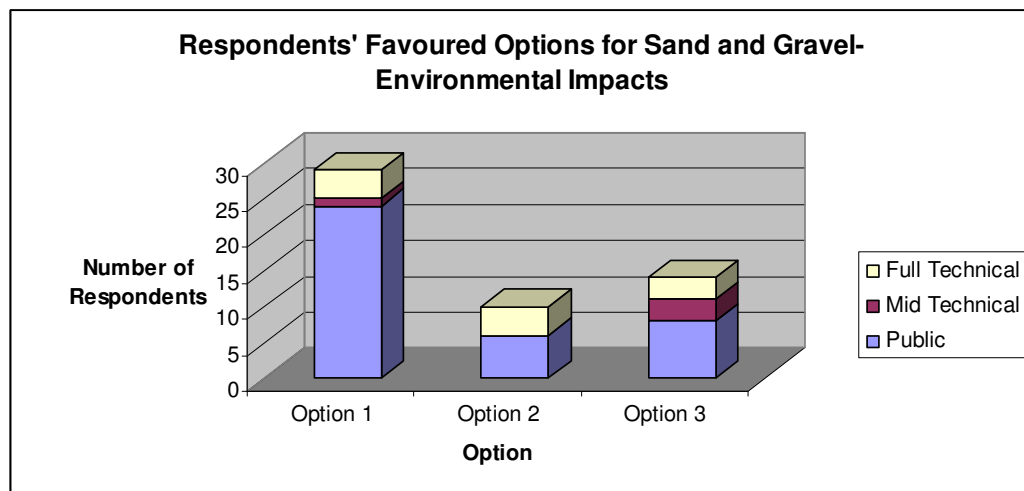


Figure F.42 Respondents' Favoured Options for Sand and Gravel – Environmental Impacts

Issue 12: Crushed Rock

Technical stakeholders were asked which of the following policy options is best for the Council to consider relating to the provision of crushed rock. Below is a summary of responses for each of the options.

Option 1: No change to existing situation

31.25% of respondents said ‘yes’ and 6.25% said ‘no’ to this option. The remaining 62.50% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	4	5	31.25%
No	1	0	1	6.25%
Not specified	1	9	10	62.50%
Total	3	13	16	100.00%

Figure F.43 Issue 12: Option 1

There were no additional comments on Option 1.

Option 2: Designate new areas as potential sites for future exploration and include criteria for future exploration

12.50% of respondents said yes and 31.25% said no to this option. The remaining 56.25% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	2	0	2	12.50%
No	1	4	5	31.25%
Not specified	0	9	9	56.25%
Total	3	13	16	100.00%

Figure F.44 Issue 12: Option 2

The following comments were made regarding Option 2.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “If yes [to Option 1], we need criteria to ensure policies enforce extraction operations to minimise negative impacts including noise, PM10 particles, other pollution, transport impacts etc. Again I favour a criteria based approach but ONLY if the criteria lead to more sustainable use of crushed rock.”

Issue 12: Crushed Rock – favoured option

Findings indicate that the majority of respondents favour **Option 1: No change to existing situation**; 31.25% of respondents said 'yes' to this option which means no new sites should be designated as potential sites for future exploration (see Figure F.45).

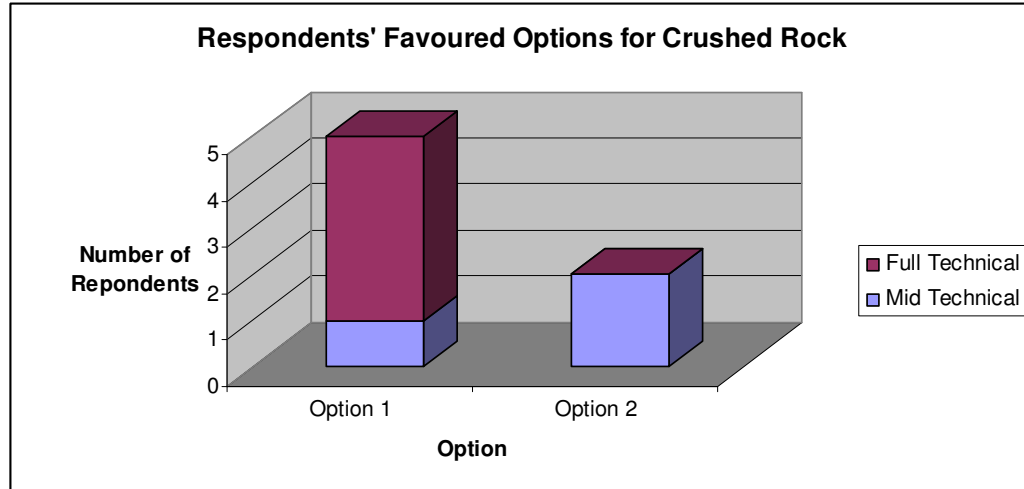


Figure F.45 Respondents' Favoured Options for Crushed Rock

Issue 13: Building Stone

Stakeholders were asked which of the following options is best for the Council to consider relating to the future of building stone reserves. Below is a summary of responses for each of the options.

Option 1: Should the known reserves of dimension stone be subject to Mineral Consultation Area designation in order to protect the resource?

The majority 50.94% of respondents said 'yes' to this option and 1.89% said 'no'. The remaining 47.17% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	21	2	4	27	50.94%
No	0	0	1	1	1.89%
Not specified	16	1	8	25	47.17%
Total	37	3	13	53	100.00%

Figure F.46 Issue 13: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “If there is an increased demand for building stone products that cannot be met by existing quarries, should there be a preference for these to be extended?”
- “Option 1. YES. But don’t exclude land uses that are more sustainable than developing building stone quarries (or desirable) for the MCA/ Leeds as a whole.”

Option 2: If there is an increased demand for building stone products that cannot be met by existing quarries, should there be a preference for these to be extended?

30.19% of respondents said ‘yes’ to this option and 11.32% said ‘no’. The remaining 58.49% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	12	1	3	16	30.19%
No	3	1	2	6	11.32%
Not specified	22	1	8	31	58.49%
Total	37	3	13	53	100.00%

Figure F.47 Issue 13: Option 2

The following comments were made regarding Option 2.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 2. NOT NECESSARILY. If extending the quarry is more sustainable than opening a new one then yes. If extending the quarry is less sustainable than opening a new one then no.”

Option 3: Should new ones [stone reserves] be permitted?

22.64% of respondents said ‘no’ to this option and 11.32% said ‘yes’. The remaining 66.04% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	3	2	1	6	11.32%
No	7	1	4	12	22.64%
Not specified	27	0	8	35	66.04%
Total	37	3	13	53	100.00%

Figure F.48 Issue 13: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 3. Yes but only if permitting new quarries means the negative environmental and social impacts of using local building stone will be less than the negative environmental and social impacts of using imported stone.”

Issue 13: Building Stone – favoured option

Findings indicate that the majority of respondents favour **Option 1: Should the known reserves of dimension stone be subject to Mineral Consultation Area designation in order to protect the resource?** 50.94% of respondents said ‘yes’ to this option (see Figure F.49).

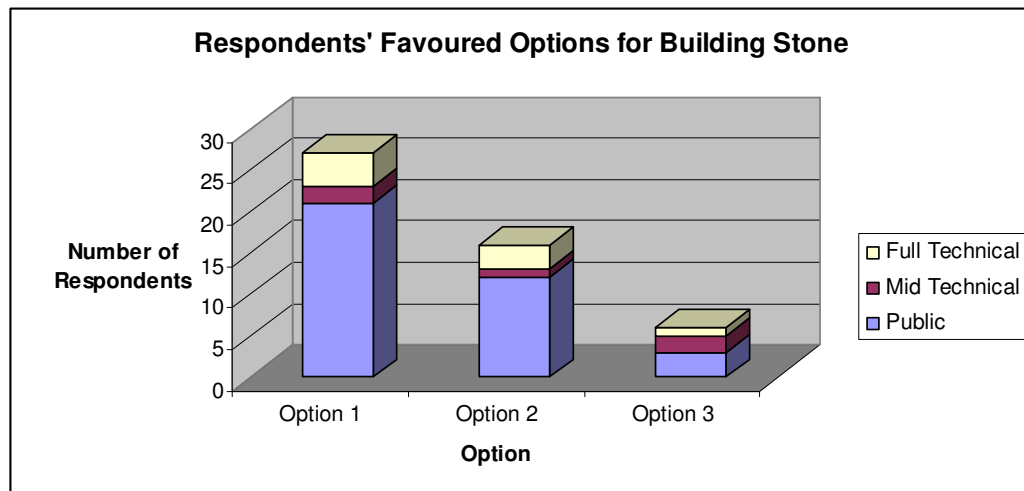


Figure F.49 Respondents' Favoured Options for Building Stone

Issue 14: Coal

Stakeholders were asked which of the following options is best for the Council to consider relating to opencast coal developments. Below is a summary of responses for each of the options.

Option 1: Simply acknowledge the presence of the coal reserve and continue with the existing approach set out in saved policies

47.17% of respondents agree with this option and only 3.77% disagree. The remaining 49.06% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	18	3	4	25	47.17%
No	1	0	1	2	3.77%
Not specified	18	0	8	26	49.06%
Total	37	3	13	53	100.00%

Figure F.50 Issue 14: Option 1

The following comments were made regarding Option 1

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Support for coal extraction within existing mineral operations should be present in any policy where existing infrastructure is in place. This would facilitate coal removal prior to site restoration thereby avoiding any potential straculation of reserves.”
- “It should be recognised that coal is a fossil fuel and, as such, when burnt contributes to climate change. It is unlikely that appropriate carbon capture and storage technologies will be available in the immediate future to allow coal to be burnt without this impact. Friends of the Earth are encouraging the UK Government to make a step change in its adoption of renewable energy systems and it is unlikely that coal will continue to play such a prominent part in the UK energy mix.”
- “Coal is not a sustainable resource. We need to develop other sources of energy rather than extracting more coal. Perhaps criteria could be developed that ensure future exploitation offsets the need to exploit even less sustainable sources of energy (such as lower quality coal deposits outside the LCC boundary) elsewhere but I doubt this would actually lead to a more efficient use of our energy resources.”
- “Support for coal extraction within existing mineral operations should be present in any policy. Where existing infrastructure is in place they would facilitate coal removal prior to site restoration thereby avoiding any potential sterilisation of reserves.”

Option 2: Designate identified locations as Mineral Consultation Areas and include criteria for future exploitation

35.85% of respondents agree with this option and 18.87% disagree. The remaining 45.28% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	16	0	3	19	35.85%
No	4	2	4	10	18.87%
Not specified	17	1	6	24	45.28%
Total	37	3	13	53	100.00%

Figure F.51 Issue 14: Option 2

There were no additional comments regarding Option 2.

Issue 14: Coal – favoured options

Findings indicate that both options should be considered. 47.17% said that **Option 1: Simply acknowledge the presence of the coal reserve and continue with the existing approach set out in saved policies** is the best approach, whilst 35.85% of respondents favoured **Option 2: Designate identified locations as Mineral Consultation Areas and include criteria for future exploitation** (see Figure F.52).

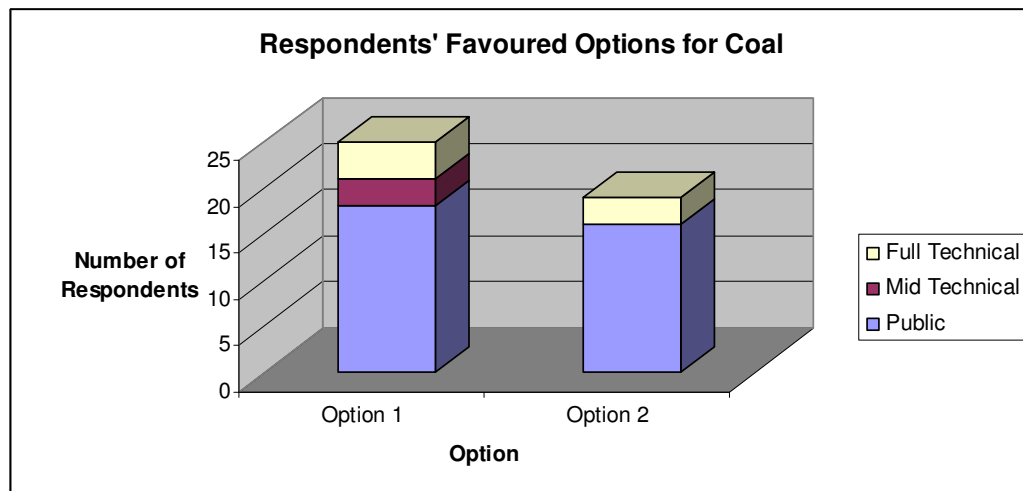


Figure F.52 Respondents' Favoured Options for Coal

Issue 15: Concrete Batching and Asphalt Facilities

Stakeholders were asked which of the following options is best for the Council to consider relating to the location of concrete batching and asphalt facilities. Below is a summary of responses for each of the options.

Option 1: Identify existing facilities and a range if additional sites which would be suitable for this or use only in the future (The public questionnaire did not give this option.)

37.50% of respondents disagree with this option and only 6.25% agree. The remaining 56.25% did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	0	1	1	6.25%
No	2	4	6	37.50%
Not specified	1	8	9	56.25%
Total	3	13	16	100.00%

Figure F.53 Issue 15: Option 1

There were no additional comments regarding Option 1.

Option 2: Include a safeguarding policy for existing sites, acknowledge the need for new facilities and provide a suite of criteria based policies to assess future proposals for batching plants

58.49% of respondents agree with this option and only 5.66% disagree. The remaining 35.85% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	23	2	6	31	58.49%
No	2	0	1	3	5.66%
Not specified	12	1	6	19	35.85%
Total	37	3	13	53	100.00%

Figure F.54 Issue 15: Option 2

There were no additional comments regarding Option 2.

Option 3: Provide policy guidance on appropriate locations such as existing mineral processing plants; industrial estate locations, shared facilities at railheads and wharves already serving similar uses

41.51% of respondents agree with this option and only 3.77% disagree. The remaining 54.72% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	14	2	6	22	41.51%
No	1	1	0	2	3.77%
Not specified	22	0	7	29	54.72%
Total	37	3	13	53	100.00%

Figure F.55 Issue 15: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 3 (YES) - there should be policy guidance on appropriate location of concrete batching and asphalt facilities.”
- “Provide policy guidance on appropriate locations such as existing mineral processing plants; industrial estate locations, shared facilities at railheads and wharves already serving similar uses.”

Issue 15: Concrete Batching and Asphalt Facilities – favoured options

Findings indicate that **Option 2: Include a safeguarding policy for existing sites, acknowledge the need for new facilities and provide a suite of criteria based policies to assess future proposals for batching plants** is the favoured approach to locate concrete batching and asphalt facilities. 58.49% said yes to this option. Several respondents, 41.54%, also selected **Option 3: Provide policy guidance on appropriate locations such as existing mineral processing plants; industrial estate locations, shared facilities at railheads and wharves already serving similar uses** (see Figure F.56).

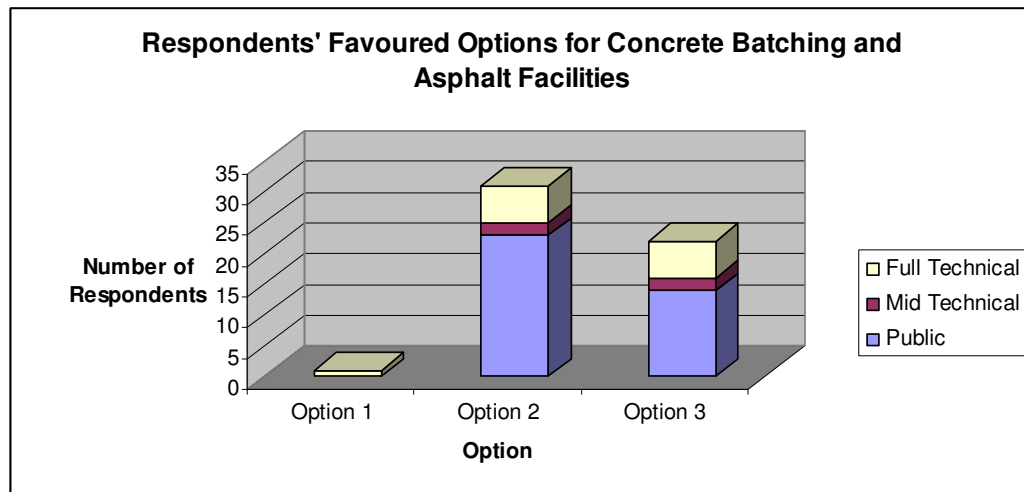


Figure F.56 Respondents' Favoured Options for Concrete Batching and Asphalt Facilities

Issue 16: Recycled Materials

Stakeholders were asked which of the following options is best for the Council to consider regarding the preferred locations for aggregate recycling facilities. Below is a summary of responses for each of the options.

Option 1: Existing mineral sites, especially those that import construction and demolition and excavation wastes

49.06% of respondents said 'yes' to this option and only 3.77% said 'no'. The remaining 47.17% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	18	2	6	26	49.06%
No	0	1	1	2	3.77%
Not specified	19	0	6	25	47.17%
Total	37	3	13	53	100.00%

Figure F.57 Issue 16: Option 1

There were no additional comments regarding Option 1.

Option 2: Former mineral workings with suitable hardstanding areas

24.53% of respondents said 'yes' to this option and 11.32% said 'no'. The remaining 64.15% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	7	1	5	13	24.53%
No	3	1	2	6	11.32%
Not specified	27	1	6	34	64.15%
Total	37	3	13	53	100.00%

Figure F.58 Issue 16: Option 2

There were no additional comments regarding Option 2.

Option 3: Appropriate industrial estate locations that are close to main sources of construction and demolition and excavation waste arisings.

37.74% of respondents said 'yes' to this option and 5.66% said 'no'. The remaining 56.60% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	11	2	7	20	37.74%
No	2	0	1	3	5.66%
Not specified	24	1	5	30	56.60%
Total	37	3	13	53	100.00%

Figure F.59 Issue 16: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “The location of aggregate recycling facilities is a matter of the Agency’s [Highways Agency] interest. However, the Agency would only be interested in a particular site if it is in close proximity to the strategic road network or might have a considerable impact on the same. Hence, the Agency would not directly comment on these options but would like to be consulted when specific sites have been identified. Option 3- Yes. The Agency recognises that there is a growing need for building material due to the widespread construction activity in Leeds. In order to minimise the import of building material, recycling initiatives should be encouraged. There should be policy guidance on appropriate location of aggregate recycling facilities.”
- “Appropriate industrial estate locations that are close to the main sources of construction and demolition and excavation waste arising.”

Option 4: Continue to encourage recycling initiatives generally, but provide a policy that sets out criteria for assessing the location of facilities

39.62% of respondents said ‘yes’ to this option and 3.77% said ‘no’. The remaining 56.60% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	15	1	5	21	39.62%
No	0	1	1	2	3.77%
Not specified	22	1	7	30	56.60%
Total	37	3	13	53	100.00%

Figure F.60 Issue 16: Option 4

The following comments were made regarding Option 4.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 4 may well identify sites that are included in Options 2 and 3.”

Issue 16: Recycled Materials – favoured options

Findings indicate that respondents did not consider any single one of the options preferable. 49.06% of respondents said yes to **Option 1: Existing mineral sites, especially those that import construction and demolition and excavation wastes** are preferred locations for aggregate recycling facilities. However, a relatively high number also favoured **Option 4: Continue to encourage recycling initiatives generally, but provide a policy that sets out criteria for assessing the location of facilities** (39.62%) and the use of **Option 3: Appropriate industrial estate locations that are close to main sources of construction and demolition and excavation waste arisings** (37.74%) (see Figure F.61).

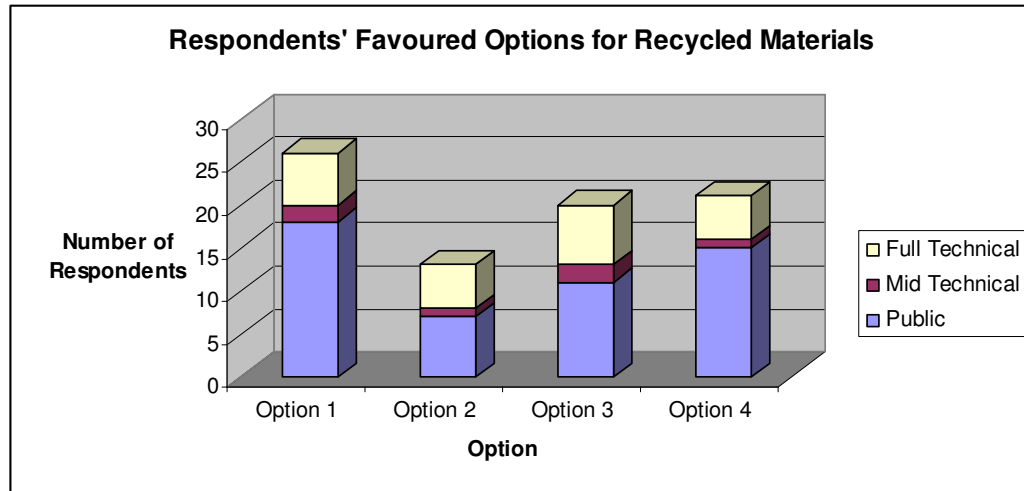


Figure F.61 Respondents' Favoured Options for Recycled Materials

Issue 17: Restoration

Stakeholders were asked which of the following options is best for the Council to consider regarding the future restoration of sites. Below is a summary of responses for each of the options.

Option 1: A restriction on backfilling of construction, demolition and excavation waste except in exceptional circumstances.

28.30% of respondents agree with this option and 9.43% disagree. The majority of respondents, 62.26%, did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	12	1	2	15	28.30%
No	1	1	3	5	9.43%
Not specified	24	1	8	33	62.26%
Total	37	3	13	53	100.00%

Figure F.62 Issue 17: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “A restriction on backfilling of construction, demolition and excavation waste except in exceptional circumstances.”
- “Do not understand. Why should backfilling be restricted? Are there more sustainable uses for the waste types mentioned?”

Option 2: An express preference for restoration at lower levels

39.62% of respondents agree with this option and 11.32% disagree. The majority of respondents, 49.06%, did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	19	0	2	21	39.62%
No	1	2	3	6	11.32%
Not specified	17	1	8	26	49.06%
Total	37	3	13	53	100.00%

Figure F.63 Issue 17: Option 2

There were no additional comments regarding Option 2.

Option 3: To allow the most economic form of restoration for quarry operators, providing they meet environmental requirements

32.08% of respondents agree with this option and 15.09% disagree. The majority of respondents, 52.83%, did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	12	2	3	17	32.08%
No	2	1	5	8	15.09%
Not specified	23	0	5	28	52.83%
Total	37	3	13	53	100.00%

Figure F.64 Issue 17: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 3: NO. Enforce the most sustainable option the most economic option might not be the most environmentally sustainable option and may have more negative impacts.”

Issue 17: After Use – favoured options

Findings indicate that respondents were not in agreement as to the best option regarding the future restoration of sites. A high percentage of respondents, across all three options, did not specify a preference for these options. Options in order of preference based on those that responded are as follows. **Option 2: An express preference for restoration at lower levels** (39.62% of respondents said ‘yes’ to this option); **Option 3: To allow the most economic form of restoration for quarry operators, providing they meet environmental requirements** (32.08% of respondents said yes to this option); and 28.30% said yes to **Option 1: A restriction on backfilling of construction, demolition and excavation waste except in exceptional circumstances** (see Figure F.65).

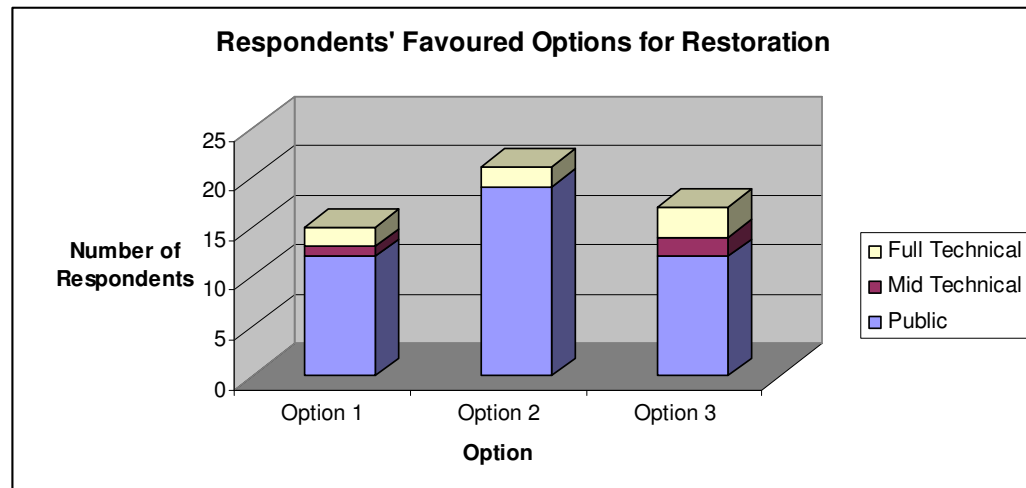


Figure F.65 Respondents' Favoured Options for Restoration

Issue 18: After Use

Stakeholders were asked to rank the following options in order of preference for how best to use and restore mineral sites after extraction with particular regard to landscape character and distinctiveness (1 being the most important and 6 being the least). Scores were inverted to allow for cumulative perceived importance to be graphed.

- Option 1: A priority for the promotion of biodiversity**
- Option 2: A priority for establishing woodland areas**
- Option 3: A priority for the protection of valuable soil resources**
- Option 4: A priority for leisure and recreation after-uses**
- Option 5: To provide guidance on other possible after-uses**

Option 6: Other open uses

Option 7: All of the above

Technical Stakeholders made the following comments about these options:

- “Friends of the Earth does not support the thermal treatment of waste unless found to absolutely necessary for environmental and health grounds.”
- “Option 4: We support and encourage new facilities and accommodation for tourists, especially in relation to the waterways. Old mineral sites and quarries adjacent to the waterway can be adapted to provide boating facilities, including marinas and mooring facilities. The Yorkshire and Humber Regional Spatial Strategy recognises the importance that waterways can make to tourism and the economy. Policy E6 (Sustainable Tourism) places an emphasis on ‘promoting tourism and associated development of an appropriate scale and type along waterways in both urban and rural areas.’ The network of inland waterways has an inherent constraint of being a “non footloose” asset, i.e. its location and alignment is fixed, and therefore it requires essential supporting infrastructure, facilities and attractions along its corridor. These essential facilities could include marinas, mooring facilities, service facilities, local tourism attractions etc. Without these facilities, the network will be unable to fully realise the tourism, leisure and recreation benefits that could be generated for the local community, or attract leisure visitors from outside Leeds.”
- “Option 7: Provide functional spaces for people (leisure, recreation, food growing, green infrastructure) and wildlife (habitat, woodland, soil). Green Infrastructure is multi-functional and provides services for people and wildlife there is no need to rank the options if a holistic approach to after use is taken.”

Issue 18: After Use – favoured options

The majority of respondents agreed that **Option 1: biodiversity** and **Option 2 woodland areas should be the priority for the after use of mineral extraction sites**. Ten respondents (18.87%) ranked Option 7 – All of the above as their favoured option (see Figure F.66).

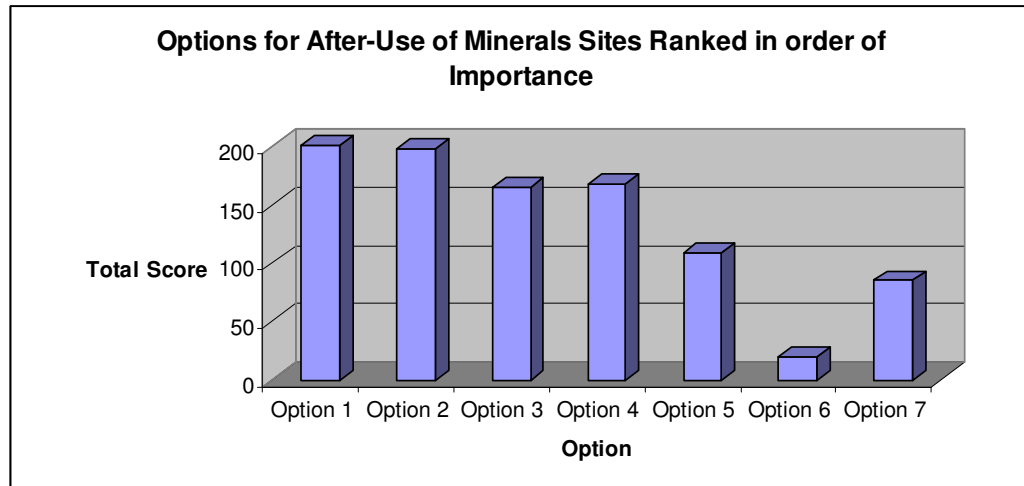


Figure F.66 Options for After-Use of Minerals Sites Ranked in order of Importance

Issue 19: Site Management

In addition to the question on ‘after use’, technical stakeholders were asked to rank the following control options in order of preference for management of after-uses in the longer term (1 being the most important and 6 being the least). Scores were inverted to allow for cumulative perceived importance to be graphed.

Option 1: Provision of a minimum of 10-year management period for sites restored to nature conservation and woodland after uses

Option 2: Provision of flexible long-term management periods for sites restored to nature conservation, where bio-diversity and / or management of recognised environmental assets are required

Option 3: Provision of a nominal 5-year management period only, as allowed currently under aftercare provisions

Only one stakeholder commented on these options:

- “Option 1: It seems to me that this will lead to better management of sites restored to nature conservation.
- Option 2: If long term means longer than 10 years.
- Option 3: 5 year management period is too short and could mean longer term problems caused by the previous land use is not remedied.”

Issue 19: Site Management – favoured options

Option 2: Provision of flexible long-term management periods for sites restored to nature conservation, where bio-diversity and / or management of recognised environmental assets are required was ranked highest by respondents. This was closely followed by **Option 1: Provision of a minimum of 10-year management period for sites restored to nature conservation and woodland after uses** (see Figure F.67).

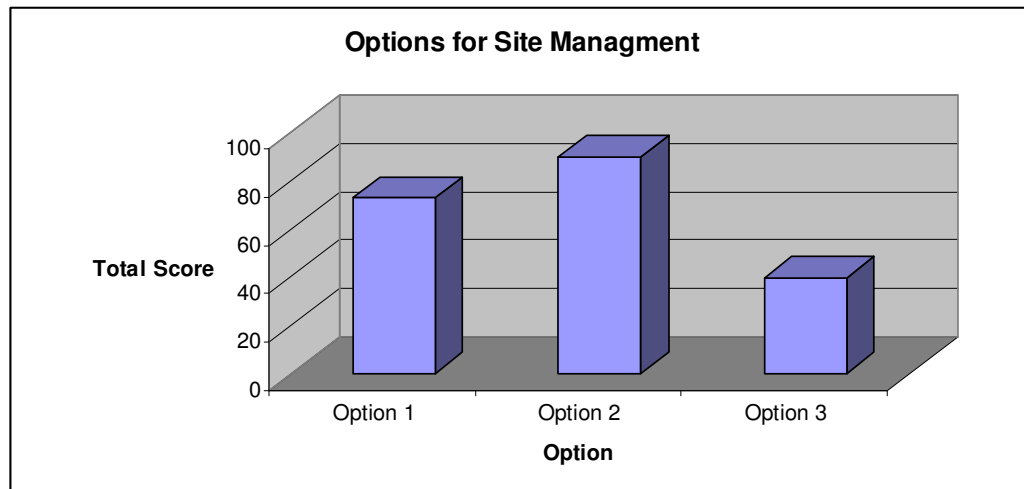


Figure F.67 Options for Site Management

Land Use

The following section presents data from the Land Use section of the questionnaire.

Issue 31: Contaminated Land

Stakeholders were asked:

In order to encourage regeneration and development of land that is contaminated should the Council offer incentives for developments? These could include an agreement to prioritise applications for development on contaminated sites, or fewer planning obligations.

64.15% of respondents agree that the council should offer incentives for development of contaminated land and 13.21% disagree. The remaining 22.64% of respondents did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	28	3	3	34	64.15%
No	5	0	2	7	13.21%
Not specified	4	0	8	12	22.64%
Total	37	3	13	53	100.00%

Figure F.68 Issue 31

The following justifications were given.

Yes

Public Response

- “But normal planning requirements should be met”
- “Impact on neighbouring communities should be a consideration”
- “Land owners should decontaminate within a reasonable time”
- “Strict regulation and decontamination”
- “Provided that the incentives are tightly controlled and openly informed”
- “Preserve farmland - food shortages will arise in near future”
- “Give suitable applicants development for free areas”
- “What about wind farms/solar generating plants etc or other kinds of renewable energy plants - not housing! Or plant contamination reducing plants which can be used for biomass power generation! And make the place look pretty-ask Meanwood valley farm!”
- “Government should fund stabilisation of ground and neutralisation of contaminated ground”
- “Each case should be on its own merits. Compromises on environment of quality of development should not be made just to solve existing problem.”
- ” To make use of existing land.”
- “I would suggest 'incentives' should restrict access to 'better', easier' sites until contaminated sites are redeveloped or tie contaminated and non-contaminated development sites together.”

Mid-Technical Response

- “Respect polluter pays but be pragmatic on getting a 'good' medium term result on different sites.”
- “Within local framework LCC.”

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

No

Public Response

- “Incentives are bribes - are they not?”
- “Do not agree with bribes”
- “The developers should be told that before building the land has to be decontaminated at their expense. The work to be checked by the council before building begins”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

Undecided

Two technical stakeholders commented that they were undecided on this issue:

- Undecided - “The development of brownfield sites should be a priority for Leeds City Council. Where these brownfield sites require remediation then this should be carried out, wherever possible, by the originator of the contamination. However, the removal of appropriate planning obligations should be avoided as these obligations ensure social and environmental benefit for communities adversely affected by development.”
- “Tricky. I can see why it is good to incentivise the regeneration of contaminated land. Removing planning obligations presents major concerns for me as planning obligations are necessary and help ensure developments reduce their negative impacts and impact more positively on surrounding communities than they would have done in the absence of conditions. Prioritising planning applications also presents a problem because if they are sped-through the system then this leaves fewer opportunities for stakeholders to comment and bring material considerations to the attention of the committee/ officer. Can't say yes or no. Depends on a site by site basis: will sustainable/ beneficial regeneration occur without incentives? Will incentives mean less suitable developments are permitted? Etc.”

Issue 31: Contaminated Land – favoured options

Findings indicate that the majority respondents, 64.15%, agree that ‘**In order to encourage regeneration and development of land that is contaminated should the Council offer incentives for developments**’ (see Figure F.69). However some of the technical respondents were undecided on this issue and expressed concern that the removal of the appropriate planning obligations should be avoided as these are put in place to ensure developments reduce their negative impacts and impact more positively on surrounding communities.

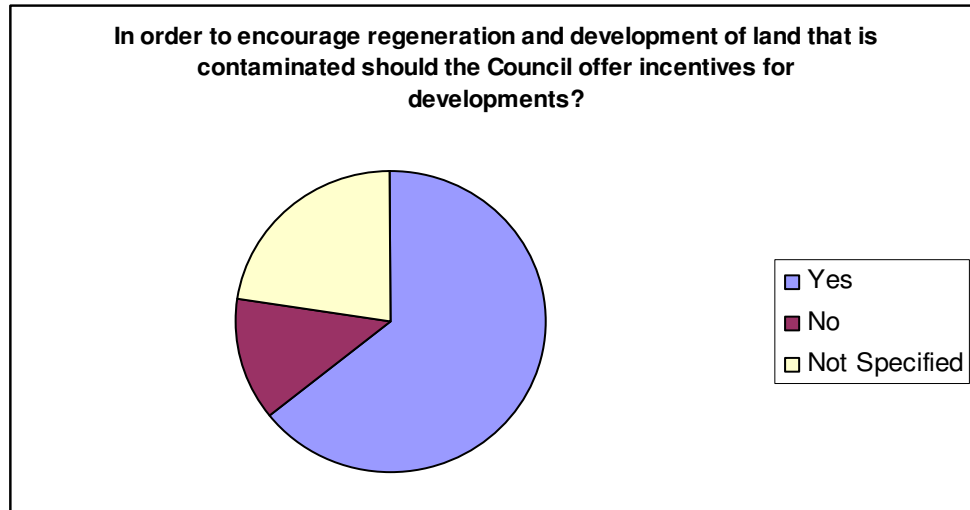


Figure F.69 Respondents' who favoured incentives for development on contaminated land

Energy and Climate Change

The following section presents data from the Energy and Climate section of the questionnaire.

Issue 20: Primary Energy Sources

Stakeholders were asked which of the following options they considered realistic in meeting Leeds' energy requirements whilst reducing reliance on fossil fuels, and reducing carbon dioxide and other greenhouse gas emissions. Stakeholders were asked to rank the options they agree with in order of importance to them, with 1 being the most important and 6 being the least. Scores were inverted to allow for cumulative perceived importance to be graphed.

Option 1: Plan for and invest in renewable energy sources as a major provider for the city?

Option 2: Plan for and invest in Combined Heat and Power (CHP) and district heating as a major provider for the city?

Option 3: Plan for and invest in other energy sources as a major provider for the City?

Option 4: Continue to rely on fossil fuels energy production (this would potentially result in penalties for the City if emissions reduction targets are not met)?

Option 5: A combination of the above?

Only two technical stakeholders commented:

- "Climate change is the greatest environmental threat facing the planet. There are opportunities to tackle climate change through a mixture of energy efficiency and deployment of renewable energy. The Stern Report highlighted the fact that failing to act on climate change would be far more economically damaging than taking

action. We need to act to vastly increase our proportion of energy generated from renewable sources and Leeds must play its part in doing this.”

- “Option 5: A combination of wind, micro hydro, solar PV, solar heating, ground source heat pumps, geothermal energy (if applicable), biomass (sustainable managed/ waste biomass) and other renewable technologies. Decentralised energy production and transmission (on site micro-generation and CHP schemes), large scale generation as appropriate.”

Issue 20: Primary Energy Sources

Option 1: Plan for and invest in renewable energy sources as a major provider for the city was given the highest overall rank by respondents. This was closely followed by **Option 2: Plan for and invest in Combined Heat and Power (CHP) and district heating as a major provider for the city.** 5 (9.43%) of the respondents ranked **Option 5: A combination of the above** as their number one choice (see Figure F.70).

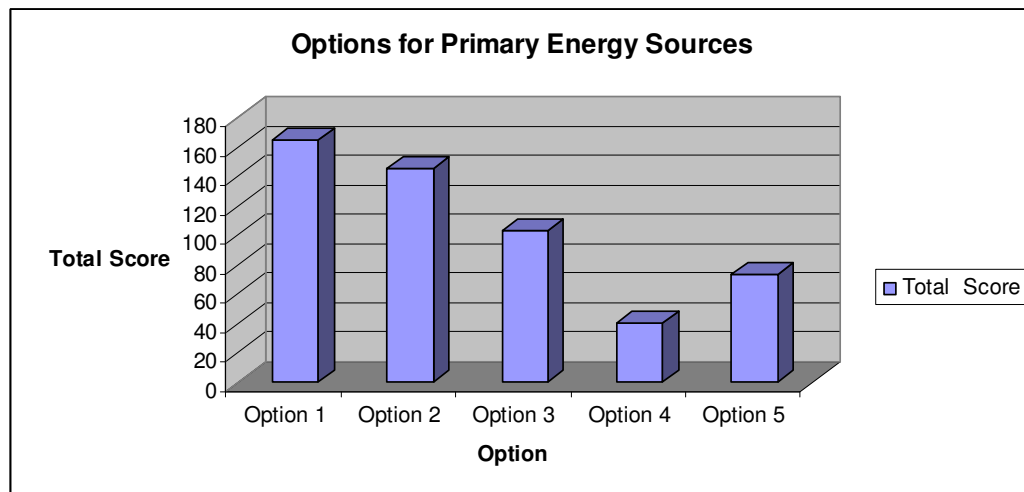


Figure F.70 Options for Energy Sources

Issue 21: Oil and Gas

Stakeholders were asked which of the following options is best for the Council to consider regarding oil and gas storage. Below is a summary of responses for each of the options.

Option 1: Is there a need for policies specifically relating to storage of gas on the basis of local geological circumstances with areas that are potentially suitable for storage, if any, to be identified in the DPD?

31.35% of respondents said ‘yes’ to this option and 6.25% said ‘no’. The majority of respondents (62.50%) did not state a preference for this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	2	3	5	31.25%
No	0	1	1	6.25%
Not specified	1	9	10	62.50%
Total	3	13	16	100.00%

Figure F.71 Issue 21: Option 1

There were no additional comments regarding Option 1.

Option 2: In the absence of preferred locations for gas storage, should there be an additional policy designed to ensure the acceptability of any storage proposals that may come forward and incorporating measures to mitigate the potential environmental impacts of the proposed facility, in terms of both surface and sub surface works?

Respondents either said yes to this option, 43.75%, or did not state a preference for this option, 56.25%. No respondents said no to this option.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	3	4	7	43.75%
No	0	0	0	0.00%
Not specified	0	9	9	56.25%
Total	3	13	16	100.00%

Figure F.72 Issue 21: Option 2

The following comments were made regarding Option 2.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Gas for energy use needs to be reduced and be replaced by renewable sources of heating and energy. This will help to combat the twin issues of climate change and energy security (as most gas is imported).”
- “Policy for the storage of gas for carbon storage should be reviewed regularly as best practice and available technology is rapidly developing.”

Issue 21: Oil and Gas – favoured options

Several respondents selected both options for oil and gas storage. A greater number of respondents, 43.75%, said 'yes' for **Option 2: *In the absence of preferred locations for gas storage, should there be an additional policy designed to ensure the acceptability of any storage proposals that may come forward and incorporating measures to mitigate the potential environmental impacts of the proposed facility, in terms of both surface and sub surface works?*** 31.35% said 'yes' to **Option 1: *Is there a need for policies specifically relating to storage of gas on the basis of local geological circumstances with areas that are potentially suitable for storage, if any, to be identified in the DPD?*** (see Figure F.73).

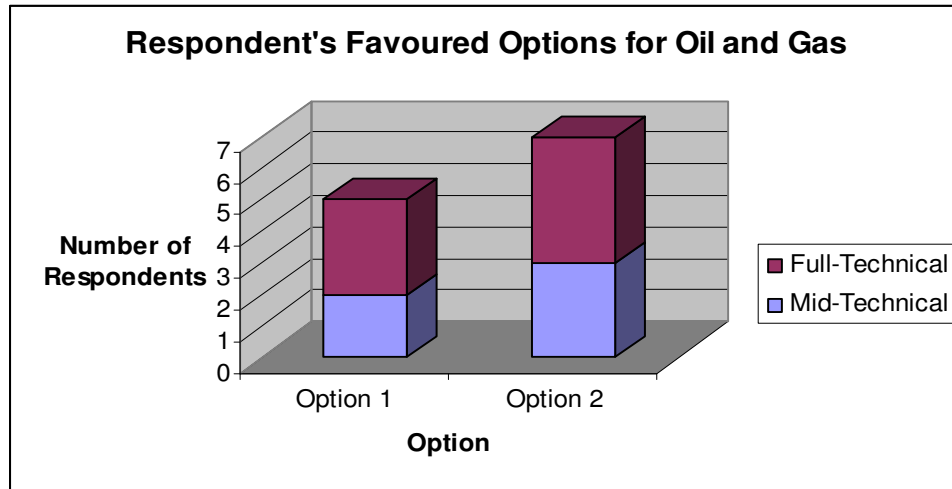


Figure F.73 Respondents' Favoured Options for Oil and Gas

Issue 22: Renewable Energy Technology

Stakeholders were asked which types of renewable energy technologies they consider worthwhile promoting in Leeds for larger scale energy production. Stakeholders were asked to rank the sources they deemed appropriate in order of importance to them, with 1 being the most important and 6 being the least. Scores were inverted to allow for cumulative perceived importance to be graphed.

- Option 1: Wind Turbines**
- Option 2: Solar Power**
- Option 3: Geothermal Technology**
- Option 4: Energy Reclamation from Waste**
- Option 5: Landfill Gas**
- Option 6: Biomass**
- Option 7: Hydropower**

Technical stakeholders made the following comments regarding the use of renewable energy technology.

- “The 'large scale' provided impacts on choices from this list.”
- “There is enormous potential to reclaim energy from waste in Leeds and this is achievable and should plan for the LDF. I am not an expert in Options 1, 2, 3 or 7. Landfill gas can contribute but it is not realistic for large scale energy production. It should not be discounted though for its contribution overall.”

- “Energy from waste incineration should not be classified as a renewable energy as it requires the input of waste which could otherwise be recycled saving large quantities of energy. It should not be counted as an option towards the energy mix for Leeds.”
- “The problem of climate change is so acute that we need to embrace the sources of renewable energy that have a proven track record of delivering energy and that are most suitable for the area. Wind energy can be utilised with great effect in some areas of Leeds. Solar power (both water heating and photovoltaic energy) should be deployed more widely particularly on larger developments. Hydropower can be deployed on the area’s rivers e.g. Wharfe and Aire valleys to provide small scale community schemes.”
- “All are viable in my opinion. Hydropower may be less viable because of the topography and hydrology of Leeds. Micro hydro is still a possibility, particularly on existing weirs and where it can be combined with a fish pass to benefit biodiversity and provide leisure and recreation benefits. Landfill gas use may make landfill more economically viable and undermine diversion of organic (green) and food waste from landfill. EfW may undermine elimination of recyclable waste from the residual stream because the incinerator has a minimum feed requirement in order to operate. If the minimum feed is not met biomass could substitute waste which is no longer entering the residual stream- this is not sustainable and EfW is only 1 step up the waste hierarchy from landfill. I am unsure about the potential for Geothermal but wind, solar and biomass are clearly attractive options and should all be pursued as part of a wider plan to decentralise the energy system, create more (and more efficient) CHP networks and make Leeds self-sufficient in renewable low carbon energy. I cannot rank them without knowing more specific detail on the amount of energy we can produce from each source, what sites are suitable and what the environmental and socio-economic impacts will be of favouring a particular technology. I strongly support the provision of new renewable energy infrastructure.”

Issue 22: Renewable Energy Technology

It is evident that respondents support the use of renewable energy technologies. **Option 2: Solar Power** and **Option 4: Energy Reclamation from Waste** are the favoured options for renewable energy technologies. **Option 1: Wind Turbines** is deemed the least appropriate option of renewable technology (see Figure F.74).

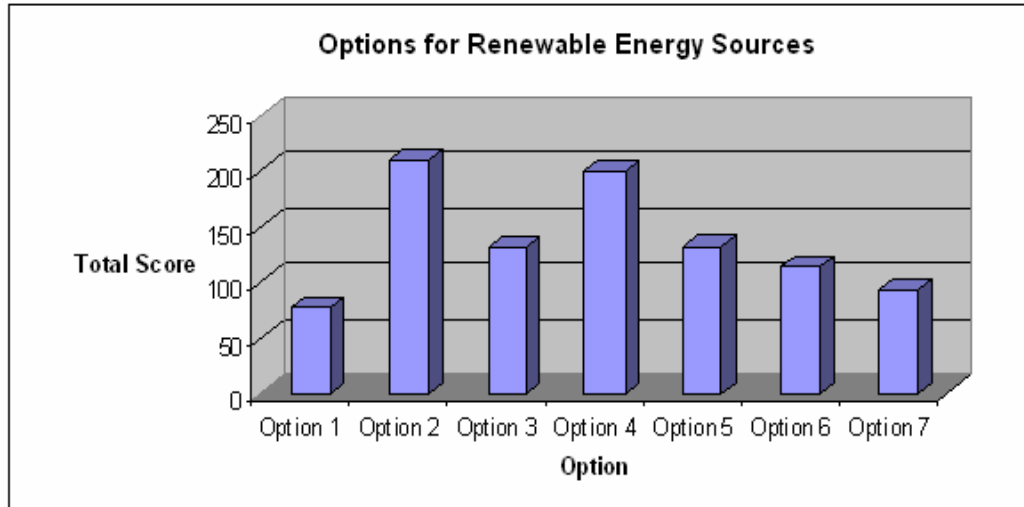


Figure F.74 Options for Renewable Energy Sources

Issue 23: Renewable Energy Technologies

Stakeholders were asked which of the following options is best for the Council to consider regarding the location of renewable energy developments. Below is a summary of responses for each of the options.

Option 1: Research and consultation to be undertaken to provide spatial guidance in the NRWDPD on locations that are suitable for a particular type of renewable energy development

The majority of respondents (56.60%) said ‘yes’ to this option and 9.43% said ‘no’. 33.96% of respondents did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	29	0	1	30	56.60%
No	1	1	3	5	9.43%
Not specified	7	2	9	18	33.96%
Total	37	3	13	53	100.00%

Figure F.75 Issue 23: Option 1

There were no additional comments regarding Option 1.

Option 2: Policies to support renewable developments should be based solely on meeting specified criteria

49.06% said yes to this option and 9.43% said no. 41.51% of respondents did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	26	0	0	26	49.06%
No	0	1	4	5	9.43%
Not specified	11	2	9	22	41.51%
Total	37	3	13	53	100.00%

Figure F.76 Issue 23: Option 2

There were no additional comments regarding Option 2.

Option 3: The NRWDPD should contain a mixture of spatial guidance and criteria based policies

47.17% of respondents said ‘yes’ to this option and 7.55% said ‘no’. 45.28% of respondents did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	16	3	6	25	47.17%
No	4	0	0	4	7.55%
Not specified	17	0	7	24	45.28%
Total	37	3	13	53	100.00%

Figure F.77 Issue 23: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 3 is a balanced approach providing the necessary flexibility.”
- “Option 3 seems preferable. A spatial approach must identify all sites or recognise that some new viable sites will emerge in the future and that the DPD should allow for suitable sites missed out of the original (spatial) mapping exercise to be utilised for RE development. Criteria based policies should not only allow suitable sites to be developed for RE (including those not identified in spatial guidance) but should also oblige developers to utilise RE wherever possible. Just because a site is not identified as suitable in the spatial guidance does not mean it is not suitable for RE development (due to error, uncertainty, technology change, changes in neighbouring land use... etc). Criteria will help ensure suitable sites not identified in the spatial guidance can be developed for RE.”
- “Where a developer has expressed an interest in a particular site and that site has been shown to offer the environmental benefits, then that area should be safeguarded. However, to facilitate further uptake of renewable energy, other

sites which have shown to offer opportunities should also be safeguarded in order to maximise our renewable energy availability. Reference should be made to the sub-regional targets included in RSS for renewable energy generation to ensure that sufficient land is safeguarded to achieve these targets.”

Issue 23: Renewable Energy Technologies – favoured options

Respondents did not agree which option is the best regarding the location of renewable energy developments. Slightly more respondents (56.60%) said ‘yes’ to **Option 1: Research and consultation to be undertaken to provide spatial guidance in the NRWDP on locations that are suitable for a particular type of renewable energy development.** 49.06% said ‘yes’ to **Option 2: Policies to support renewable developments should be based solely on meeting specified criteria** and 47.17% said ‘yes’ to **Option 3: The NRWDP should contain a mixture of spatial guidance and criteria based policies** (see Figure F.78).

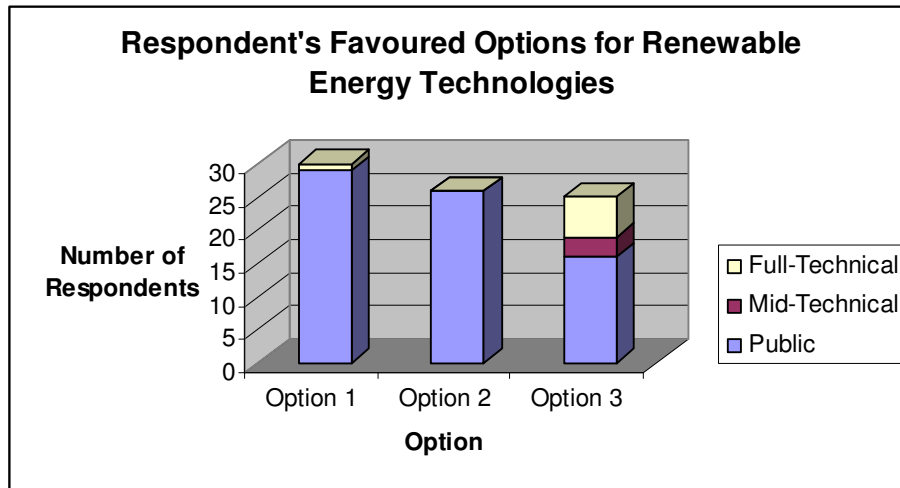


Figure F.78 Respondents' Favoured Options for Renewable Energy Technologies

Issue 24: Mid Scale Generation Renewable Energy

Stakeholders were then asked which of the following options is best for the Council to consider relating to local level thresholds and proportions of local renewable and low carbon energy for supplying new development. Below is a summary of responses for each of the options.

Do you think the NRWDP should provide an overall policy basis for supporting renewable energy development as an integral part of new developments?

Option 1: No Threshold (all development)

The majority of respondents (52.83%) agree that there should be no threshold and 13.21% disagree. 33.96% of respondents did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	23	3	2	28	52.83%
No	4	0	3	7	13.21%
Not specified	10	0	8	18	33.96%
Total	37	3	13	53	100.00%

Figure F.79 Issue 24: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Every development MUST make the most of its renewable energy generating capacity. All new development should utilise renewable energy. Energy efficiency and minimising unnecessary demand and waste is key to protecting our energy resources. Excellent energy efficiency standards should be met on all new developments.”

Option 2: 10 or more dwellings, or 1000m2 of non-residential floorspace (or an area based equivalent) as referred to in the RSS?

Only 16.98% agree with this option and 9.43% disagree. The majority of respondents, 73.58%, did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	6	1	2	9	16.98%
No	2	0	3	5	9.43%
Not specified	29	2	8	39	73.58%
Total	37	3	13	53	100.00%

Figure F.80 Issue 24: Option 2

There were no additional comments regarding Option 2.

Option 3: A higher threshold (please comment)

More respondents disagree than agree with this option (13.21% compared with 11.32%). The majority of respondents (75.47%) did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	4	0	2	6	11.32%
No	3	1	3	7	13.21%
Not specified	30	2	8	40	75.47%
Total	37	3	13	53	100.00%

Figure F.81 Issue 24: Option 3

The following comments were made regarding Option 3.

Public Response

- “All new developments should be carbon neutral/negative.”
- “If this means all development, then yes.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Leeds should conduct research into the best achievable threshold that can be applied in the area which balances the environmental gains with the economic practicalities of achieving this. This research evidence should be the basis for setting the threshold.”

Option 4: Other

83.02% of respondents did not state an alternative to the three options outlined. Only 7.55% said that another option would be appropriate.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	1	1	2	4	7.55%
No	2	1	2	5	9.43%
Not specified	34	1	9	44	83.02%
Total	37	3	13	53	100.00%

Figure F.82 Issue 24: Option 4

The following comments were made regarding Option 4.

Public Response

Full-Technical respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Provisions should be made according to size of development in line with an overall policy and in the DPD.”

Issue 24: Mid Scale Generation Renewable Energy – favoured option

The findings indicate that **Option 1: No Threshold (all development)** is the preferred option for a policy in the NRWDPD which supports renewable energy development as an integral part of new developments. 52.83% said ‘yes’ to this option (see Figure F.83).

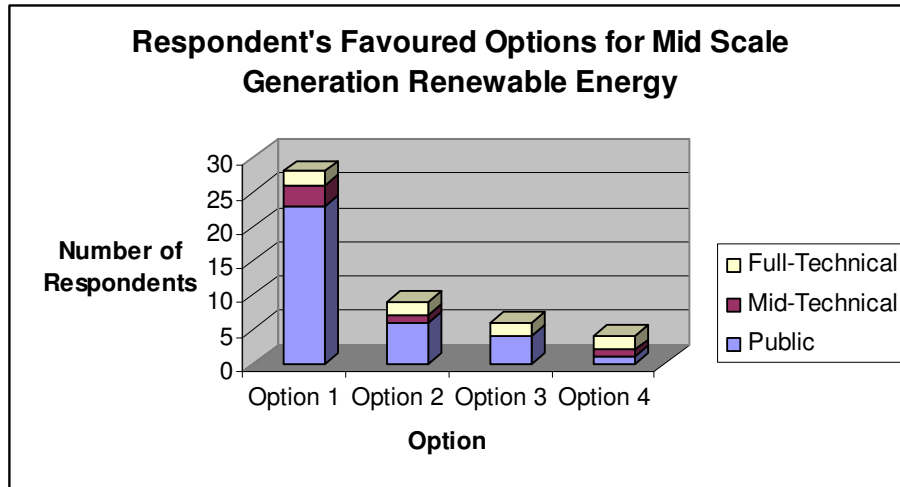


Figure F.83 Respondents' Favoured Options for Mid Scale Generation Renewable Energy

Issue 25: Renewable Energy Technologies- partnering with other agencies

Stakeholders were asked:

In the event that Leeds is unable to produce significant levels of energy from renewable technologies within the Authority Area would you be supportive of the Council collaborating with other agencies to provide more renewable energy sites in appropriate locations (this may require incentives to partner authorities whose local characteristics mean that there is more potential to meet energy demands from renewable technologies)?

73.58% of respondents said they would be supportive of the Council collaborating with other agencies to provide more renewable energy sites in appropriate locations, no respondents disagree and the remaining 26.42% didn't specify a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	30	3	6	39	73.58%
No	0	0	0	0	0.00%
Not specified	7	0	7	14	26.42%
Total	37	3	13	53	100.00%

Figure F.85 Issue 25

The following justifications were given.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

- “Passive solar energy gain i.e. south facing buildings. Ongoing use needs less user input.”

Full-Technical Response

- “Provided that, in the case of wind energy, the focus was to the East of Leeds rather than the West, where the Pennine landscapes are more sensitive to the intrusion of wind turbines.”
- “See no harm in pursuing regional technology opportunities for Leeds if the infrastructure may be based outside Leeds. Leeds should utilise renewable energy opportunities wherever they present themselves and should partner with other agencies and authorities if conducive to securing more renewable energy.”
- “This question needs re-wording: in the event that Leeds FAILS to produce.... Also define significant in terms of X% of total energy demand of the city.”

Issue 25: Renewable Energy Technologies- partnering with other agencies – favoured option
The majority of respondents said 'yes', they would be supportive of: **the Council collaborating with other agencies to provide more renewable energy sites in appropriate locations** (see Figure F.85).

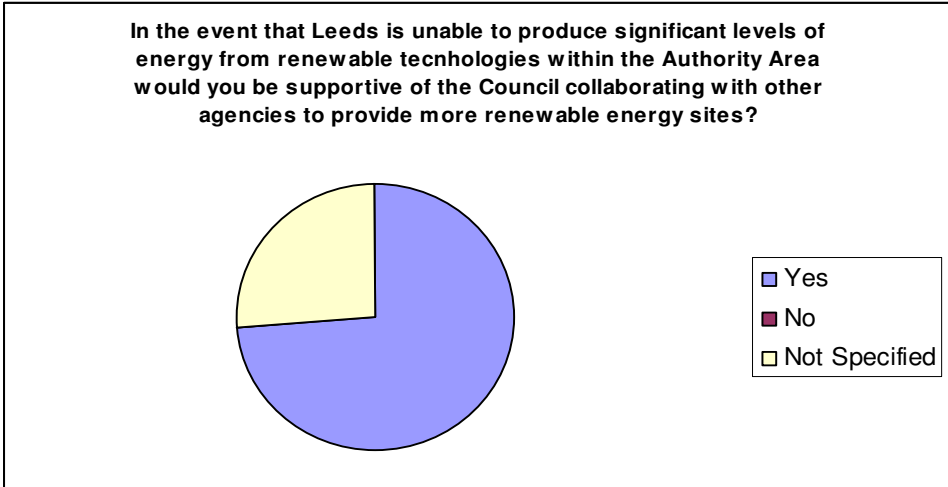


Figure F.85 Respondents' who favoured partnering with other agencies in Renewable Energy Technologies

Issue 26, 27, and 28: Micro-generation

Stakeholders were asked which of the following options is best for the Council to consider regarding policies micro-generated renewable technologies. Below is a summary of responses for each of the options.

Leeds City Council can formulate policies that both promote the use of micro-generated renewable technologies and require new developments to incorporate these technologies wherever possible. Do you:

Option 1: Agree with this approach and think this should be considered as a policy for all types of development in the NRWDPD?

The majority of respondents (54.72%) agree with the approach and 9.43% disagree. 35.38% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	23	2	4	29	54.72%
No	2	0	3	5	9.43%
Not specified	12	1	6	19	35.85%
Total	37	3	13	53	100.00%

Figure F.86 Issue 26: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

“Furthermore, microgeneration should be required for developments above a certain size. This should apply across all types of development and inclusion in the NRWDPD will ensure an integrated approach to this aim.”

Option 2: Agree with this approach but think that the other DPDs to be prepared should each consider this issue separately in relation to the different types of development (e.g. housing, employment, retail) as there may be alternative solutions?

35.85% agree with the approach, but think that other DPDs to be prepares should also consider this and 9.43% disagree with this option. 54.72% did not state a preference for this option.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	13	2	4	19	35.85%
No	3	0	2	5	9.43%
Not specified	21	1	7	29	54.72%
Total	37	3	13	53	100.00%

Figure F.87 Issue 26: Option 2

The following comments were made regarding Option 2.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Unless I misunderstand- the two are not mutually exclusive. The NRWDPD should require new developments to incorporate microgeneration and other DPDs should also require new developments to incorporate microgeneration. If different technologies are more appropriate to different types of development this can be highlighted in the DPDs.”

Option 3: Disagree with this approach and think that policies on micro-renewables should not be included? (The full-technical questionnaire did not give this option.)

Only 2.50% of respondents said they disagree with the suggested approach, whilst 15.00% of respondents agree with the approach. 82.50% of respondents did not specify a preference for this option.

Response	Frequency			Percentage
	Public	Mid-Technical	Total	
Yes	1	0	1	2.50%
No	4	2	6	15.00%
Not specified	32	1	33	82.50%
Total	37	3	40	100.00%

Figure F.88 Issue 26: Option 3

There were no comments regarding Option 3.

Stakeholders were also asked:

Do you have any suggestions for other micro renewable technologies that could be used in Leeds other than those referred to in the previous issue?

No other micro renewable technologies were suggested by respondents. The following responses were given.

Public Response

- “Be strict with developers. Provide grants for personal installation. Use extensively for council owned property.”
- “I think that policies should be going with lobbied so that financial incentives should faster technological development (as in other European countries).”
- “Burn domestic waste.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “The list in Issue 26 seems to be wide ranging. Leeds City Council should deploy resources to keep abreast of developments in technology and to ensure that these developments are incorporated into policy delivery.”

Stakeholders were the asked the question:

As part of measures to streamline the current planning system, the Government is considering proposals to encourage more micro-renewable technology development in households and commercial uses by amending regulations that cover permitted development rights so that fewer of these types of developments will require planning permission. As part of this NRWDPD preparation consultation process the Council can write to Government to offer support for this proposal, and if necessary incorporate such support into text of the DPD. Do you agree with this approach?

The majority of respondents (69.81%) agree with this approach and 9.43% disagree. 20.75% did not specify a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	30	3	4	37	69.81%
No	3	0	2	5	9.43%
Not specified	4	0	7	11	20.75%
Total	37	3	13	53	100.00%

Figure F.89 Issue 28

The following justifications were given.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “No. I would support any sustainable renewable technologies but I am not aware of any others.
- “New development alongside the waterway should consider using the water for cooling of building and heating systems. British Waterways can advise on these schemes. Use of small hydro schemes on weirs and locks. Again, consult British Waterways.”

Issue 26, 27, and 28: Micro-generation – favoured options

The majority of respondents (54.72%) agree with **Option 1: the Council should formulate policies that both promote the use of micro-generated renewable technologies for all types of development in the NRWDPD** (see Figure F.90).

When asked: **Do you have any suggestions for other micro renewable technologies that could be used?** No other micro renewable technologies were suggested by respondents.

The majority of respondents, 69.81%, agree that the council should write to Government to offer support for the proposal that amends regulations that cover permitted development rights so that fewer microgeneration developments will require planning permission (see Figure F.91).

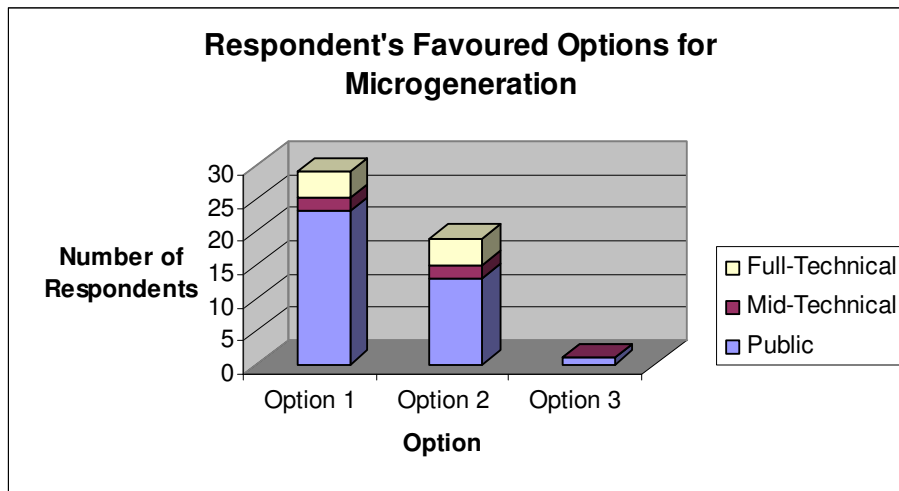


Figure F.90 Respondents' Favoured Options for Microgeneration

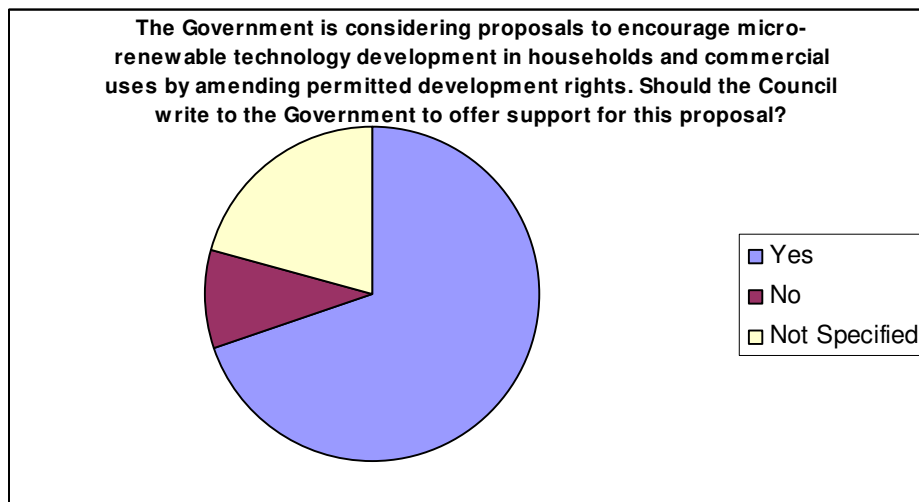


Figure F.91 Respondents' who favoured writing to the Government to support Microgeneration Developments

Issue 29, 30: Micro Hydro Generation

Stakeholders were asked which of the following options is best for the Council to consider relating to the potential of micro hydro generation. Below is a summary of responses for each of the options.

The potential for micro hydro generation within the Leeds area needs to be investigated further.

Option 1: *The Council should do nothing on this issue as it is likely to be of limited significance*

Only 9.43% of respondents agree with this option, whilst 20.75% disagree. The remaining 69.81% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	5	0	0	5	9.43%
No	4	2	5	11	20.75%
Not specified	28	1	8	37	69.81%
Total	37	3	13	53	100.00%

Figure F.92 Issue 29: Option 1

There were no additional comments regarding Option 1.

Option 2: *The council should appraise the potential for micro hydro power further for this NRWDPD*

The majority of respondents, 56.60%, agree with this option and only 3.77% disagree. The remaining 39.62% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	23	2	5	30	56.60%
No	1	0	1	2	3.77%
Not specified	13	1	7	21	39.62%
Total	37	3	13	53	100.00%

Figure F.93 Issue 29: Option 2

The following comments were made regarding Option 2.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “The river valleys around Leeds are prime sites for the development of small scale hydro-power and the DPD should ensure that these opportunities are capitalized upon.”
- “Options 2 and 3 should be considered. I do not know how many GWH/ MWH of electric we would get from developing sustainable micro hydro power but I think it needs to be explored. There must be scope for fitting micro hydro power to existing weirs, locks and dams and these should be combined with a fish pass to allow salmon and other fish to migrate and move along the aquatic habitats of Leeds. Biodiversity and fish are important natural resources.”

Option 3: The Council should appraise the potential for micro hydro power further, but it would be more appropriate for different DPDs e.g. on Housing?

Only slightly more respondents agree than disagree with this option (18.87% compared with 13.21%). The majority of respondents (67.92%) did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	5	3	2	10	18.87%
No	4	0	3	7	13.21%
Not specified	28	0	8	36	67.92%
Total	37	3	13	53	100.00%

Figure F.94 Issue 29: Option 3

There were no additional comments regarding Option 3.

Stakeholders were then asked:

There is the opportunity for adjacent developments to improve their energy resource efficiency by working together; for example institutions obtaining waste water heat from nearby business. Do you think that this is something that should be investigated further in this DPD, with policies promoted?

77.36% of respondents agree that adjacent developments should work together to improve their energy resource efficiency and this should be investigated further in this DPD. Only 3.77% disagree and the remaining 18.87% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	32	3	6	41	77.36%
No	2	0	0	2	3.77%
Not specified	3	0	7	10	18.87%
Total	37	3	13	53	100.00%

Figure F.95 Issue 30

The following justifications were given.

Public Response

- “Yes, provided this does not include energy from waste incineration.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “We must use resources efficiently. I strongly support this proposal. CHP is one way this will work. Waste management also has the potential for increased efficiency by adjacent developments working together and also separate developments that share a common waste resource (e.g. Company X produces waste cardboard, company Y can take that waste cardboard by canal to company Z who recycles it and recovers value.)”

Issue 29, 30: Micro Hydro Generation – favoured options

The majority of respondents (56.60%) agree with **Option 2: The council should appraise the potential for micro hydro power further for this NRWDPD** (see Figure F.96). 77.36% of respondents also supported the **opportunity for adjacent developments working to together to improve their energy resource efficiency**; and felt that it is **something that should be investigated further in this DPD** (see Figure F.97).

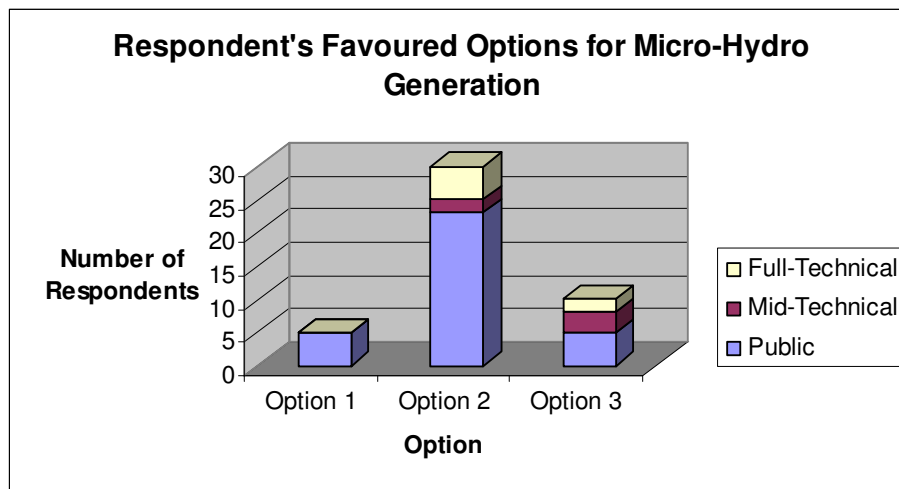


Figure F.96 Respondents' Favoured Options for Micro Hydro Generation

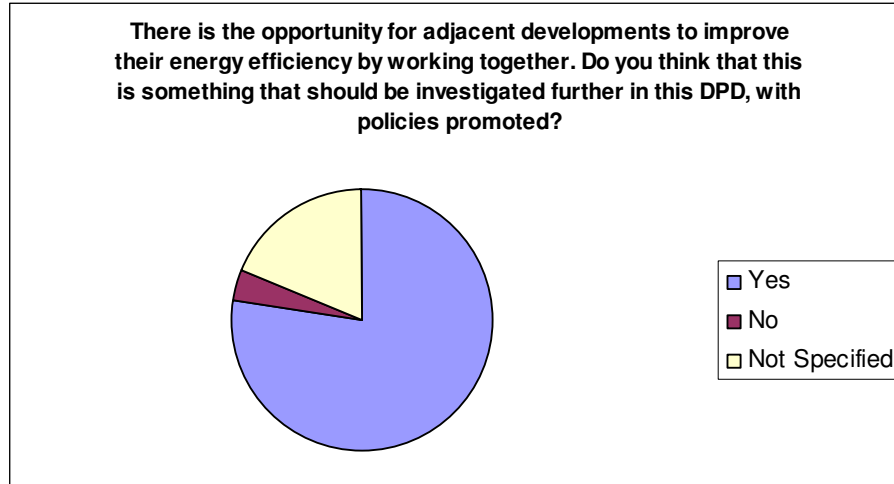


Figure F.97 Respondents' who favoured adjacent developments working together to improve their resource efficiency

Water Resources

The following section presents data from the Water Resources section of the questionnaire.

Issue 32: Water Quality

Stakeholders were asked which one of the following options would be most appropriate to improving the local water quality (and preventing adverse impacts) where brownfield site development is close to water resources. Below is a summary of responses for each of the options.

Option 1: Define sensitive areas where development will not be allowed adjacent to water resources

43.40% of respondents agree with this option and 13.21% disagree. The remaining 43.40% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	21	0	2	23	43.40%
No	2	2	3	7	13.21%
Not specified	14	1	8	23	43.40%
Total	37	3	13	53	100.00%

Figure F.98 Issue 32: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

“My personal view is that all waterside development (except infrastructure that NEEDS to be directly adjacent to a waterway e.g. boating infrastructure, canal freight infrastructure) should include a buffer zone because the waterways should provide green infrastructure in the form of wildlife corridors and linear parks with walking and cycling infrastructure, native and edible plants and good biodiversity.”

Option 2: Provide criteria stating that development must demonstrate that there will be no impact on water quality

The majority of respondents (52.83%) agree with this option and 7.55% disagree. The remaining 39.62% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	22	2	4	28	52.83%
No	2	1	1	4	7.55%
Not specified	13	0	8	21	39.62%
Total	37	3	13	53	100.00%

Figure F.99 Issue 32: Option 2

The following comments were made regarding Option 2.

Public Response

- “Is this not already government policy?”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

Option 3: Provide criteria stating that development must improve the water quality of any adjacent water resources, which are of poor quality (The full-technical questionnaire did not give this option.)

The majority of respondents (55.00%) agree with this option and 10.00% disagree. The remaining 35.00% did not state a preference.

Response	Frequency			Percentage
	Public	Mid-Technical	Total	
Yes	22	0	22	55.00%
No	2	2	4	10.00%
Not specified	13	1	14	35.00%
Total	37	3	40	100.00%

Figure F.100 Issue 32: Option 3

There were no additional comments regarding Option 3.

Issue 32: Water Quality – favoured options

Respondents did not agree which of the options would be the most appropriate to improve the local water quality (and prevent adverse impacts) where brownfield site development is close to water resources. Several respondents selected all three options. 55% agree with **Option 3: Provide criteria stating that development must improve the water quality of any adjacent water resources, which are of poor quality** (The full-technical questionnaire did not give this option); 52.83% agree with **Option 2: Provide criteria stating that development must demonstrate that there will be no impact on water quality**; and 43.30% agree with **Option 1: Define sensitive areas where development will not be allowed adjacent to water resources** (see Figure F101).

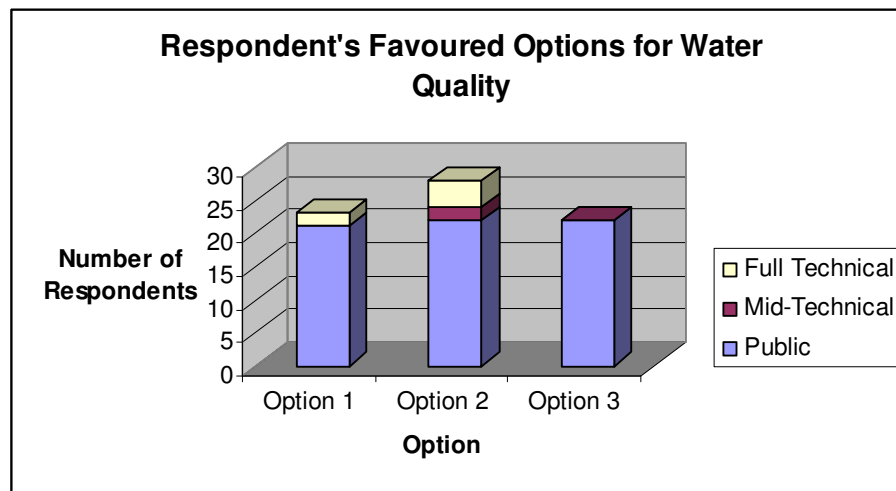


Figure F.101 Respondents' Favoured Options for Water Quality

Issue 33: Drainage

Stakeholders were asked which of the following options is best for the Council to consider regarding permitted development using impermeable surfaces. Below is a summary of responses for each of the options.

Option 1: Remove permitted development rights across the Leeds City area for development using impermeable surfaces

49.06% of respondents agree with this option and 16.98% disagree. The remaining 33.96% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	22	0	4	26	49.06%
No	2	2	5	9	16.98%
Not specified	13	1	4	18	33.96%
Total	37	3	13	53	100.00%

Figure F.102 Issue 33: Option 1

The following additional comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 1. Yes. People need to be prevented from paving their gardens- its bad for floods and urban heat island effect. It is disastrous for urban wildlife. Porous paving is better than impermeable paving but it is still bad. Have a policy to encourage the retention of existing soil and biodiversity resources by heavily restricting new paving. Answer = Rainwater collection and storage (and utilisation). SUDS (linked to wildlife habitat, rainwater harvesting etc). Functional floodplains (not necessarily have to be linked to rivers). Greener infrastructure. More vegetation (esp. native species). Remove (as well as prevent new) impermeable surfaces. Green roofs. Increase the amount of organic matter in the soil.”

Option 2: Identify the areas of drainage stress and remove permitted development rights for development using impermeable surfaces within these areas only?

33.96% of respondents agree with this option and 26.42% disagree. The remaining 33.62% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	14	2	2	18	33.96%
No	7	1	6	14	26.42%
Not specified	16	0	5	21	39.62%
Total	37	3	13	53	100.00%

Figure F.103 Issue 33: Option 2

There were no additional comments regarding Option 2.

Stakeholders were then asked the question

Are there alternative ways of reducing the stress upon areas of existing inadequate drainage capacity?

Stakeholders suggested the following as alternatives to the two options set out in the question.

Public Response

- “Flood retention measures such as the creation of underground (as in Bradford) and over ground reservoirs.”
- “Good maintenance of gutters, grates & drains and the clearing of blockages”
- “Use separate pipes for rain water and waste water”

- “Keep the street drains clean - mine have not been touched for many many years and are all 'bunded' up; surface water just flows by the drains. Also dredge streams and rivers regularly”
- “Update & expand mains drainage facility - ensure drains are maintained clean and emptying gully traps etc”
- “Incentives to reduce water usage e.g. water meters”
- “All development of brownfield sites with stress capacity to be surrounded by open natural landscaping”
- “Make people have gravel driveways instead of concrete”
- “If you have to build - use green roofs etc to absorb water and big rainwater tanks on all properties”
- “Improve drains so that they can cope with increased demand caused by climate change and historical growth. Stronger programme of cleaning & maintaining drains to prevent multiplication of problems.”
- “Tree planting, especially Willows. Future tree planting should be fruit / nut trees to alleviate food shortages due to global warming.”
- “The planting and green roofs.”
- “Maintenance of drainage systems.”
- “Help restore gardens with grass.”

Mid-Technical Response

- “Major campaign to install rainwater capture on a larger scale for reuse (water demand gain) but recognise this will not ease problem of prolonged heavy rain.”

Full-Technical Response

- “1) Use SUDS (Sustainable Urban Drainage Systems) to manage flows at source or to attenuate run-off rates and volumes; 2) Require developers to contribute to augmentation of downstream drainage capacity; 3) Require safe pathways for flows exceeding drainage capacity to be built into the layout of new developments.”
- “An inadequacy in the drainage system in any area affects the flooding in specific parts of the city. Therefore, a blanket approach must be taken to prevent these impacts affecting vulnerable communities.”
- “In conjunction with the water supplier consider introducing metering comprehensively in areas of stress. Investigate incentives (e.g. rebates) for landowners to minimise proportions of their sites that have impervious surfaces or in the case of roofs are capable of harvesting rainwater.”

Issue 33: Drainage – favoured options

Findings indicate that there is not a significant difference in response to the two options. Slightly more, 49.06% compared with 33.95%, favour **Option 1: Remove permitted development rights across the Leeds City area for development using impermeable surfaces** over **Option 2: Identify the areas of drainage stress and remove permitted development rights for development using impermeable surfaces within these areas only** (see Figure F.104).

When asked, **Are there alternative ways of reducing the stress upon areas of existing inadequate drainage capacity**, respondents gave the following responses:

- The use of SUDs.
- Introduction of water metering comprehensively in areas of stress.
- Update and expand drainage.
- Maintenance of gutters, grates & drains and the clearing of blockages.
- Install rainwater capture on a larger scale for reuse.
- Tree planting.
- Green roofs.

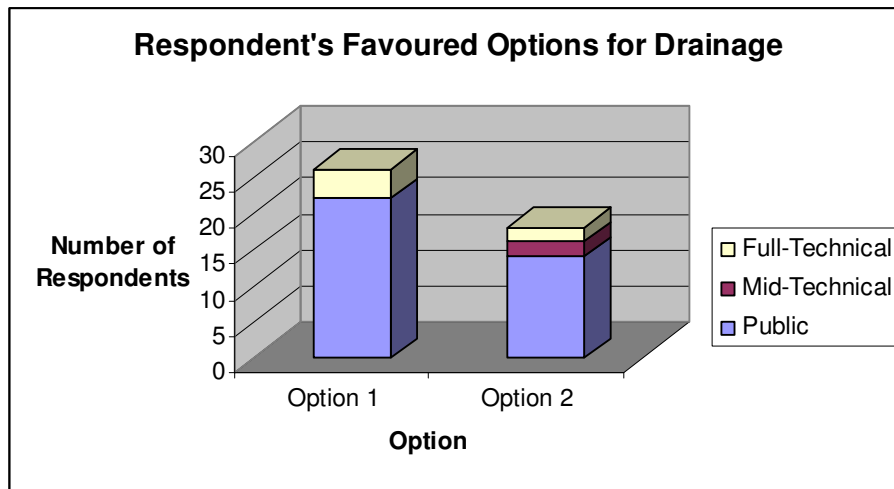


Figure F.104 Respondents' Favoured Options for Drainage

Issue 34: Water Efficiency

Stakeholders were asked which of the following options is best for the Council to consider regarding water efficient developments. Below is a summary of responses for each of the options.

Option 1: Yes, I think that the NRWDPD should promote water efficient developments

The majority of respondents, 83.02% agree with this option and only 1.89% disagree. The remaining 15.09% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	34	3	7	44	83.02%
No	1	0	0	1	1.89%
Not specified	2	0	6	8	15.09%
Total	37	3	13	53	100.00%

Figure F.105 Issue 34: Option 1

There were no additional comments regarding Option 1.

Option 2: No, I do not think that water efficient developments are an issue.

The majority of respondents (79.25%) disagree with this option and only 1.89% agree. The remaining 18.87% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	1	0	0	1	1.89%
No	34	2	6	42	79.25%
Not specified	2	1	7	10	18.87%
Total	37	3	13	53	100.00%

Figure F.106 Issue 34: Option 2

There were no additional comments regarding Option 2.

Stakeholders were then asked the question

Are there alternative ways of improving water efficiency in new developments that you think should be included?

Stakeholders suggested the following as alternatives to the two options set out in the question:

Public Response

- “Yes, rain water used to flush toilets.”
- “Use of rainwater for toilets- semi permeable driveways.”
- “Fit shower/wet rooms instead of baths. Provide water butts to collect rain water via fall pipes from roof (for garden use). Fit small flush/normal flush toilets.”
- “Ensure that run-off goes to recycling and not into rivers.”
- “Not directly but surely we can look at countries such as Australia, where water efficiency is paramount.”
- “Offer financial incentives for water meters and usage reductions.”

Mid-Technical Response

- “Large roof industrial to look at 'exporting' rainwater to neighbours if they have low water needs.”

Full-Technical Response

- “Reduce demand for water. ‘Hippos’ in toilets. Water-air mixers in taps.”
- “The extraction, cleansing and distribution of water consume energy and, therefore, produce emissions. In a robust climate policy, we need to minimize waste of energy wherever possible and this includes waste from inefficient use of water. This policy should include the requirement, where practical, of rainwater collection and grey-water systems.”

Issue 34: Water Efficiency – favoured options

Findings indicate that **Option 1: Yes, I think that the NRWDPD should promote water efficient developments** is the favoured approach; 83.02% agree with this option (see Figure F.107).

When asked, **Are there alternative ways of improving water efficiency in new developments that you think should be included**, respondents suggested the use of sanitary applications and low water use fittings such as water-air mixers in taps.

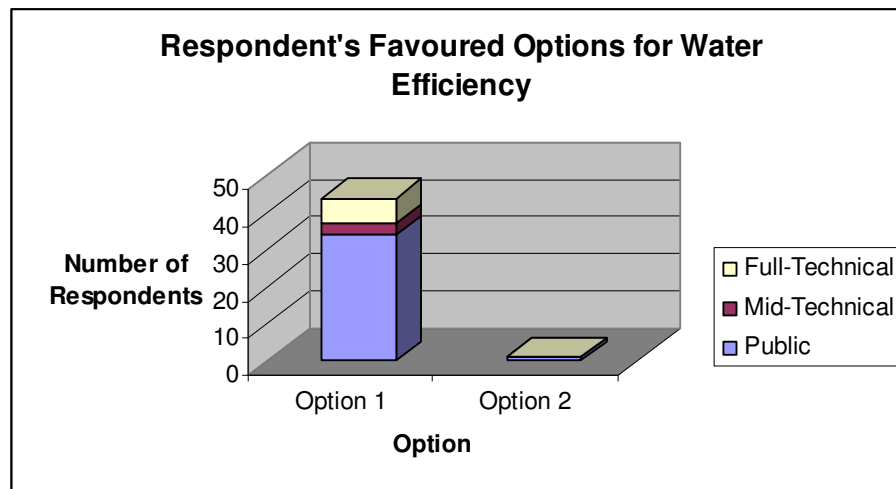


Figure F.107 Respondents' Favoured Options for Water Efficiency

Issue 35: Water Resources

Stakeholders were asked which of the following options is best for the Council when considering the possibility of a criteria based policy approach for water resources in new development requiring information to be supplied against which this principle would be assessed. Below is a summary of responses for each of the options.

Option 1: This would be appropriate for all new development

The majority of respondents (75.58%) agree with this option and only 1.89% disagrees. The remaining 24.53% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	30	3	6	39	73.58%
No	0	0	1	1	1.89%
Not specified	7	0	6	13	24.53%
Total	37	3	13	53	100.00%

Figure F.108 Issue 35: Option 1

The following comments were made regarding Option 1.

Public Response

- “Locations for the movement of waste minerals by water should be identified. Particularly for waterside developments where planning conditions should stipulate movement by water of minerals.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Whereas it is clear that major gains can be made from applying this policy to major developments, to maximize the benefit it would need to be applied to all developments.”

Option 2: This would be appropriate for major development, e.g. large scale commercial uses and residential developments

26.42% of respondents agree with this option and 11.32% disagree. The remaining 62.26% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	9	1	4	14	26.42%
No	4	1	1	6	11.32%
Not specified	24	1	8	33	62.26%
Total	37	3	13	53	100.00%

Figure F.109 Issue 35: Option 2

There were no additional comments regarding Option 2.

Option 3: This is not appropriate

1.89% of respondents agree with this option and 20.75% disagree. The remaining 77.36% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	1	0	0	1	1.89%
No	5	2	4	11	20.75%
Not specified	31	1	9	41	77.36%
Total	37	3	13	53	100.00%

Figure F.110 Issue 35: Option 3

There were no additional comments regarding Option 3.

Issue 35: Water Resources – favoured options

Findings indicate that when considering the possibility of criteria based policy approach for water resources respondents favour **Option 1: This would be appropriate for all new development**. 73.58% of respondents agree with this option (see Figure F.111).

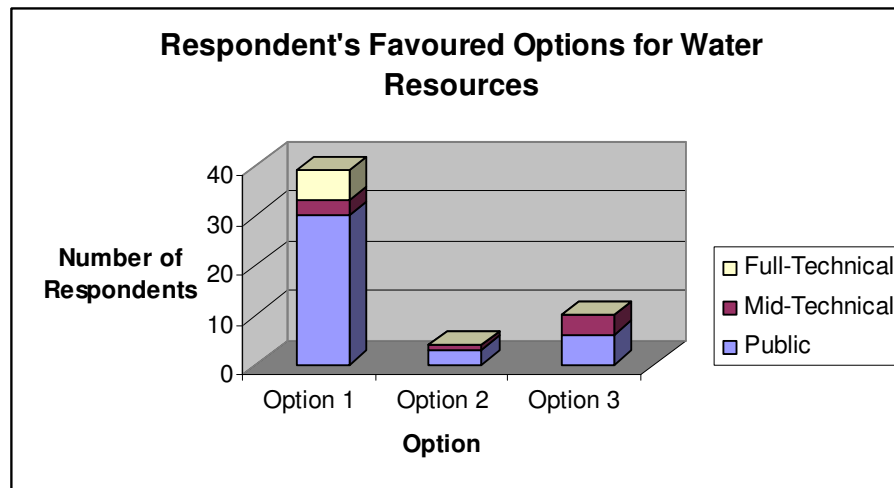


Figure F.111 Respondents' Favoured Options for Water Resources

Air Quality

The following section presents data from the Air Quality section of the questionnaire

Issue 36: Air Quality - Improvement

Stakeholders were asked:

Do you agree that the primary cause of air pollution and reduction in quality is a result of transport emissions?

49.06% of respondents agree that air pollution is the mainly a result of transport emissions and 24.53% disagree. The remaining 26.42% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	22	1	3	26	49.06%
No	10	1	2	13	24.53%
Not specified	5	1	8	14	26.42%
Total	37	3	13	53	100.00%

Figure F.112 Issue 36

The 24.53% of respondents who disagree gave the following sources as the main cause of air pollution in Leeds:

Public Response

- “The situation is more complex, local point sources are very significant in certain locations these need to be tackled as well, also it is the mixing of pollutants which has been very significant. Construction is a major factor in central Leeds”
- “Power generation using fossil fuels”
- “Heating, including BBQ”
- “I think cars, industry and domestic sources all play an equal part in our air pollution”
- “Planes also are a major contributor”
- “Combination of industrial pollutants, fires, bio decomposition”
- “Pollution from landfill sites, power stations as well as public transport”
- “Not known - requires a technical investigation to determine sources”
- “A mixture of everything, for instance the policy of making Leeds a 24 hour city must have massively increased uses of fossil fuels for heating lighting & loud music!”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Transport does comprise the majority of air quality problems and this is particularly the case in significant arterial routes around the city, such as in AQMA’s.”

The 49.06% of respondents who agree that transport emissions were the main cause of air pollution were asked which if the following options were preferable in improving air quality in Leeds without restricting development and ensuring effective transportation is maintained. Below is a summary of responses for each of the options.

Option 1: The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed within the Transport DPD

37.74% of respondents agree with this option and 11.32% disagree. The remaining 50.94% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	17	1	2	20	37.74%
No	2	1	3	6	11.32%
Not specified	18	1	8	27	50.94%
Total	37	3	13	53	100.00%

Figure F.113 Issue 36: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

“However, since it is not the only cause of air quality problems the NRWDPD should contain a policy on improving air quality. Hence, Option 1 should apply.”

Option 2: Issues of air quality improvement should be solely addressed in the Transport DPD

26.42% of respondents disagree with this option and only 5.66% agree. The remaining 67.92% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	2	1	0	3	5.66%
No	8	1	5	14	26.42%
Not specified	27	1	8	36	67.92%
Total	37	3	13	53	100.00%

Figure F.114 Issue 36: Option 2

There were no additional comments regarding Option 2.

Option 3: Issues of air quality improvement should be addressed in other DPDs on Transport, Housing, and Employment and Retail (given that air pollution is also caused by carbon emissions from development)

The majority of respondents (50.94%) agree with this option and only 3.77% agree. The remaining 45.28% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	20	2	5	27	50.94%
No	1	0	1	2	3.77%
Not specified	16	1	7	24	45.28%
Total	37	3	13	53	100.00%

Figure F.115 Issue 36: Option 3

The following comments were made regarding Option 3.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed within the DPDs on transport, housing, employment and retail and any other relevant DPDs and AAPs.”

Issue 36: Air Quality Improvement – favoured options

Findings indicate respondents favour **Option 3: Issues of air quality improvement should be addressed in other DPDs on Transport, Housing, and Employment and Retail (given that air pollution is also caused by carbon emissions from development)**, 50.94% of respondents agree with this option. **Option 1: The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed within the Transport DPD** was favoured by 37.74% of respondents (see Figure F.116).

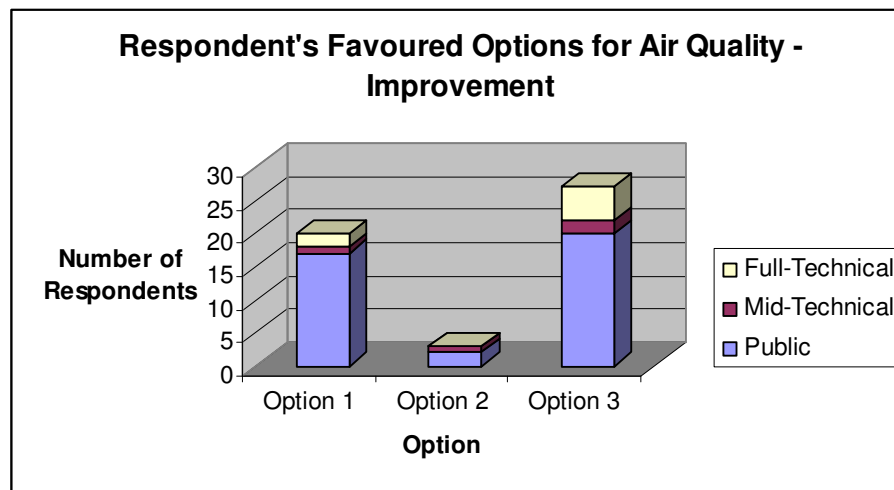


Figure F.116 Respondents' Favoured Options for Air Quality – Improvement

Issue 37: Air Quality – Air Pollution from Industrial Premises

Stakeholders were asked which of the following options is best for the Council to consider with regards to air quality emitted from industrial premises and how this may affect local residents in defined residential areas. Below is a summary of responses for each of the options. **In defined residential areas, should the DPD:**

Option 1: Make a presumption against new industrial developments that produce emissions to air

50.94% of respondents agree with this option and 9.43% disagree. The remaining 39.62% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	22	2	3	27	50.94%
No	2	1	2	5	9.43%
Not specified	13	0	8	21	39.62%
Total	37	3	13	53	100.00%

Figure F.117 Issue 37: Option 1

The following comments were made regarding Option 1.

Public Response

Public respondents had no additional comments on this issue.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Option 1 – there should be a presumption against polluting development.”

Option 2: Allow new industrial developments, if they utilise the strictest emission technologies on the market in line with BAT (even if this is beyond the standards of the Environment Agency Pollution Control Guidelines)

37.74% of respondents agree with this option and 11.32% disagree. The remaining 50.94% did not state a preference.

Response	Frequency				Percentage
	Public	Mid-Technical	Full-Technical	Total	
Yes	14	1	5	20	37.74%
No	2	1	3	6	11.32%
Not specified	21	1	5	27	50.94%
Total	37	3	13	53	100.00%

Figure F.118 Issue 37: Option 2

The following comments were made regarding Option 2.

Public Response

- “Air quality should be a city wide issue and not confined to AQMAS.”

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

Full-Technical respondents had no additional comments on this issue.

In addition [to Options 1 and 2], should the Council...

Option 3: Encourage the retrofitting of existing industrial premises to meet BAT for emissions (and if necessary negotiate with the Environment Agency and / or local environmental health bodies to seek improved standards of pollution control in existing industrial developments (The public questionnaire did not give this option)

37.50% of respondents agree with this option and 12.50% disagree. The remaining 50.00% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	5	6	37.50%
No	1	1	2	12.50%
Not specified	1	7	8	50.00%
Total	3	13	16	100.00%

Figure F.119 Issue 37: Option 3

The following comments were made regarding Option 3.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “It is against the National Guidance of PPS10 to duplicate the controls of the Environmental Agency let alone exceed their requirements to do so would inevitably lead to appeals clogging up the planning system at great cost to the taxpayers of Leeds.”
- “Option 3 – retrofitting of technology should be required”
- “Option 1 would be nice as it will protect air quality from new sources of pollution but I see that a combination of Option 2 and 3 would allow retrofitting and could therefore achieve a better overall improvement in air quality.”

Issue 37: Air Quality – Air Pollution from Industrial Premises – favoured options

Findings indicate respondents favour **Option 1: In defined residential areas the DPD should make a presumption against new industrial developments that produce emissions to air.** 50.94% of respondents agree with this option. A relatively large percentage, 37.74%, also agreed with **Option 2: Allow new industrial developments, if they utilise the strictest emission technologies on the market in line with BAT (even if this is beyond the standards of the Environment Agency Pollution Control Guidelines)** (see Figure F.120).

More agreed than disagreed, 37.50% compared with 12.50%, with the additional Option - **Option 3: Encourage the retrofitting of existing industrial premises to meet BAT for emissions (and if necessary negotiate with the Environment Agency and / or local environmental health bodies to seek improved standards of pollution control in existing industrial developments.**

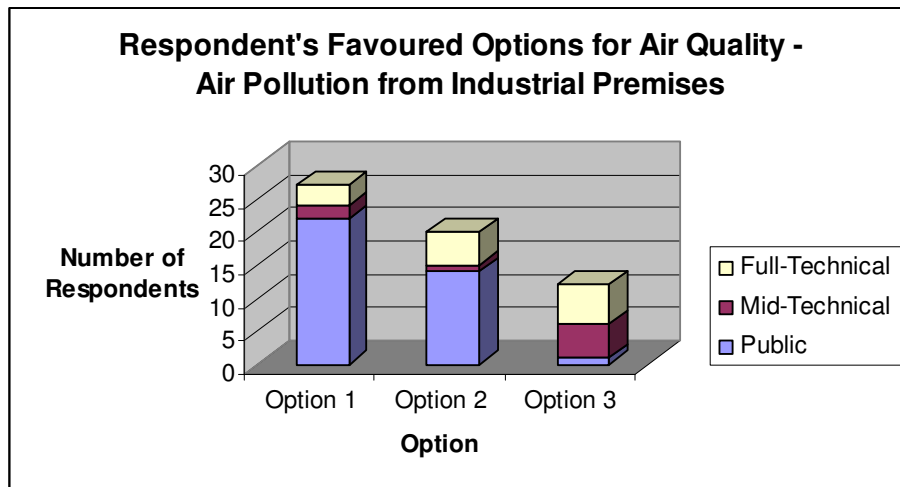


Figure F.120 Respondents' Favoured Options for Air Quality – Air Pollution from Industrial Premises

Issue 38: Air Quality – Policy Application

Technical stakeholders were asked which of the following options is best for the Council to consider with regards to the locations which a policy for air quality should apply. Below is a summary of responses for each of the options.

Would it be appropriate to have a policy that requires development to address and mitigate against air quality impacts in the following locations:

Option 1: Only identified AQMAs (both current and future)

37.50% of respondents disagree with this option and 12.50% agree. The remaining 50.00% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	0	2	2	12.50%
No	2	4	6	37.50%
Not specified	1	7	8	50.00%
Total	3	13	16	100.00%

Figure F.121 Issue 38: Option 1

There were no comments regarding Option 1.

Option 2: Identified AQMAS and an appropriate buffer zone around its perimeter. If you think Option 2 is appropriate what width buffer zone would you suggest?

37.50% of respondents disagree with this option and only 6.25% agree. The remaining 56.25% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	0	1	6.25%
No	1	5	6	37.50%
Not specified	1	8	9	56.25%
Total	3	13	16	100.00%

Figure F.122 Issue 38: Option 2

There were no additional comments regarding Option 2.

Option 3: Throughout the whole of the City Council area?

43.75% of respondents agree with this option and only 6.25% disagree. The remaining 50.00% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	3	4	7	43.75%
No	0	1	1	6.25%
Not specified	0	8	8	50.00%
Total	3	13	16	100.00%

Figure F.123 Issue 38: Option 3

The following comments were made regarding Option 3.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “There is a cumulative effect of air pollution on health which means that any gain on improving air quality has a beneficial impact. Focus should be placed on AQMAs but mitigation measures should be applied to all developments, where practical.”
- “AQMAs will be the priority areas but we should improve air quality throughout Leeds.”
- “AQMAs close to the Strategic Road Network (Dewsbury Road AQMA close to M621) are a matter of concern for the Highways Agency. The Agency considers it appropriate to have a policy that requires development to address and mitigate against air quality impacts in the identified AQMAs.”

Issue 38: Air Quality- Policy Application – favoured options

Findings indicate respondents favour **Option 3: a policy that requires development throughout the whole of the City Council area to address and mitigate against air quality impacts in the following locations.** 43.75% of respondents agree with this approach (see Figure F.124).

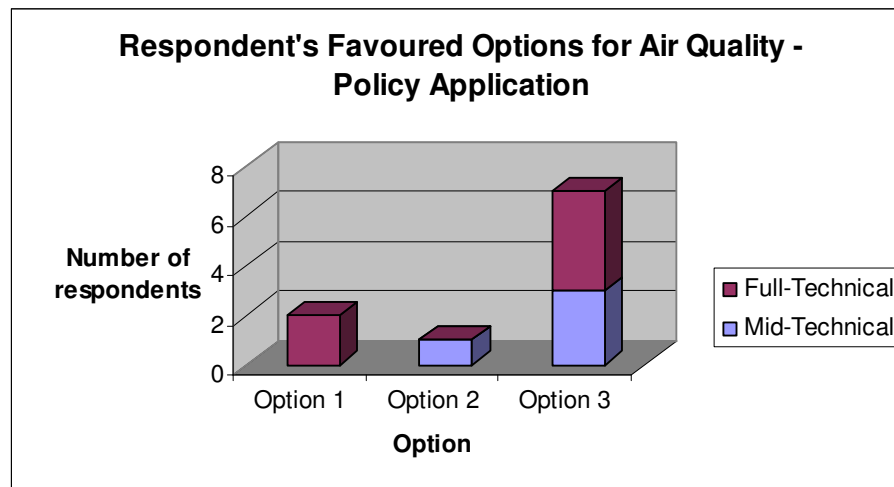


Figure F.124 Respondents' Favoured Options for Air Quality – Policy Application

Sustainability and Integration

The following section present data from the Sustainability and Integration section of the mid-technical and full-technical questionnaires

Issue 39: Site Accessibility – Waste and Minerals

Technical stakeholders were asked which of the following options is best for the Council to consider regarding the promotion of co-located waste and mineral facilities on sites which can be accessed by alternative modes of transport. Below is

a summary of responses for each of the options and comments which explain respondent choice.

Option 1: Continue to rely on road transport as the main mode of minerals and waste transfer as this retains flexibility.

37.50% of respondents disagree with this option and 31.25% agree. The remaining 31.25% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	1	4	5	31.25%
No	1	5	6	37.50%
Not specified	1	4	5	31.25%
Total	3	13	16	100.00%

Figure F.125 Issue 39: Option 1

The following comments were made regarding Option 1.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “No. Given that Leeds has access to alternative modes of freight transport such as rail and water, road transport should not be relied on as the main mode of minerals and waste transfer. Most parts of the Leeds Strategic Road Network are already operating at or over capacity. Additional freight traffic on the same will deteriorate the operating conditions on the SRN and lead to more air pollution.”

Option 2: Are additional facilities such as rail borne depots or wharfs which support water transport required, thereby reducing the need for road transport, and if so, should broad locations which would support the shared facilities for minerals and waste and other materials be identified?

The majority of respondents (56.25%) of respondents agree with this option. No respondents disagree and the remaining 43.75% did not state a preference.

Response	Frequency			Percentage
	Mid-Technical	Full-Technical	Total	
Yes	2	7	9	56.25%
No	0	0	0	0.00%
Not specified	1	6	7	43.75%
Total	3	13	16	100.00%

Figure F.126 Issue 39: Option 2

The following comments were made regarding Option 2.

Mid-Technical Response

Mid-Technical respondents had no additional comments on this issue.

Full-Technical Response

- “Wastes particularly still need to be collected by road from residential and commercial properties and transported by road to transfer stations and material recovery facilities, this is unavoidable. Strategic locations for waste management facilities are the answer. Rail borne depots or wharfs would be part of the strategic network where they are feasible and deliverable at a reasonable cost.”
- “Modal shift away from road transport is highly desirable for freight due to greater potential economies of scale leading to lower emissions. Friends of the Earth recognizes that there will still be a need for some road-based transport but would want to see policies which maximized the use of other forms of transport. With regard to the use of alternative fuels for lorry transportation, there should be a wider understanding of the environmental impact of these fuels. The use of biodiesel, for instance, should only be encouraged once firm sustainability criteria have been introduced at a national and European level.”
- “The waterways can be a low carbon, low pollution way of moving freight including waste and minerals (need to ensure the wildlife and recreational value of the waterways is not too adversely affected).”
- ““Yes. Leeds is fast growing as a regional capital and so is the need for transportation of goods. The strategic road network is already operating very close to capacity and sometimes even over it. In such circumstances, more alternative options for transportation are required in order to reduce the need for road transport.”

Issue 39: Site Accessibility – Waste and Minerals – favoured options

Findings indicate respondents favour **Option 2: additional facilities such as rail borne depots or wharfs which support water transport required, thereby reducing the need for road transport and broad locations which support the shared facilities for minerals and waste and other materials be identified.** 56.25% of respondents agree with this approach (see Figure F.127).

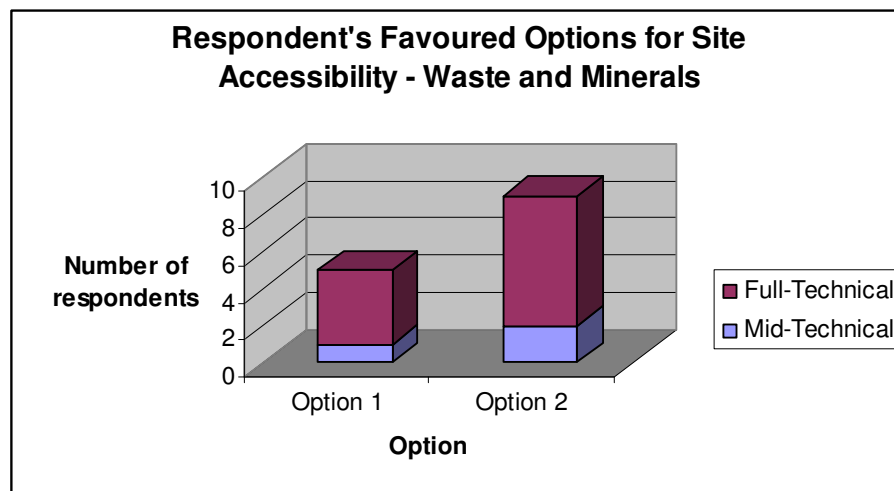


Figure F.127 Respondents' Favoured Options for Site Accessibility – Waste and Minerals

Issue 40: Integration of Resource Management Uses

Full-technical stakeholders were given a list of options for potentially compatible area characteristics and natural resources management facilities. Full-technical stakeholders were asked:

Which natural resource management use do you think will be compatible with existing land types? For example if you think that wind power facilities could be located adjacent to canals or rivers the please tick the box. (A tick indicates agreement of compatibility and a cross disagreement of compatibility)

Each area characteristic will be discussed in turn to determine which natural resource management facilities respondents identified as being compatible. Only 6 respondents in total completed this section the questionnaire so it is difficult to make firm generalisations based on this data.

30.77% of respondents agree that waste recycling & management is the most compatible facility for areas of flood risk zone 3 (High Risk). However, 15.38% disagree with this compatibility. 23.08% agreed that all other facilities are compatible with areas of flood risk zone 3 (High Risk) (see Figure F.128).

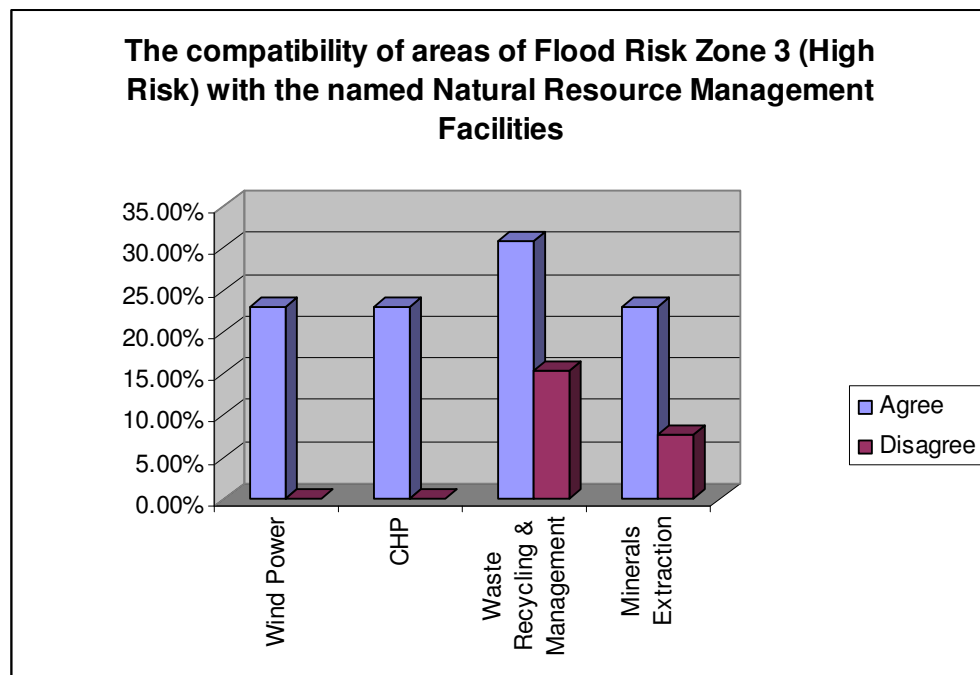


Figure F.128 The compatibility of areas of Flood Risk Zone 3 (High Risk) with the named Natural Resources Management Facilities

30.77% of respondents agree that waste recycling & management is the most compatible facility for areas of high water quality. Minerals Extraction was considered the second most compatible facility, at 23.08%. However, 15.38% disagree with this compatibility of both these options (see Figure F.129).

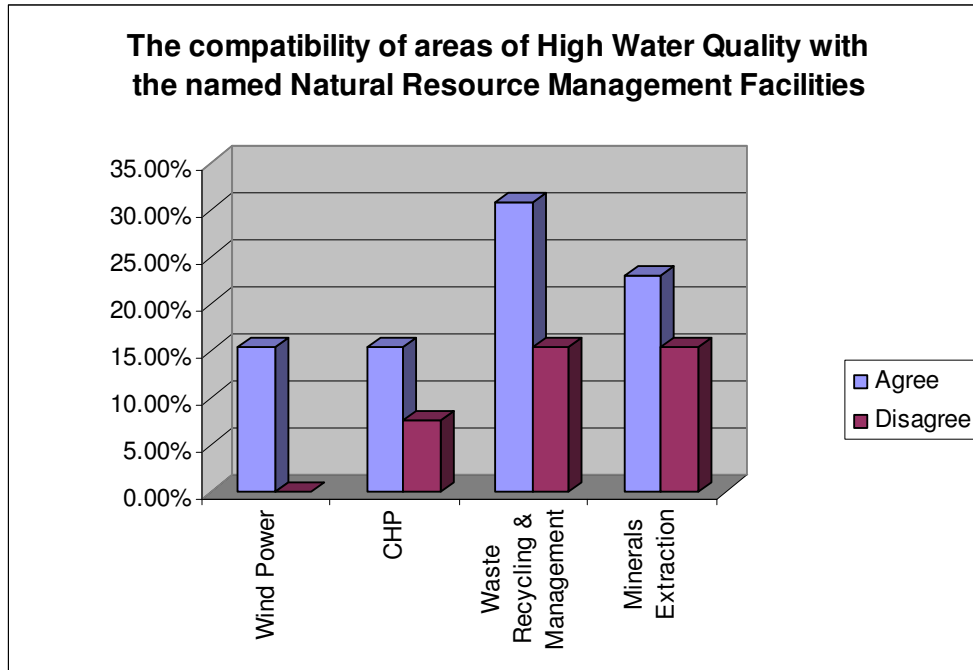


Figure F.129 The compatibility of areas of High Water Quality with the named Natural Resource Management Facilities

23.08% of respondents agree that all of the natural resource management facilities listed are compatible with areas of high water speed. The only two options that 7.69% of the respondents disagree with are waste recycling & management and minerals extraction (see Figure F.130).

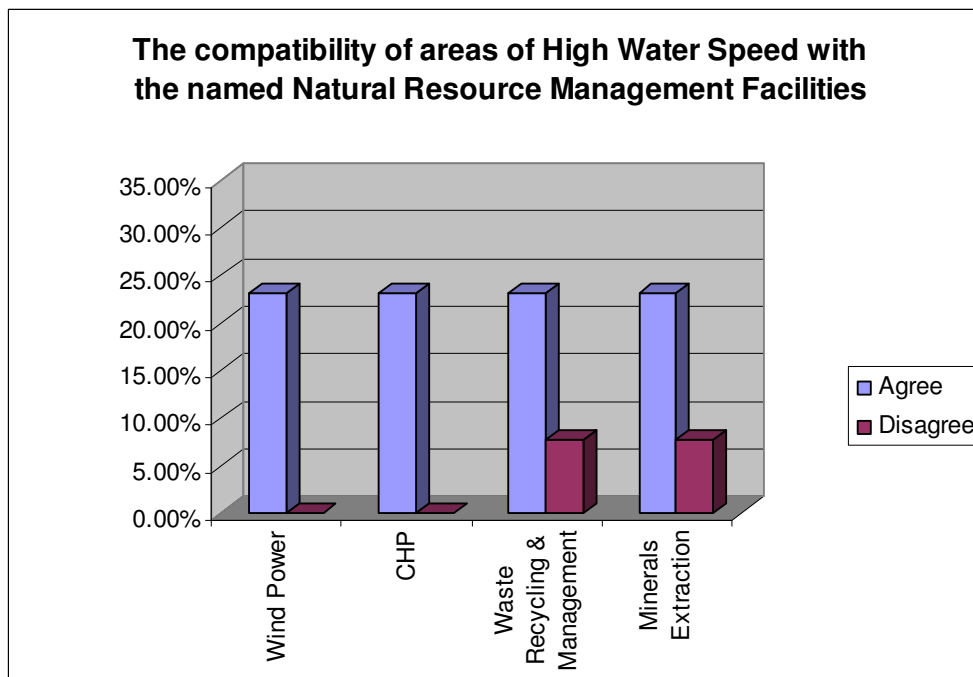


Figure F.130 The compatibility of areas of High Water Speed with the named Natural Resources Management Facilities

30.77% of respondents agree that waste recycling & management is the most compatible facility for areas of existing open space. Minerals Extraction was considered the second most compatible facility, at 23.08%. More respondents disagree than agree, 15.38% compared with 7.69%, that CHP is appropriate for areas of existing open space (see Figure F.131).

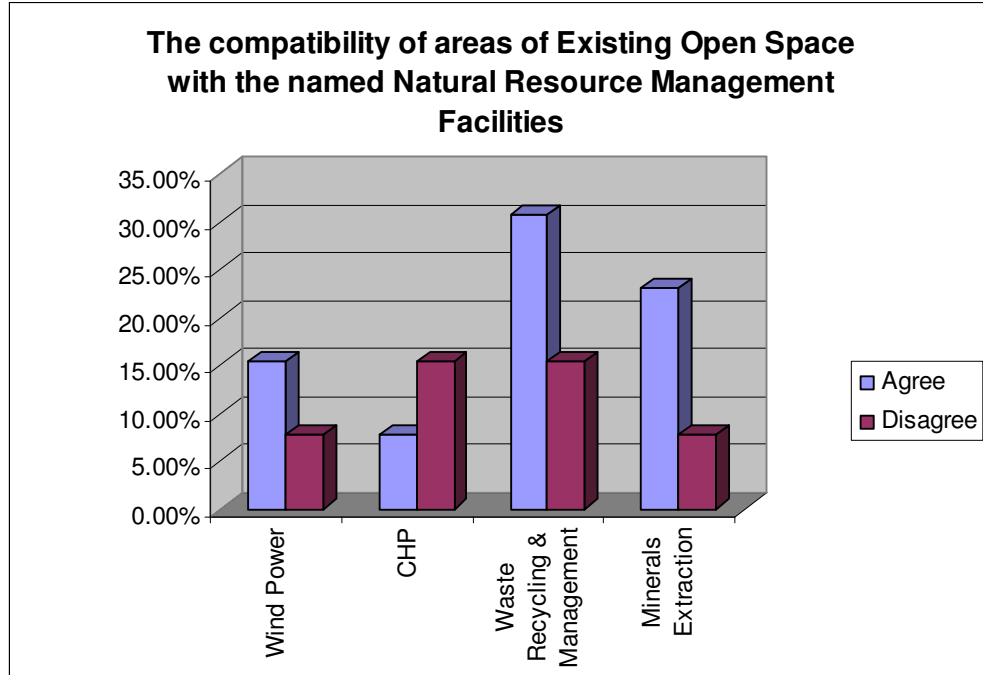


Figure F.131 *The compatibility of areas of Existing Open Space with the named Natural Resources Management Facilities*

30.77% of respondents agree that waste recycling & management is the most compatible facility for areas of biodiversity character. Minerals Extraction was considered the second most compatible facility, at 23.08%. More respondents disagree than agree (15.38% and 7.69% respectively), that CHP is appropriate for areas of biodiversity character (see Figure F.132).

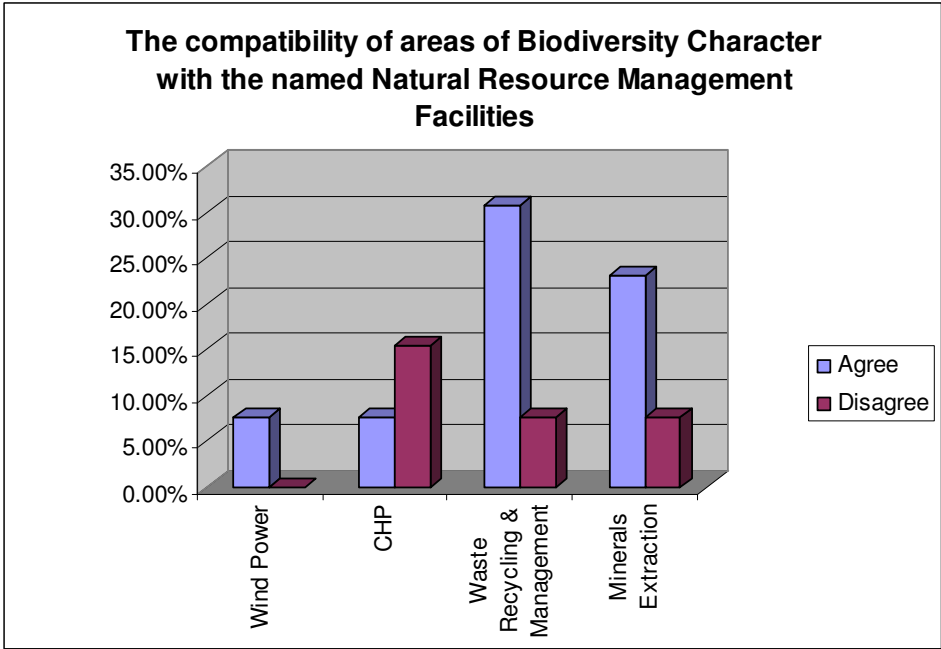


Figure F.132 *The compatibility of areas of Biodiversity Character with the named Natural Resources Management Facilities*

All respondents who specified a preference agree that the named natural resource management facilities are compatible with areas of mineral resource. 46.15% of respondents agree that waste recycling & management is the most suitable for areas of mineral resource, followed by minerals extraction at 38.46%. 23.08% of respondents agreed that both wind power and CHP are also compatible (see Figure F.133).

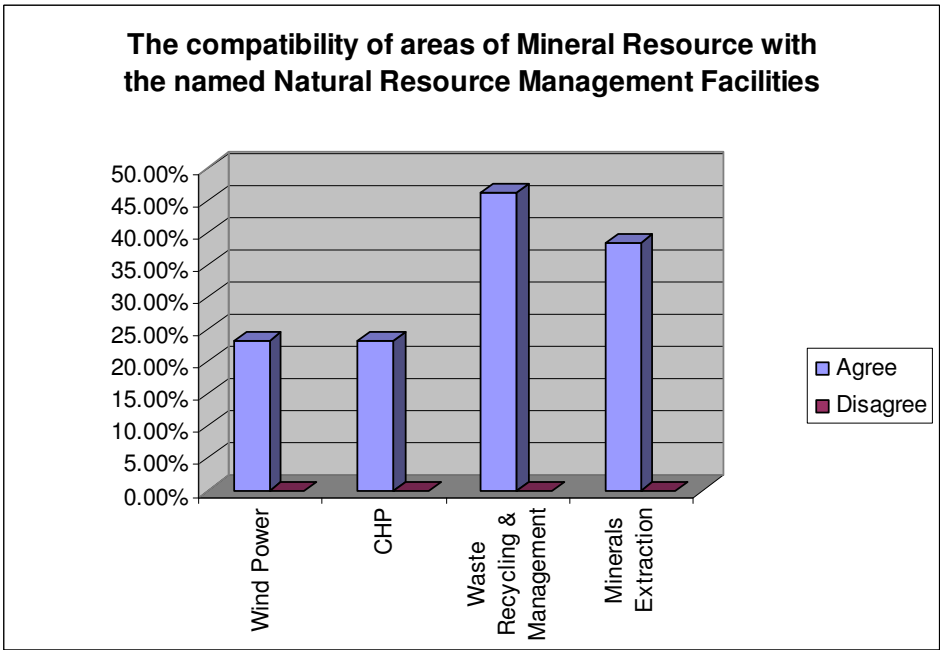


Figure F.133 *The compatibility of areas of Mineral Resource with the named Natural Resources Management Facilities*

38.46% of respondents agree that waste recycling & management is the most compatible facility for areas of biodiversity character. Minerals extraction and CHP were also considered highly compatible; 30.77% of respondents agreed. No respondents disagree with any of the natural resource management facilities in areas of existing source of heat generation (see Figure F.134).

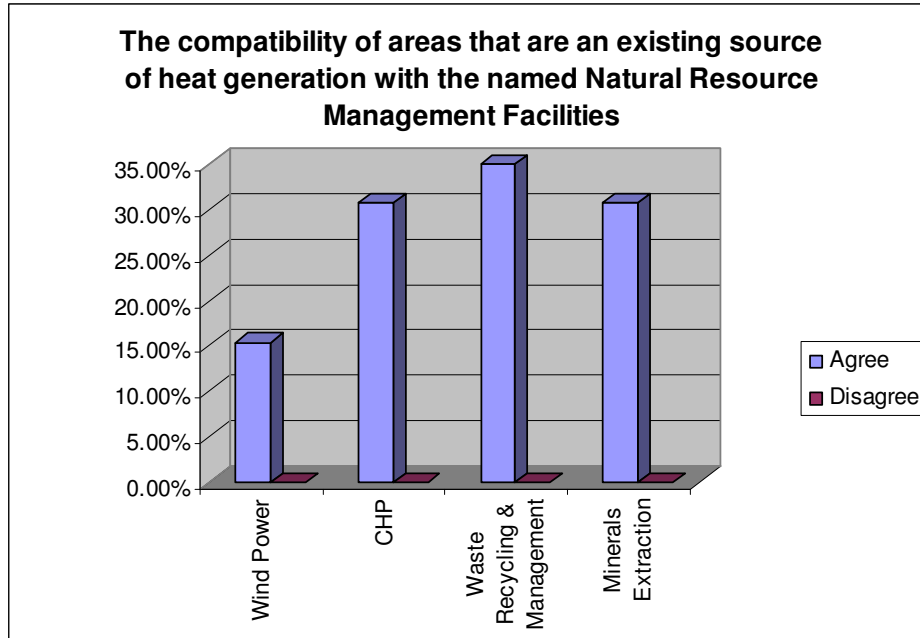


Figure F.134 *The compatibility of areas that are an existing source of heat generation with the named Natural Resources Management Facilities*

38.46% of respondents agree that waste recycling & management is the most compatible facility for areas of biodiversity character. CHP is the second most popular natural resource management facility for this type of area, at 30.77%. More respondents disagree than agree, 23.08% compared with 15.38%, that mineral extraction is appropriate for areas identified for urban growth (see Figure F.135).

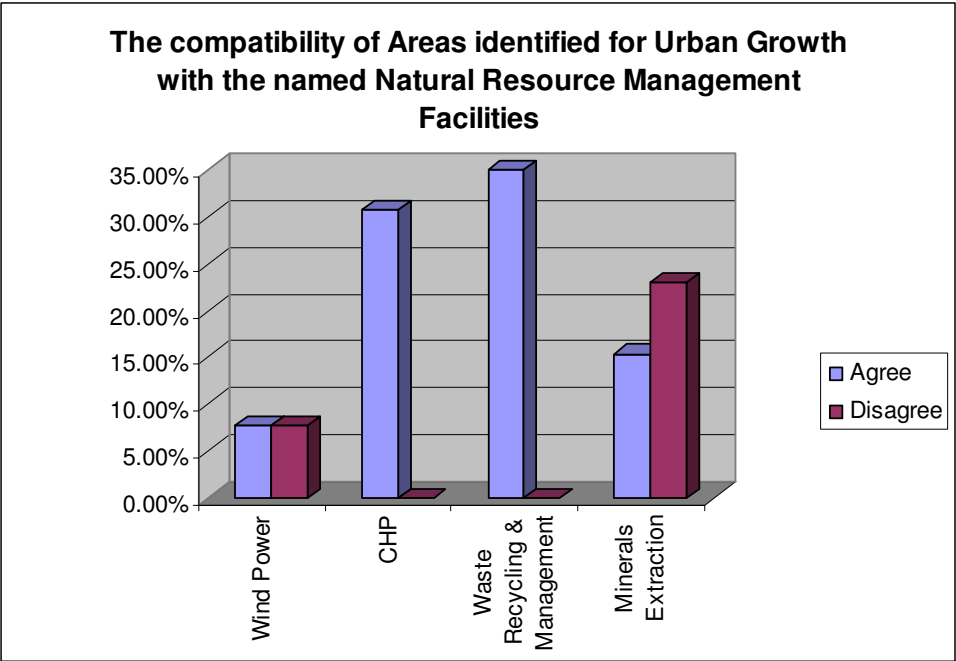


Figure F.135 *The compatibility of Areas identified for Urban Growth with the named Natural Resources Management Facilities*

The majority of respondents, 38.46%, agree that both waste recycling & management and minerals extraction are the most compatible facility for canals and rivers (see Figure F.136).

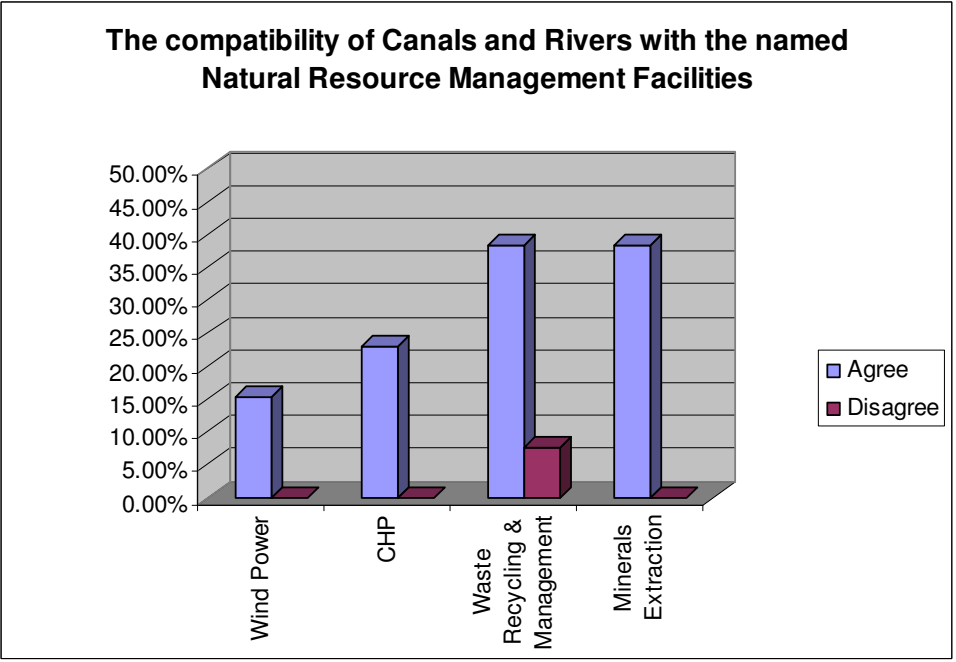


Figure F.136 *The compatibility of Canals and Rivers with the named Natural Resources Management Facilities*

All respondents who specified a preference agree that the named natural resource management facilities are compatible with areas adjacent to existing railway lines. 46.15% of respondents agree that waste recycling & management is the most suitable for this type of area, followed by minerals extraction at 38.46%. The least popular natural resource management for areas adjacent to existing railway lines is wind power, only 15.38% of respondents selected this option (see Figure F.137).

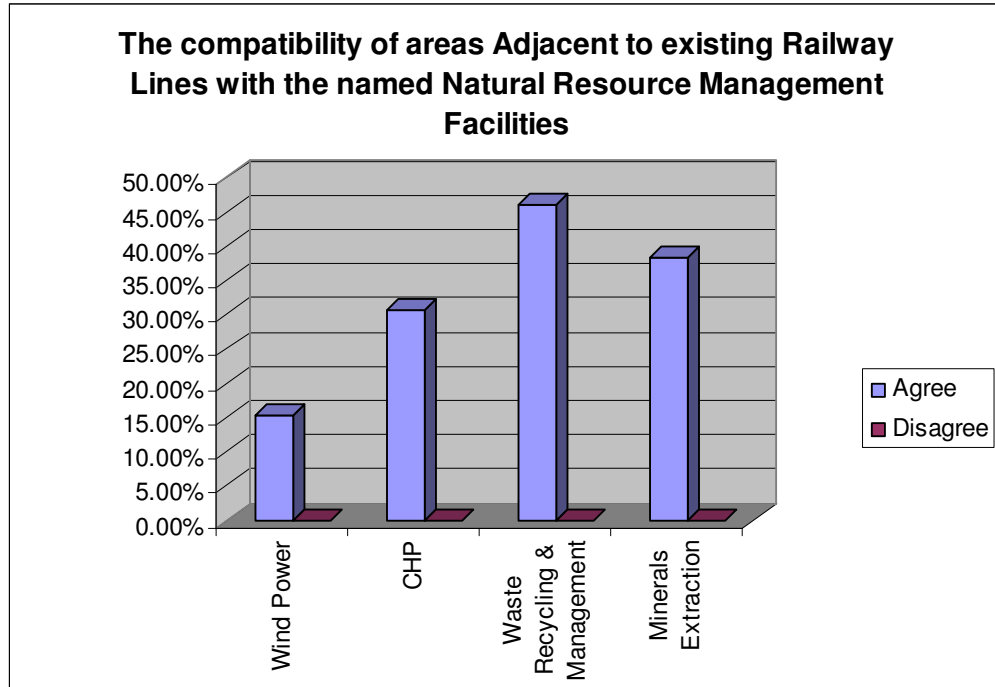


Figure F.137 The compatibility of areas Adjacent to existing Railway Lines with the named Natural Resources Management Facilities

Issue 40: Integration of Resource Management Uses – favoured options
Waste Recycling & Management is the most suitable option for all types of area. **Mineral Extraction** is considered to be the second most suitable option for all types of area. In particular areas of mineral resource and areas adjacent to existing railway lines are considered to be the most compatible with these two natural resource management facilities. When considering the most compatible locations for **CHP**, respondents' favoured areas that have existing source of heat generation, are identified for urban growth or are adjacent to existing railway lines. The use of **Wind Power** was considered to be the least compatible in the majority of locations. The favoured area characteristics for wind power are areas of flood risk zone 3 and areas of high water speed.

Issue 41: Integration of Resource Management Uses- Multiple Land Uses

Full-technical stakeholders were also asked:
If a particular type of area is compatible with different types of natural management use, then a particular site could be used for multiple uses. Which natural resource management facilities would be compatible if developed on one site?

Issue 41: Integration of Resource Management Uses – Multiple Land Uses-favoured options

All of the suggested multiple land uses were seen as compatible. Both **Waste Recycling & Management Facilities with Minerals Extraction** and **Waste Recycling & Management Facilities with CHP** were seen to be the most compatible options for multiple land use; 30.77% of respondents said 'yes' to these options. All of the other options were seen as viable by 23.08% of respondents (see Figure F.138).

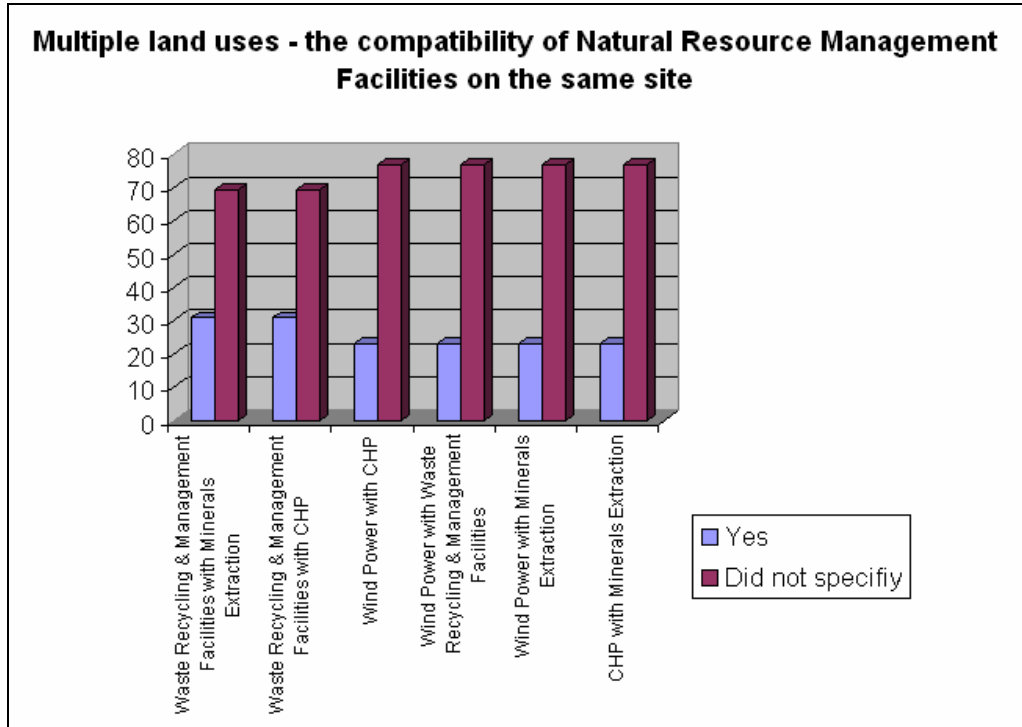


Figure F.138

Multiple land uses – the compatibility of Natural Resource Management Facilities on the same site

Appendix G - Stakeholder Workshop Attendance Figures

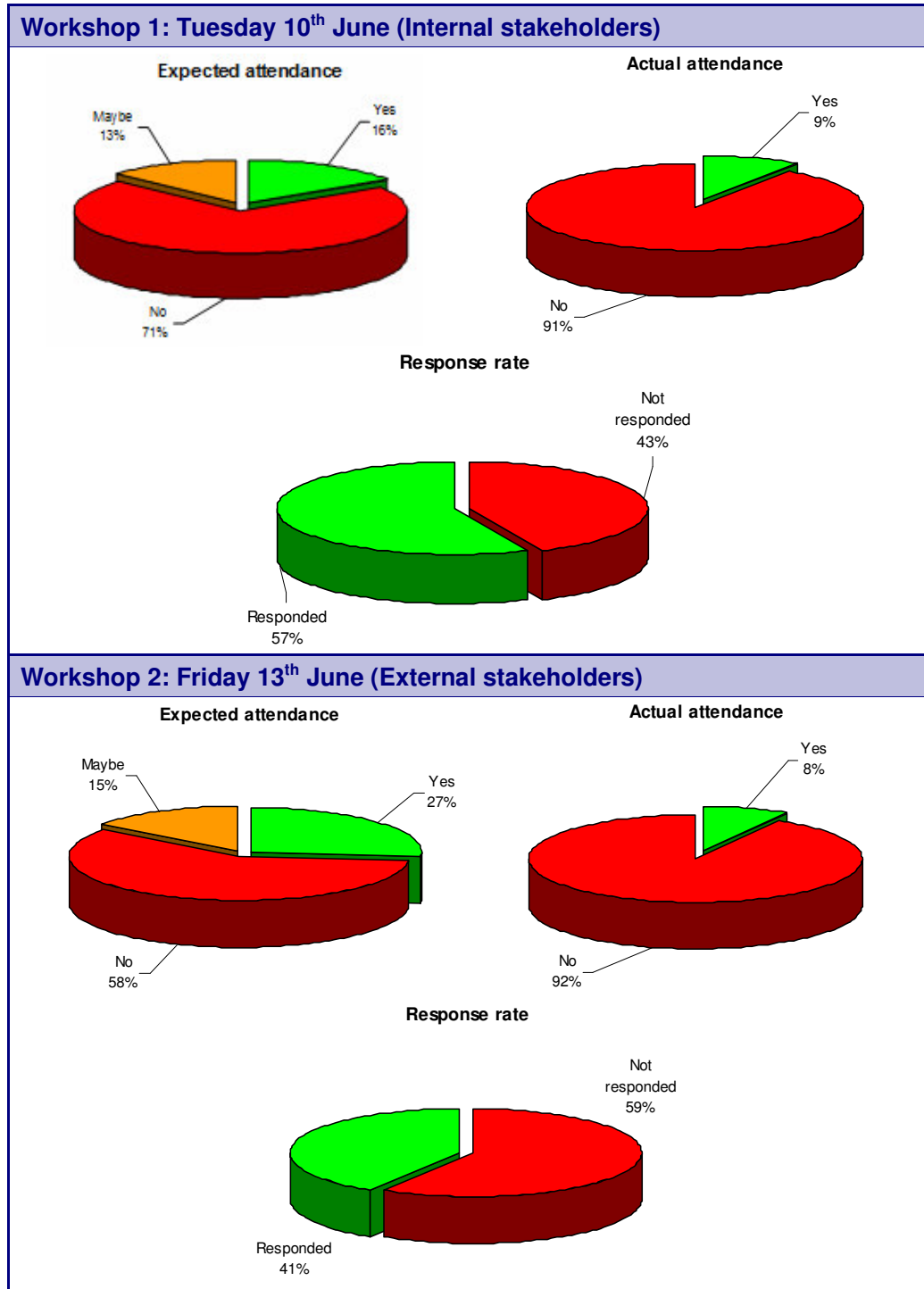


Table G.1 Stakeholder Workshop attendance figures

Appendix H - Supermarket Exhibition Reflection Summaries

Members of the project team who attended Supermarket Exhibitions were asked to give a short summary of the main issues arising in their experience. Responses are detailed in Table H.1.

Team member and role	Comments
Christine Bostock (Minerals and Aggregates Technical Expert)	<p>My reflection on the consultations:</p> <ul style="list-style-type: none"> • Types of venue. The number and quality of responses seemed to be better in supermarkets than in the city shopping centres - in general the people in the supermarkets were from the local area but almost all were from Leeds whilst there were many visitors to the city passing through the shopping centres. • Types of people. Generally, the people who showed most interest were older generations who had concerns for the future and time to stand and ask questions. • There was no lack of interest in waste. Not everyone understood the purpose of the survey however once we got over the initial discussion of who / why / when of refuse collection almost everyone I spoke to had serious concerns about how much is produced and how we are going to dispose of it. There was not a great deal of detailed knowledge which surprised me – I was expecting at least one person per venue to be a waste fanatic with in depth knowledge of the subject. • There appeared to be absolutely no interest in minerals which was very disappointing. • People were interested in taking an active part in the plan making process but no one seemed to trust Leeds City Council to take comments on board. Several people said that they were fed up of Leeds “consulting” , that they never heard the outcomes and only found out what the Council were doing when it happened which was often too late. • Most people felt that “recycling” was the answer to waste problems but had little conception of what happens to recycled products or what recyclates can be used for e.g. one lady was all in favour of recycled products but wondered who would use second hand electrical goods. Very few understood the concept of recovery. • There seemed to me to be great interest in the Natural Resource Flow Analysis. People thought it was a good idea to know how much how long etc but didn’t see it as applying to them. • A repeated comment related to the Water section. People are frightened of flooding – damage to property, disruption etc but were not all receptive to the idea that hard standings should be discouraged. This seemed to be seen as LCC imposing further restraint on local people. • Myself and Marie-Lou met with one of the main minerals developers, Aggregates Industry after the consultation process closed and the job number was also closed. It was an interesting meeting with several minerals and waste operators present. However, whilst they promised to respond formally I am not aware that they have done so. The essence of their comments was that Leeds should carry out a sieving exercise and identify areas for mineral development. Almost everyone there was concerned that their permitted areas were almost worked out and the prevailing attitude in Leeds is that permissions are resisted.

<p>Marcus Thompson (Consultation Expert)</p>	<ul style="list-style-type: none"> • I took part in all the Leeds NRWDPD supermarket exhibitions. The overwhelming memory of the process was the consistent request and statements by all groups of the public with regards to recycling. Across the board support for thorough and complete recycling schemes were wanted by the public. At every supermarket exhibition we were asked if we were “anything to do with recycling?” The public expressed concern about the lack of a scheme that they found easy to use and very often anxiety and concern was expressed about green and brown box recycling schemes and what could and couldn’t be included in each box. It would be fair to say that from my experience the public desire a comprehensive recycling system for domestic waste. • Another consistent theme that was raised by the public was the notion/feeling that “the Council will do what they want anyway, what’s the point?” This view was again expressed across a broad demographic and geographical range. Allied to this each area visited seemed to express feelings that their neighbourhood was the neglected one. The public who used the supermarkets at the edge of the city limits expressed a feeling of remoteness due to geography whilst the public in supermarkets which were more central expressed that they were forgotten about due to their lower incomes. In all cases the members of the public were articulate and knowledgeable about both their own neighbourhood and the challenges it faces and the citywide challenges Leeds faces. I believe it would be accurate to say that many members of the public have a sceptical view of Leeds City council and how their own views are represented. • The majority of the public seemed to have both an understanding of and an agreement to the necessity to plan accurately for the uses and management of the natural resources of the City/area/region. • The theme of land use was seized upon by many members of the public, this was especially the case when linked to waste/waste transfer stations and a recognisable “Not in my back yard” attitude, this seemed especially prevalent in the south of the city where motorway transport links exist and a number of post industrial heavy industry sites are available. The land use issue was often taken to mean “development” and many members of the public were concerned about what they considered to “inappropriate” development, it must be stated that this ranged from re-use of former industrial sights and regeneration to schemes where a small number of houses had been built that a member of the public disliked. • A commonly expressed theme was the notion that “all the money is in the middle of Leeds in skyscrapers” and not in the outlying areas. • Overall, although interested and grateful for the opportunity to give their views, the public were sceptical it would make any difference and often felt that it had nothing to do with them” or didn’t have an effect upon their lives.
<p>Martin White (Waste Technical Expert)</p>	<p>The most common themes emerging at the Supermarket Exhibitions from members of the public were:</p> <ul style="list-style-type: none"> • Over consultation • Desire to change and do something. • Difficulties in storing recyclable materials particularly people who live in flats. • Linked to above too few bin collections for recycled materials and access to local facilities sometimes difficult. • People are stealing extra recycling bins from their neighbours who aren’t using them. • Which plastics can be recycled? It is unclear to people. • I didn’t hear many comments on incineration or site specific issues. • General need for visible action i.e. seeing real change on the ground and some sceptics about whether anything would ever change. • People want to achieve a high level of recycling and want to be more informed about where materials go once collected. • People are generally in favour of conservation and a more efficient use of resources. • Buildings need to be made more efficient. • Faster action is required.

<p>Gillian Nisbet (Land Use, Water Resources and Air Quality Technical Expert)</p>	<p>I wrote down any comments made to me at the Kirkstall exhibitions in the comments book, however the issues I remember arising are summarised below:</p> <ul style="list-style-type: none"> • DPD / Consultation Process – One lady came back to the exhibition on the 2nd day, and commented that she could not understand the questionnaire and what we were asking her opinions of. I talked her through the questionnaire and she made some comments, but ended up filling out the back of the sheet with some general comments. In essence, her view was that as a member of the public she is not qualified to answer questions about detailed options, but she could have given more comments on the general themes. • Waste – Most of the comments related to the way in which the council manages its recycling – there is confusion about what can be put into the recycle bins in Leeds and people have not received any information to assist. Also one person suggested that all recyclable products have an easier to understand symbol system for recycling (although this would require national agreement). • Water - One young mother specifically commented on the problems of surface water runoff and preventing the surfacing of gardens to improve drainage (this was before she was aware that this is one of the issues listed). • Air Quality - An elderly man commented on the problems of air quality and other nuisance caused by 'rat running' vehicles through residential streets
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Table H.1 Supermarket Exhibition Attendee Reflection Summaries

Appendix I - Questionnaire Respondent Demographics

Gender and Age of respondents

Only public and mid-technical respondents were asked their gender and age. 62.50% of the 40 questionnaire respondents were male, 32.50% female, and 5.00% didn't specify their gender (see Figure I.1).

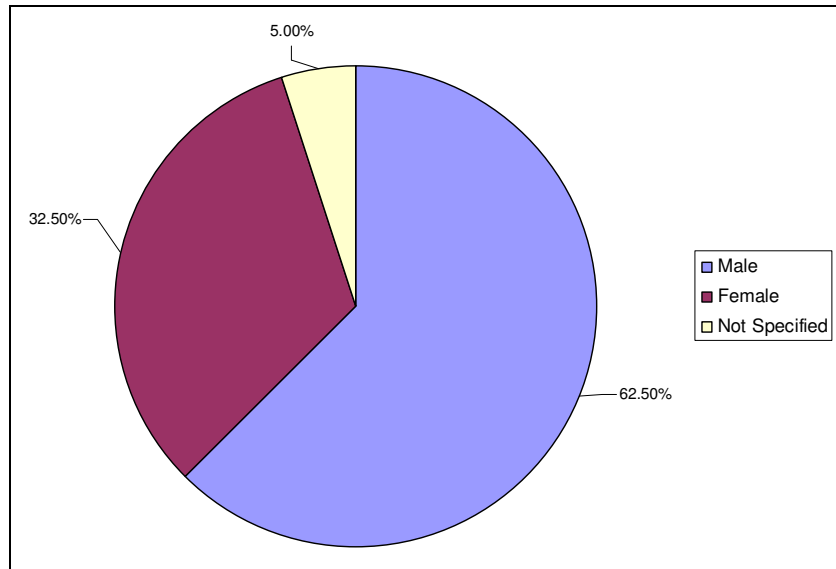


Figure I.1 Questionnaire respondent gender (public and mid tech only)

80.00% of the public and mid-technical questionnaire respondents were over the age of 40 years. No respondents were under the age of 21, 5.00% between 21-30 years and 7.50% between 31-40 years. The remaining 7.50% did not answer this question (see Figure I.2).

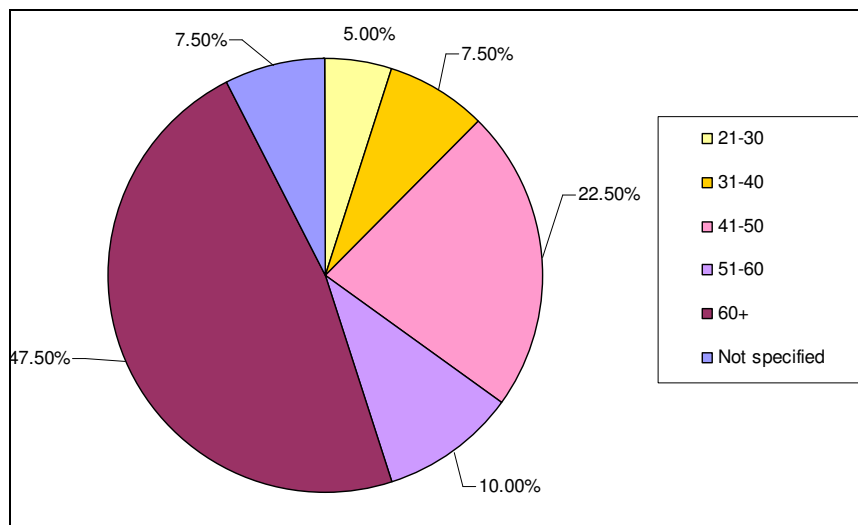


Figure I.2 Questionnaire respondent age (public and mid tech only)