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## Report of the Director of City Development

### Development Plan Panel

Date: 11 May 2010

**Subject: Leeds LDF Natural Resources and Waste Development Plan Document –  
'Policy Position' Consultation (Initial Report of Consultation)**

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**Electoral Wards Affected: All**

**Specific Implications For:**

Equality and Diversity

Community Cohesion

Narrowing the Gap

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## EXECUTIVE SUMMARY

1. The Natural Resources and Waste Development Plan Document is a significant part of the Leeds Local Development Framework (LDF). The purpose of this Plan is to provide an integrated approach to managing natural resources and waste in Leeds as part of the spatial planning framework. This Plan (along with its evidence base) has been subject to "Issues and Alternative Options" consultation, which then informed a 'Policy Position' report laying out the preferred approach of Leeds City Council.
2. Consultation and public engagement has been undertaken on this Policy Position report and the summary of responses is presented here.

## **1.0 Purpose Of This Report**

- 1.1 To advise and update Development Plan Panel members on initial results from consultation and progress in preparation of submission documents for independent examination.

## **2.0 Background Information**

- 2.1 Members are aware that a series of Development Plan Documents are currently being prepared as part of the Local Development Framework. Once adopted, these will form part of the statutory Development Plan for Leeds, setting out a framework for planning policy and where appropriate, site specific allocations. Within this context, the scope of the Natural Resources & Waste DPD is to provide a basis to plan for waste management and to ensure development considers the resource and waste implications implicit in its activities, together with the wider protection and management of natural resources.

- 2.2 As statutory plans, they are prepared under a process prescribed by national regulations. The Natural Resources and Waste DPD is being prepared under the following programme:

- Engagement and Information gathering stage (Issues & Alternative Options)
- 'Policy Position' stage
- Publication stage
- Submission stage
- Public Examination
- Adoption

- 2.3 The Issues & Alternative Options stage was successfully completed in 2008 and a Policy Position report approved by Development Plans Panel in October 2009 (for a six week period of informal consultation). Consultation on this document is now complete and an initial summary of responses received is presented here.

## **3.0 Progress to Date & Next Steps**

### Progress to date

- 3.1 A six week consultation effort was progressed from 18 January to 1 March 2010. A range of consultation methodologies were employed to engage:

- Statutory consultees (including: Government Office, Environment Agency)
- Internal stakeholders (including: Members)
- External stakeholders (including: Highways Agency, Parish Councils)
- Seldom heard groups (including: Leeds Voice Environmental Forum)
- The general public

Stakeholders were those identified from the beginning of the Plan development and continually updated with additional interested parties from previous consultation efforts or ongoing communication.

- 3.2 Information for consultation was presented in an accessible, plain English manner and a 'non-technical' summary was produced to assist involvement and understanding. The information made available (through physical hand-out, post or electronic format) was:

- Non-technical summary document
- Response sheet (questionnaire and comment format)
- Policy Position Document

- Appendices (background information figures to support main document)
- Map Book (specific information on each of 210 sites potentially affected and overview maps)

Background evidence reports (such as waste site selection reports, planning information or sustainability reports) were available online, or on request by post.

- 3.3 Consultation comprised different activities and methods as appropriate to different consultee groups. Methods were informed by evaluation of the Issues and Options consultation. These included:
- Individual letters to owners or tenants of specific sites that may be affected
  - 2 workshop meetings convened with invited stakeholders (400 invited)
  - 2 drop-in sessions prior to the workshop sessions
  - advertisements and press releases about the consultation
  - use of website, libraries and 'one-stop shops' to make documents accessible
  - 2 sessions with hard to reach groups facilitated with Planning Aid (Leeds Tenant's Federation, Leeds Building College students)
  - 12 supermarket /shopping centre exhibitions spread across Leeds district.
- 3.4 Responses and views were collected via letter and email responses, notes taken and post-it notes (workshop sessions), notes of comments during other sessions and a formal response questionnaire.
- 3.5 Details of the consultation methodology and the responses are all presented in a Consultation Report currently being completed. All DPD consultation responses have been recorded. The key patterns of response to each topic of the NRWDPD are discussed below however, it should be noted that consultation responses were detailed, particularly as comment was encouraged, and will be produced in full as appendices to the full Consultation Report.
- 3.6 A total of 101 written responses were received either by email or post. No verbal responses were received that were not subsequently followed by a written response. Of these responses 40 included the formal response sheet although not all policies were necessarily responded upon.
- 3.7 Many of the other responses dealt with a single specific issue, such as 31 responses regarding the safeguarding of wharves, and made no comment on other topic areas. A number of detailed letters were received covering either specific topics such as minerals, or the views of a particular stakeholder such as the Environment Agency.
- 3.8 It should be noted that this consultation has a relationship to other engagement activities recently undertaken by Leeds City Council, including the Core Strategy Preferred Approach consultation and waste PFI procurement process. Within this context, four potential waste sites were therefore identified in the NR&W DPD Policy Position consultation material. In parallel, the PFI ongoing consultation exercise is engaging the public to find out what their concerns are about the proposals for sites and technology. An outcome of this process has been a significant number of responses have been received objecting to locating an Energy from Waste facility in east Leeds.
- 3.9 The preliminary overview of the NRWDPD consultation responses is shown below, for each topic theme covered in the consultation document. The numbers in the table shows the breakdown of the 101 written responses. Key comments also include comments received at workshops and Planning Aid facilitated sessions.

## Land Use

The majority of responses received about the land use policies were representing organisations, including a significant amount of responses from individuals or companies in the boat and barge industry, or associated with moving materials by water.

Question	Agree	Disagree	No Answer
Do you agree that policies are needed to ensure the efficient use of previously developed land?	33	3	65
Do you agree that we should encourage more tree planting and resist healthy tree and vegetation loss when development takes place?	29	2	70
Do you agree that railway sidings and canal wharves which are, or could be, used to enable the transportation of minerals and/or waste materials by rail and canal should be safeguarded for that purpose?	60	6	35

- Strong support for all land use policy positions (90%+ approval by those who chose to answer)
- The safeguarding of railway sidings and wharves policy position had twice as many respondents in favour than any other Policy Position
- The safeguarding of canal wharves in particular has strong support, locally, regionally and nationally.
- Objections were received to specific wharf or sidings sites; British Waterways and Network Rail responded with concerns over individual sites.
- Canal wharf support comes from industry specialists with specific knowledge as well as individual enthusiasts and groups.

## Minerals

All but three of the responses received on Mineral policies came from industry groups, site owners / tenants, or Statutory bodies with an involvement in Minerals.

Question	Agree	Disagree	No Answer
Do you agree that we should protect mineral resources from development that would prevent them being used in the future and that existing mineral reserves should be safeguarded to reduce pressure for new sites to be exploited?	31	0	70
Mineral-related activities are often located in general industrial areas and we want to make sure that these locations are not lost to other uses. For this reason we propose to safeguard existing mineral-related sites (these are shown as B1 sites on Maps A1 and A2). Do you agree with this approach?	30	1	70
Do you agree that we should find alternative uses for quarries, once they are exhausted, such as nature conservation or recreation, rather than filling them with landfill waste first?	24	8	69

- Strong agreement to all three Policy Questions
- A small amount of disagreement (8 responses) mainly all site specific as opposed to policy specific
- An objection was received by the coal authority, regarding the need for the DPD to identify coal reserves across the District

- Detailed points made with regards to specific sites at the stakeholder workshop
- Comments regarding reuse of sites and nature conservation.

### Water Resources

All responses to this topic came from government organisations or companies.

Question	Agree	Disagree	No Answer
Do you agree with the measures that we have suggested for minimising water consumption? Do you have any further suggestions?	28	0	73
Do you agree with the measures that we have suggested to reduce flood risk? Do you have any further suggestions?	29	3	69

- Strong agreement to both policy questions
- Comments encouraging grey water recycling, water use reduction, water efficiency.
- Comments regarding levels and type of flood risk and flood protection level depending on nature of land or buildings at risk.
- Comments supporting stronger stance on protection of water quality

### Air Quality

The majority of respondents on air quality were organisations and statutory organisations.

Question	Agree	Disagree	No Answer
Do you think planners should be able to require the developments include measures for improving air quality?	24	3	74
We are investigating whether it would be beneficial to create Low Emission Zones (LEZ) in some areas of the District. These would be areas where the more polluting vehicles would not be permitted. Do you think this is a good idea?	18	7	76

- Strong agreement for Policy position 10 regarding developments improving air quality
- Agreement for policy position 11 regarding Low Emission Zones
- Comments upon Low Emission Zones depending upon location.
- Comments with regards to air quality risk and waste incinerator(s) both in short term as a cumulative effect.
- Comments about electric car provision.
- Comments about future developments impact on air quality after mitigation.
- Concerns about LEZ and possible impacts upon other aspects of the City.

### Energy

Question	Agree	Disagree	No Answer
Do you agree that Leeds needs to do significantly more to encourage energy production from renewable energy sources?	30	0	71
Do you agree that we need to encourage wind energy provision but consider the impacts on local landscape, built-up areas, nature conservation, highway safety, aeronautical radar and transmission mast reception?	28	5	68

- Strong agreement on both Policy questions
- Comments ranging from a policy point of view to a detailed technical and engineering point of view
- Comments about solar power and waiting for next generation of solar technology
- Comments about wind power location
- Comments about sceptical belief in energy saving, mentioning production of petrol driven cars.
- Objections to Energy from Waste
- Comments agreeing with Energy from Waste especially for Industry
- Comments supporting all forms of renewable energy
- Comments regarding the practicalities of energy generation with regards to Grid access.

## Waste

Waste comments were received from a mixture of statutory bodies, organisations and individuals.

Question	Agree	Disagree	No Answer
Do you agree that we should meet our need to identify sufficient land for managing our waste by safeguarding existing waste sites across the District, providing a limited number of strategic sites for larger facilities in the industrial areas of the Aire Valley and identifying where there are existing industrial estates that have potential for more waste related activities to take place?	21	7	73
Do you agree with the allocation of the four sites in the Aire Valley (as shown on Maps E) that have been identified as strategic waste sites?	20	6	75
Do you agree with the five industrial estates (as shown on Maps F) that have been identified as appropriate for waste and mineral uses? Do you know of any others that you think we should consider?	18	7	76
Do you agree that we should discourage landfill provision and only allow it when there is a proven need for it and when it can be demonstrated that it will not be harmful to the environment or quality of life of local people?	23	5	73

- Agreement for Policy positions regarding waste
- Support for waste reduction
- Objections or concerns about specific sites
- Support and suggestions for specific sites
- Objections to using specific sites for Energy from Waste (EFW) facility
- Comments that all EFW sites are within the same area and consequently affect adversely the same residents.
- Comments by waste companies of as technical nature.
- Comments by waste companies regarding geographical provision of sites in north and north west Leeds.
- Comments about inclusion of consultation comments and timeframe
- Comments both agreeing with and comments disagreeing with the “zero waste” aim policy.
- Comments linking waste to land use with regards to canals and navigable rivers

## **Next Steps**

- 3.10 The information derived from the consultation results will be analysed to consider:
- update of information / evidence base
  - incorporating ideas or representing views in final policy
  - removal or change of policy in response to views
  - requirement for additional work to address an issue
  - influence or change on other LDF documents (including the Core Strategy).
- 3.11 Within the context of the above, further detailed analysis will be undertaken regarding the consultation responses. These will be reported to Panel in due course, as a basis to identify actions and recommendations in the preparation of the draft Publication document.

### **4.0 Legal and resource implications**

- 4.1 Once adopted (following Independent Examination), the Natural Resources and Waste Development Plan Document will form part of the Local Development Framework for Leeds. The preparation of LDF documents continues to make demands on staff resourcing.

### **5.0 Implications for council policy and governance**

- 5.1 None at this stage

### **6.0 Conclusions**

- 6.1 This report has provided an overview of the Policy Position consultation and how this feeds into the next steps in relation to the preparation of the NRWDPD.
- 6.2 The results of this consultation will be used to prepare a draft publication document of the Natural Resources and Waste DPD. This will be the final policy document and under the process, will be made available once completed for final consultation comment. The preparation of a detailed DPD is a complex process and must be integrated with the other documents in the LDF. Continued work is therefore necessary to complete, and where necessary review, the work currently underway to ensure that the emerging document is both sustainable and can be evaluated as sound.

### **7.0 Recommendations**

- 7.1 The Development Plan Panel is asked to note the progress and next steps in relation to the preparation of the LDF Natural Resources and Waste Development Plan Document and the next stages in production of the Publication draft.