

LAND USE AND FREIGHT COMMENTS					
Ref	Name of respondee	Organisation	Comments	Response	Action
4	Dr. Roger Lorenz	N/A	<ul style="list-style-type: none"> Supports safeguarding wharfs. Providing a direct handling and freight route with the Humber ports. 	Support welcomed.	
5	Mike Latham	Bayford Oil	<ul style="list-style-type: none"> For information we successfully use barges to import product into our storage terminal here in Leeds. Each barge carries the equivalent of 18 articulated lorry loads and we average 2 barges per week, which equates to 1,872 lorry journeys from Leeds to Immingham and back. We couldn't operate without barges and would advocate other businesses to look at the advantages of waterborne transport. 	This is important evidence that helps to justify the need for the Proposed Policy.	Add info. to evidence base.
6	Mike Harrison	RMS Europe Ltd	<ul style="list-style-type: none"> Welcome any positive action to move cargo by water further inland 	Support welcomed.	
7	Roger Clay	Avon Navigation Trust	<ul style="list-style-type: none"> Fully support the proposal of Leeds City Council to retain wharfage and to zone waterside land for industrial use. 	Support welcomed.	
8	Dave Prior	N/A	<ul style="list-style-type: none"> Support any action taken by Leeds council to prevent any further destruction of our needed canal wharves. 	Support welcomed.	
9	A E Jones	Member of the Commercial Boat Operators Association	<ul style="list-style-type: none"> It is highly commendable that Leeds is actively protecting water born freight potential by safeguarding wharves. The piecemeal property and retail development of former commercial waterside sites effectively inhibits any future revival of waterway transport with its long-term environmental, economic, and social benefits. It is much to Leeds' credit that their planning policy considers future benefits as outweighing short-term gains. 	Support welcomed.	
10	Geoff Wheat	Humber Barges Association	<ul style="list-style-type: none"> As an operator of freight barges on the Aire & Calder Navigation, I must stress the importance of identifying and reserving for future use those wharves where freight can be handled, or could be at some later stage. One might laugh at the concept of a passenger railway without any stations, or of a motorway without exits, but this situation is approaching on our freight waterways. It is becoming more and more difficult to attract freight as there are often no 	Support welcomed.	

			<p>convenient wharves for the transshipment of the cargo. As freight rates are always tight, and even more so in this recession, any suggestion of moving further up or downstream may lead to the extra road haulages involved to kill dead a project.</p> <ul style="list-style-type: none"> I would suggest that the whole of the water's edge in Leeds be reviewed to ascertain that no disused wharves are left unrecorded, and to make the highest priority that of checking that no industrial use could be better placed alongside that wharf. Whilst waterside housing might be more saleable than that away from the rivers and canals, it surely makes no sense to turn away potential freight because it "has nowhere to stop". 	<p>Agree, given the overwhelming support for the Policy and the evidence that has come to light that there is demand for more wharfage in Leeds.</p>	<p>Review water side to double check if there are any further suitable wharf sites that need safeguarding.</p>
11	Tim Lowry	N/A	<ul style="list-style-type: none"> With reference to your Leeds consultation I strongly believe that rail lines and wharves must be conserved for the good of the environment. It is important to get lorries off the roads and use environmentally friendly water and rail. This is Government policy and is referred to as MODAL SHIFT. 	<p>Support welcomed.</p>	
12	Barbara Panvel	N/A	<ul style="list-style-type: none"> I'm writing to agree with the proposal 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. I hope that Leeds will take a lead in this and, in so doing, encourage others to follow suit, reducing emissions, road congestion and fuel use. 	<p>Support welcomed.</p>	
13	John Branford	Branford Barge Owners	<ul style="list-style-type: none"> Branford Barges would like to take this opportunity to write to Leeds City Council and express their view on Wharves in the Leeds area. Branford Barge Owners family date back carrying cargo over 200 years and have carried freight into Leeds city centre previously in the past. Branford Barge Owners are carrying cargo right now for Lafarge Aggregates and are currently in their fourth year of a Freight facilities grant, moving cargo from the River Trent near Newark to Whitwood Euro port in the Wakefield district, up to 250 thousand tonnes per annum are moved by water. Therefore the environmental impact is self evident; 	<p>Support welcomed.</p>	

			<ul style="list-style-type: none"> • Wharfs must be safeguarded on canal sides for water freight to take place. We are all aware that roads and motorways are getting more congested; water freight is a viable alternative. • Canals cannot operate without wharves commercially. We feel wharfs in the Leeds area are crucial to safeguard water freight movement. 		
14	Jonathon Branford	Branford Barge Owners	<ul style="list-style-type: none"> • I work for my family business as a captain on a 500 tonne barge, I hope to make this a life long career, I am currently 28 years old and have been working for the business since I was 16. In the past I have brought cargo into Leeds using the Goodman Street Wharf. I hope in the future to be able to use Wharves again commercially in the Leeds area. It is essential that Wharves are safeguarded to be used for commercial use. 	Support welcomed. Important for LCC to be aware that there is demand to use the canal for freight.	Add info. to evidence base.
15	Alison Branford	Branford Barge Owners	<ul style="list-style-type: none"> • I write this e-mail to show my support for the safeguarding of wharves in the Leeds area. I currently work as a primary school teacher in the North Yorkshire area. However I was born into a family of Barge Owners. My father and brother both currently work on the rivers and inland waterways within the Yorkshire and Lincolnshire area. • It would be a great shame if the canals are only been used by pleasure craft and the opportunity for commercial use is lost. Safeguarding of wharves does have sound economic as well as environmental benefits for the long term. Leeds needs to be a forward thinking city planning for the future. 	Support welcomed.	
16	Peter Hugman	BargeConsult	<ul style="list-style-type: none"> • Current proposals indicate the upsurge in the interest in using the Aire & Calder for transporting freight to and from Leeds. The decision to protect the wharves/areas indicated is a huge step forward to ensuring that this can go ahead. In the 2009 Site Selection Study Update for Waste Solution Programme dated 2009, the possibility of accessing the identified sites at Skelton Grange and Knostrop (sites 18,19 + 21) by barge is excluded as a possibility. I believe that this is due to the short distance used for access to a wharf at only 250m (page 57). Current work I am carrying out would indicate that this should be at least 100m and would significantly improve the scoring of these sites especially with an improved Skelton Grange Bridge. 	Support welcomed.	

			<ul style="list-style-type: none"> • My business has been involved in Inland Waterways transport in the Yorkshire area for nearly 30 years and recently we have spent a significant amount of effort identifying wharves that are still useable for commercial purposes. • Most commercial wharves are well over 100m long and I would suggest that the economic area associated with a wharf is at least 1000m rather than the 250m identified by your consultants. • I am currently involved with two projects to restart flows into the Stourton area of Leeds. One, the subject of a recent successful trial is, I believe, at the point of significant investment with the second not far behind. • I and my clients are fully behind your plan to 'protect' the wharves specified and would hope that other planning departments will take note of this action and follow your lead. • The loss of the last remaining canal side wharves in the Leeds area would affect the modal choice for transport over a long period. A wharf can unfortunately be sold for development fairly easily, but building a wharf from scratch is a very costly and time consuming process (starting at £3m). 	Important for LCC to be aware that there is demand to use the canal for freight.	Add info. to evidence base.
17	Graham Whorton	Birmingham Canal Navigations Society	<ul style="list-style-type: none"> • I am writing in support of the initiative to safeguard the railway sidings and canal side wharves in Leeds as written into the Leeds Natural Resources and Waste Local Development Framework proposals. Aggregates, waste and other bulk cargoes are well suited to be carried by water and I hope that Leeds will see the benefit from the use of 700 tonne barges on the Aire & Calder Navigation to cut down on road haulage, reduce carbon emissions and traffic congestion and will follow London's success in re-opening safeguarded wharves. 	Support welcomed.	

18	Peter Morris	Centro	<ul style="list-style-type: none"> • I am writing in support of the need for retention of wharfage and any associated rail sidings on the Aire and Calder Navigation. Use of water and rail for freight has important long term implications for the 'green' agenda, as well as immediate benefits for those living along any trunk routes that would suffer avoidable, additional heavy lorry mileages were the ability to use water for bulk loads to be lost. • I hope Leeds will be able to follow the successful example of London in re-opening previously safeguarded wharves - the 'halo' effect of this for both the Olympics and the City of London is plain for all the world to see. 	Support welcomed.	
19	Edward G Hunt	N/A	<ul style="list-style-type: none"> • It is far better to carry 700 tons of aggregates or waste by barge on the Aire & Calder Navigation than in 35 trucks. Too many wharves all over the country have have been lost due to the greed of developers. • As a member of the Inland Waterways Association I am a supporter of transport on Inland Waterways. 	Support welcomed.	
20	A E Waddington	Ernest V Waddington Ltd	<ul style="list-style-type: none"> • We are writing to say we agree with the safeguarding of railway sidings and wharves for the transportation of minerals and/or waste. Without wharves the navigation is a route to nowhere. Like a motorway with no exits. 	Support welcomed.	
21	C B Holmes	Thursday's Child at Stoke Golding	<ul style="list-style-type: none"> • Write in support of the Commercial Boat Operators Association, being in favour of canal and river wharves not to be used for building. <p>The wharves in Leeds on the Aire & Calder Navigation are a part of our nations heritage. They were built for the purpose of loading and off-loading goods and can still be used today and in the future if no other development takes place. The wharves need to be protected from development and wherever possible, following the example of London, used for transporting materials.</p>	Support welcomed.	

22	Ian Smith	English Heritage Y&H	<ul style="list-style-type: none"> We broadly support the Vision for this particular DPD especially the fourth bullet-point relating to a high level of environmental protection.. It is not clear why this particular set of UDP Saved Policies have been selected whilst others, which seem to be of equal relevance to the consideration of the issues within this DPD, have been excluded. 	Support welcomed. LCC intends to review all the UDP Saved policies and the relevant ones will be incorporated into this DPD.	Review Saved UDP policies and incorporate relevant ones into the DPD.
23	Eric J Ruff	N/A	<ul style="list-style-type: none"> Although I clearly do not live in Leeds I, along with my wife, visited Leeds last May. In fact we visited twice. The first time we arrived by canal but due to our schedule were not able to stay long. We were impressed by the canal and its potential as a tourist attraction. As we liked what we saw we decided to visit Leeds after our boat trip and so spent a couple of days sightseeing in your lovely city. We liked it very much and would encourage others to visit Leeds. <p>I certainly support the retention of wharves as areas for handling cargo carried by water. It's really quite obvious, or should be obvious, to all that water transportation is cheaper and more efficient, as well as being 'greener', than road transportation. I foresee a move towards increased water transportation for bulk items in the not-too-distant future and to safeguard that I firmly believe that wharves should be protected. Once the land is used for housing, high-rise flats, shops, etc. it will be very difficult to convert it back into wharves.</p>	Support welcomed.	
25	Richard Kendall	Hull & Humber Chamber of Commerce, Industry & Shipping	<ul style="list-style-type: none"> In response to the consultation on the above document, we would like to express our support for safeguarding wharves and railway sidings which could be used for the transportation of minerals and waste materials. Companies in our area may be interested in using these facilities more in the future, so we feel it is important that they are protected for these uses. 	Support welcomed. Important to note that other companies in the area may be interested in using the Canal.	Consider surveying other companies to ascertain likelihood of use of the Canal by them.
27	David Lowe	The Airedale Barge Co Ltd	<ul style="list-style-type: none"> I am writing to strongly support the proposals to safeguard various wharves and waterside land in Leeds for the purpose of encouraging movement of waste and aggregates (and other freight) by water. <p>There is no point in trying to adopt the Government's objective of getting freight off road and on to water (and rail)</p>	Support welcomed.	

			<p>if there are no wharves or sidings to handle the traffic</p> <p>It is gratifying that Leeds City Council is 'leading the way' (outside of London) in this respect and hopefully others will follow.</p>		
30	John Dodwell	Commercial Boat Operators Association	<ul style="list-style-type: none"> • This document is in response to the above consultation. It is submitted by the Commercial Boat Operators Association (CBOA) which is the trade association representing firms which carry cargo and provide engineering services on Britain's inland waterways. We have 100 members, including associates. • 2. Our answer to the consultation question no 4 "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?" is Yes. • 3. Our answer to the consultation question no 16 "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?" is Yes as the location of two of them would facilitate the use of water freight. • 4. In answer to the consultation question no 17 "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?", we reply Yes as to Cross Green and express no view about the other four. However, we are puzzled that the whole of the Cross Green Industrial Park has not been included. We recognise that part of the Park is not used for waste/mineral activities but this situation may change. • 5. We observe that only two wharves have been listed and suggest that others be added. • 6. We think it is very important to look at the ownership and 	<p>Support welcomed.</p> <p>It is not the intention to import waste from other authorities.</p> <p>It is important to make provision for other industrial uses besides minerals and waste and therefore we have not identified the whole of the Cross Green Industrial area for waste.</p> <p>Agree.</p> <p>An important role of the</p>	<p>Identify other appropriate wharf sites and safeguard accordingly.</p>

			<p>wharves and potential wharves for safeguarding. The experience of the Mayor of London, Transport for London, the London Development Agency and the Port of London Authority (the navigation authority) with their 50 safeguarded Thameside wharves is that land ownership is crucial to the success of wharf safeguarding and their use as wharves. Such use has been frustrated by property companies wishing to build homes or offices there and denying the use of the wharves to potential wharf users. In two such cases, this impasse has eventually been resolved by threatening to use compulsory purchase powers; as a result, the property companies have sold the land at wharf prices, not housing values. We note that about 50% of all the aggregates used in construction in London arrive in London by water freight.</p> <ul style="list-style-type: none"> • 7. We are therefore pleased to see the wharf at Old Mill Lane, Hunslet on the list. This is owned by British Waterways (albeit that part is leased out at present). They can be presumed (or pressure can be put on them) to be supportive of wharf uses. • 8. However, the Stourton wharf on the list is owned by a property company and we understand that their long term wishes for the site relate to housing. Although they have granted a short term lease to the present occupier, proper investment in wharves needs longer length security of tenure. • 9. If for this reason only, we recommend that the British Waterways owned land in Skelton Grange Road be added to the list. Although works would need to be carried out to the land to make it a usable wharf, the fact that it is owned by British Waterways means there is a greater likelihood of it being used for water freight. The wharf area could have good road access to Pontefract Road. In any event, the wharf's status needs clarifying as it is already designated as a wharf. • 10. Other parts of the document show the location of asphalt/concrete plants, including five in Cross Green where there is also a large metal recycling plant (EMR) and a 	<p>planning system is to protect land in the public interest. We would therefore encourage owners of the safeguarded wharf sites to work with us in protecting sites for this purpose. CPO powers are available to use for this purpose but we would wish to come to an agreement on this issue rather than have to use CPO.</p> <p>British Waterways have confirmed their support for canal freight.</p> <p>There has been no objection to the proposed safeguarding of the Stourton Wharf from the land owner. The area is not suitable for housing development as it is largely industrial.</p> <p>Agree this wharf should be safeguarded.</p> <p>Agree this wharf should be safeguarded.</p>	<p>Safeguard wharf.</p>
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			<p>timber shredding plant. This area is very close to the Navigation where there is what is known as the Total Oil wharf. This is just opposite the Knostrop Lock and mooring bollards and lighting can be seen – see attached photo. Although the wharf by itself has no immediate hinterland, we consider that is a very good case for examining the use of this wharf in conjunction with the Cross Green users – for both incoming and outgoing goods. We are aware of the dismantled railway that runs between Cross Green and the Navigation; we consider this can be dealt with by building a tunnel through the embankment or by cutting a path in the embankment and building a footbridge over the gap.</p> <ul style="list-style-type: none"> • 11. We therefore recommend that the Total Oil wharf be considered for inclusion on the list. • 12. We are surprised to see the Hanson Cross Green asphalt plant site (document reference no 22) among those not to be safeguarded. We also note that the aggregate recycling site in Bridgewater road, Cross Green (document reference no 186) being excluded. Both of these are close to the Total Oil wharf. We recommend that these suggestions of exclusion be reviewed. • 13. When Skelton Grange Power Station was in use, it received coal by water with the unloading equipment straddling the River itself from the barges in the Navigation. The wharf is still there. In view of the proposals in Map E that the Power Station site be a strategic waste site, we recommend that Skelton Grange Wharf on the Aire and Calder Navigation be added to the list. Whilst we can see that original waste would largely arrive by road from various parts of the city, there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge. We already know of waterside firms elsewhere in Yorkshire wishing to receive Leeds’ domestic residual waste and shredded timber/wood pellets by barge. • 14. In view of their proximity to the Navigation, we support the proposals that the Stocks and Bison sites in Stourton be 	<p>Agree this wharf should be safeguarded.</p> <p>Agree that we should review the potential for safeguarding this wharf. The site is a housing allocation in the UDP. At that time it was expected that the industrial nature of the area would change with the decline of the traditional industries, however this has not happened and the area remains heavily industrial. Housing may no longer be the most appropriate allocation for this site.</p> <p>Agree.</p> <p>Support welcomed.</p>	<p>Safeguard wharf.</p> <p>Safeguard wharf.</p> <p>Review UDP housing allocation. Potentially safeguard wharf.</p> <p>Add Skelton Grange Wharf to the list of protected wharves.</p>
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		<p>earmarked for waste and aggregate recycling.</p> <ul style="list-style-type: none"> • 15. It is sometimes said that wharves have no place in city centres. This is thought to be based on the concept that there is no point in bringing goods by barge into city centres if the goods are then transferred to lorries for distribution out of the city centre. Whilst this is true for e.g. containers, in the context of aggregates and waste the statement completely overlooks the fact that aggregates are needed in city centres for construction whilst waste originates within towns and cities and the question is how to get it out. • 16. We are aware that waterside housing has its attractions – although we understand that in the Stourton wharf case, some £200m of public money would have to be spent in clearing up contamination. Homes. We observe that housing does not need to be by the waterside – wharves do; and that wharves do not need de-contamination to anything like the same extent. • 17. We also point out that a freight waterway without wharves is like a motorway without exits – not much use! • 18. We also point out that the whole Plan complies with the following planning policy guidelines <ul style="list-style-type: none"> a. PPG 13 Planning Policy Guideline 13 – Transport – states that “Land use planning has a key role in delivering the Government’s integrated transport policy” b. PPG 13 also said that local authorities should identify and, where appropriate, protect wharves for freight use, including the re-opening of disused wharves. c. This was supported by PPG 11/PPS11 – regional planning; PPG 12 – development plans; PPG 10 – planning and waste management. d. More specifically, the following paragraphs apply <ul style="list-style-type: none"> i. PPG13 (Transport) para 45, requiring local authorities to 	<p>Comments noted.</p> <p>Comments noted.</p> <p>Support welcomed, acknowledgment of compliance with national policy.</p>	
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		<p>protect wharves etc from detrimental development. Annex B para 10 refers to local authorities aiming to promote the role of wharves.</p> <p>ii. PPG 11 (Regional Planning) para 6.3 refers to Regional Transport Strategies providing a strategic steer on the role and future development of inland waterways consistent with national policy. Annex B Para 25 refers to involving freight operators and others and says that in doing so the local authority should look at the siting of links to inland waterways and “it should help to promote the carriage of freight by rail and water”.</p> <p>iii. PPG 10 (Planning and Waste Management) paragraph A10 refers to waste transfer sites being sited so their output can be transferred to water to go to final disposal. Paragraph A 14 reminds local authorities that there may be significant environmental and economic advantages when water transport can be used instead of road vehicles. Paragraph A 51 refers to numerous factors which can influence the location of new waste facilities, such as the availability of water transport.</p> <p>iv. PPG 12 (Development Plans) para 5.16 requires development plans to include proposals for the development of ports and harbours. DfT guidance on Local Transport Plans lists one of the criteria as being “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”. Table 27 on sustainable distribution gives some minimum requirements, such as “evidence that the strategic role for freight distribution for growth in the local economy has been assessed”; “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”.</p> <p>v. PPG 4 (Industrial, Commercial Development and Small Firms), paras 10, 11 and 12 clearly encourages the allocation of waterside sites to those businesses which can benefit from access to the water – retail is given as an example which does not benefit from waterside access.</p>	<p>We have not specifically sought to transfer waste by water however this is an important point and merits further examination.</p> <p>Support welcomed.</p> <p>Advice noted.</p>	<p>Identify if there is potential for water based movement of waste to and from waste transfer sites.</p>
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			<p>vi.PPG 3 (Housing) para 42 refers to the release of waterside industrial sites for housing inhibiting the use of water freight.</p> <p>vii. PPG 24 (Planning and Noise) refers to the need to ensure that wharves are protected against noise sensitive developments being too close to a working wharf.</p> <p>e. Underlying these policies is the concept that wharves should be protected from unsuitable development – whether on the site or too close near by – and that opportunities for expansion should be encouraged.</p>	Advice noted.	
31	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<ul style="list-style-type: none"> • Preferred Policy Position - Land 1: Reducing Landtake (Page 9) In general, the preferred policy position is supported. However (as alluded to elsewhere in this part of the plan) it is considered that the use of previously developed land should be prioritised for all waste development, not just for 'co-located' and 'compatible' waste activities, as seems to be the inference in the preferred policy position statement. • Preferred Policy Position - Land 2: Contaminated Land (Page 10) It is considered that the preferred policy position, which is to support the redevelopment of sites only where there is 'proven' contamination, does not reflect the general discussion in the supporting paragraphs - which is to encourage development on all previously developed/ brownfield land (only some of which may have 'proven' contamination). The Council should therefore amend the policy to provide more broad support for development on brownfield land where there may be the potential for contamination or a history of potentially contaminating uses. Also, the need for 'financial assessment' and 'planning obligations' should arguably not be stated within the policy since these may not be required in every case. • Preferred Policy Position - Land 3: Urban Tree Planting (Page 10) 	<p>The intention of the policy is to prioritise remediation of contaminated land over other planning obligations.</p> <p>Respondent has misunderstood the intention of the Policy, this is because the Policy is not very clear.</p>	<p>Policy needs to be clarified.</p> <p>Policy needs to be clarified.</p>

			<p>In general, the preferred policy position is supported. However, where it states: “and a provision for all planning applications to resist healthy tree/vegetation loss”, it should be recognised that in some cases it may not be possible to avoid the loss of some trees/ vegetation and in such cases suitable compensatory measures may be sought.</p> <ul style="list-style-type: none"> Preferred Policy Position - Land 4: NRWDPD Transport Modes (Page 11) Whilst the intention behind the preferred policy position is understood, it should be recognised that, just because a site can be accessed by means other than road (e.g. via rail sidings and wharves), it does not necessarily mean that the site is suitable for waste development. It is questionable therefore whether the policy should state that the Council will provide ‘support in principle’ for development on such sites. The policy should instead recognise the importance of seeking sustainable transport opportunities and where a site is both suitable for waste management uses and potentially capable of being served by alternative transport modes that the council will seek to encourage this wherever practical and viable and ensure that potential future linkages are safeguarded. 	<p>Point noted.</p> <p>LCC is considering widening out the freight safeguarding from just waste and minerals freight to all freight. This would then include those wharves that have potential for bringing steel in and out.</p>	<p>Consider respondent’s suggestion. Consider if unavoidable tree loss should require a replacement of two trees for every one.</p> <p>Extend safeguarding of waste and minerals canal and rail freight sites to all canal and rail freight sites.</p>
34	Peter H Boyce	Commercial Boat Operators Association	<ul style="list-style-type: none"> As an operator of commercial cargo boats on the inland waterways, I find it imperative that no further wharfage is lost to redevelopment. Finding that suitable sites for loading cargo have been lost is frustrating and hinders our business. We operate on green principles, and seek to reduce the carbon footprint of our transport by the use of the inland waterways. This use will grow in the future as more cargoes are moved to water transport. The River Aire to Leeds is a major player in the low carbon transport system, and is an asset for the future. It requires its wharves to be secured as traffic increases. Therefore I ask you to retain the precious wharfage assets along the waterways in Leeds, and reject planning applications which will change their use as wharves. 	Support welcomed.	

36	Dr Kevin Grady	Leeds Civic Trust	<ul style="list-style-type: none"> The LCT will support all these objectives but they should be more specific and challenging, making real commitments to change. (Land 3) The LCT has campaigned for additional tree planting throughout the city and the better maintenance/replacement of existing trees – it thus supports this policy. However, there are conflicts with other policies eg the A65 Quality Bus Initiative and NGT could lead to the loss of many trees. The policy should be extended to require the replacement of existing trees by new specimens (and not by small trees!) on a two for one basis as a minimum. (Land 4) The LCT supports the policy to move waste and minerals to water/rail transport with the consequent need to preserve appropriate wharves/sidings. This could impact on existing consents in Hunslet where a wharf has permission for residential development which, while in itself is of high quality, would sterilise an existing minerals wharf. It appears as if this site and others in the area are not safeguarded. Should there be a review of consents given the change in the market and the Eco-Settlement plans for the Lower Aire Valley? 	<p>Support welcomed. The consultation process has brought to light a number of wharves that we were previously unaware of that can also be safeguarded.</p> <p>Agree. NGT is involving some tree losses which are being replaced on a two for one basis.</p> <p>The wharf in question was not proposed to be safeguarded because it is allocated for housing in the Leeds UDP. However this consultation has brought forward very strong support and encouragement for protecting wharves, including from the tenants of the site in question. It would seem appropriate therefore to review the housing allocation to ascertain if it is still the most appropriate use or if it should in fact be safeguarded.</p>	<p>Safeguard additional wharves.</p> <p>Consider including a two for one replacement tree policy.</p> <p>Review UDP housing allocation. Potentially safeguard wharf.</p>
39	Alan Jones	N/A	<ul style="list-style-type: none"> I have been alarmed and frustrated in recent years by the closing of potentially useful wharves alongside our navigable waterways to enable them to be developed for residential or non-navigation purposes. I understand that there is a similar proposal for wharves in Leeds and I object to it. Navigations to Leeds are perfectly viable and modern and it would be environmentally quite wrong to lose their potential for waterborn commerce. 	<p>Support for safeguarding canal wharves welcomed. This DPD does not propose to close any wharves but instead seeks to protect them. There is however , a proposal in the Aire Valley Area Action Plan for housing on a wharf site.</p>	<p>Refer objection to the Aire Valley Area Action Plan Team.</p>
41	James A Walker	N/A	<ul style="list-style-type: none"> I am writing in support of your proposal to safeguard canal/river wharves for future use. <p>It is very much to the credit of Leeds City Council that such a proposal has been made. I have no doubt that many local</p>	<p>Support welcomed.</p>	

			<p>authorities will eventually be highly criticized for failing to anticipate the future need of safe and efficient bulk transport especially to city centres.</p> <p>The use of wharf land for building is short sighted and fails to take any account of the environmental benefits of water transport. As the demands for greenhouse gases reduction become more acute so will the needs grow to make good use of all energy efficient methods of manufacturing and transport.</p> <p>The benefits of water transport, where up to 700 tons of cargo can be delivered to or from city centres are immeasurable. Businesses using bulk materials should be actively encouraged to occupy sites adjacent to canals or rivers and to maximise their use of waterway transport.</p>	Agree with comments.	
42	D G Cox	ASD Metal Services	<p>Strong support for the safeguarding of railway sidings and canal wharves. Want to transport steel profiles and sections by water. Have trialled transporting steel by water from their existing site at Stourton Point and it was extremely successful. Found that one barge replaced the need for 24 articulated heavy goods vehicles. They currently transport 60,000 tonnes of steel per year on Leeds roads which could all go on the water. Their barge has a low emission engine. Also want to transport 'used' wood material for recycling on the canal out to the Humber Ports rather than sending to landfill as currently happens. Cannot do any of this without investing and a serious disincentive to investing is the proposal for the wharf for housing in the Aire Valley Area Action Plan.</p>	<p>Support welcomed. Comments on Aire Valley Area Action Plan noted.</p> <p>It is important for LCC to know that there is this demand for using the wharves. Important to know how much traffic can potentially be diverted from roads to the canal.</p>	<p>Objection to the Aire Valley Area Action Plan to be referred to the Aire Valley Area Action Plan Team. Need to ensure consistency between Aire Valley AAP and Natural Resources and Waste DPD.</p> <p>Add info. to evidence base</p>
43	Michael A Constable	N/A	<ul style="list-style-type: none"> I understand that the consultation period for this proposal is about to come to an end. As a frequent visitor to Leeds, previously for business purposes, but now for family reasons, I must say that I whole heartedly support the idea of not only preserving the few remaining Wharves on the River, but making active use of them. I am able to remember the old Leeds Wharves with the Co-Op coal fleet much in evidence, and then more recently the fuel barges lying below the Lock by what is now the Royal Armouries. Unfortunately though on my recent visits I did not see any commercial traffic on the Navigation at all and felt that it was 	Support welcomed.	

			<p>a great pity. Given the horrific road congestion which our bus encountered the last time we visited there is a clear need for trying to relieve the roads by reintroducing both rail and water trade to the City and this proposal is a step in the correct direction. I can only hope that it is followed up with even more sensible proposals to seek out other bulk cargoes which could travel from the Ports to the City as well as the removal of waste and the bringing in of aggregate.</p> <p>Large river navigations like this can play a major role in the commercial success of a City and I hope Leeds City Council will grasp this opportunity now, before it is too late. Whilst housing developments alongside water may bring in short term revenue, they also bring with them serious problems in terms of traffic congestion and also have deleterious effects on the drainage, which can lead to flooding and infrastructure failure. Without suitable wharves to operate to and from, the Navigation will die as there is not enough pleasure boat traffic to justify its existence as much more than a drain.</p>	LCC is considering widening out the freight safeguarding from just waste and minerals freight to all freight.	Extend safeguarding of waste and minerals canal and rail freight sites to all canal and rail freight sites.
44	Gerald J F Heward	Wood Hall & Heward Limited	<ul style="list-style-type: none"> 1. This document is in response to the above consultation. It is submitted by Wood, Hall & Heward Ltd, a London based canal workboat and barge operating company. Although London based our barges work all over the UK and we currently have 3 tugs and 5 barges working on the Leeds & Liverpool Canal. A major barrier we encounter to the greater use of our inland waterways is lack of access to the canal and suitable loading and unloading facilities. Against this background we made the following responses to the consultation. 2. Our response to the consultation question No. 4 "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?" is Yes. 3. Our response to the consultation question No. 16 "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?" is Yes as the location of two of them 	<p>Support welcomed.</p> <p>Important for LCC to be aware that there is demand to use the canal for freight.</p> <p>Support welcomed.</p> <p>Support welcomed.</p>	Add info. to evidence base.

			<p>would facilitate the use of water freight.</p> <ul style="list-style-type: none"> 4. Our response to the consultation question No. 17 “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?” is Yes to Cross Green. 5. We are pleased to see the wharf at Old Mill Lane, Hunslet on the list. This is owned by British Waterways and a working wharf here would support BWs efforts to increase freight transport on BWs canals. 6. We would suggest that the British Waterways owned land in Skelton Grange Road should be added to the list. Although work would need to be carried out to make it a usable wharf, the fact that it is owned by British Waterways means there is a greater likelihood of it being used for water freight. The wharf area could have good road access to Pontefract Road. 7. Other parts of the document show the location of asphalt/concrete plants, including five in Cross Green where there is also a large metal recycling plant (EMR) and a timber shredding plant. This area is very close to the Navigation where there is the Total Oil wharf. Although the wharf by itself has no immediate hinterland, we consider there is a very good case for examining the use of this wharf in conjunction with the Cross Green users – for both incoming and outgoing goods. 8. We would therefore suggest that the Total Oil wharf be considered for inclusion on the list. 9. We are disappointed to see the Hanson Cross Green asphalt plant site (document reference no 22) among those not to be safeguarded. We also note that the aggregate recycling site in Bridgewater road, Cross Green (document reference no 186) being excluded. Both of these are close to the Total Oil wharf. We suggest that these exclusions be reviewed. 	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree that we should review the potential for safeguarding this wharf. The site is a housing allocation in the UDP. At that time it was expected that the industrial nature of the area would change with the decline of the traditional</p>	<p>Safeguard wharf.</p> <p>Safeguard wharf.</p> <p>Safeguard wharf.</p> <p>Review UDP housing allocation. Potentially safeguard wharf.</p>
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		<ul style="list-style-type: none"> • 10. When Skelton Grange Power Station was in use coal was delivered by water and the wharf is still in existence. In view of the proposals in Map E that the Power Station site be a strategic waste site, we suggest that Skelton Grange Wharf on the Aire and Calder Navigation be added to the list. Whilst we can see that original waste would largely arrive by road from various parts of the city, there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge. • 11. In view of their proximity to the Navigation, we support the proposals that the Stocks and Bison sites in Stourton be earmarked for waste and aggregate recycling. • 12. We are concerned that many towns and cities have lost access to the canal through residential and office development. If we are to reduce the ever increasing demand for more road transport we must ensure access to water and rail transport in order to exploit those transport options. • 13. We also observe that the whole Plan complies with the following planning policy guidelines <ul style="list-style-type: none"> a. PPG 13 Planning Policy Guideline 13 – Transport – states that “Land use planning has a key role in delivering the Government’s integrated transport policy” b. PPG 13 also said that local authorities should identify and, where appropriate, protect wharves for freight use, including the re-opening of disused wharves. c. This was supported by PPG 11/PPS11 – regional planning; PPG 12 – development plans; PPG 10 – planning and waste management. d. More specifically, the following paragraphs apply <ul style="list-style-type: none"> i. PPG13 (Transport) para 45, requiring local authorities to protect wharves etc from detrimental development. Annex B para 10 refers to local authorities aiming to promote the role of wharves. ii. PPG 11 (Regional Planning) para 6.3 refers to 	<p>industries, however this has not happened and the area remains heavily industrial. Housing may no longer be the most appropriate allocation for this site.</p> <p>Agree</p> <p>Support welcomed.</p> <p>Advice noted.</p>	<p>Safeguard wharf.</p>
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			<p>Regional Transport Strategies providing a strategic steer on the role and future development of inland waterways consistent with national policy. Annex B Para 25 refers to involving freight operators and others and says that in doing so the local authority should look at the siting of links to inland waterways and “it should help to promote the carriage of freight by rail and water”.</p> <p>iii. PPG 10 (Planning and Waste Management) paragraph A10 refers to waste transfer sites being sited so their output can be transferred to water to go to final disposal. Paragraph A 14 reminds local authorities that there may be significant environmental and economic advantages when water transport can be used instead of road vehicles. Paragraph A 51 refers to numerous factors which can influence the location of new waste facilities, such as the availability of water transport.</p> <p>iv. PPG 12 (Development Plans) para 5.16 requires development plans to include proposals for the development of ports and harbours. DfT guidance on Local Transport Plans lists one of the criteria as being “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”. Table 27 on sustainable distribution gives some minimum requirements, such as “evidence that the strategic role for freight distribution for growth in the local economy has been assessed”; “evidence that opportunities for the greater use of water freight are being taken into account in land use planning decisions”.</p> <p>v. PPG 4 (Industrial, Commercial Development and Small Firms), paras 10, 11 and 12 clearly encourages the allocation of waterside sites to those businesses which can benefit from access to the water – retail is given as an example which does not benefit from waterside access.</p>	<p>Advice noted.</p> <p>Advice noted.</p>	
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			<ul style="list-style-type: none"> vi. PPG 3 (Housing) para 42 refers to the release of waterside industrial sites for housing inhibiting the use of water freight. vii. PPG 24 (Planning and Noise) refers to the need to ensure that wharves are protected against noise sensitive developments being too close to a working wharf. <ul style="list-style-type: none"> e. Underlying these policies is the concept that wharves should be protected from unsuitable development – whether on the site or too close nearby – and that opportunities for expansion should be encouraged. 		
45	Rachel Wigginton	GOYH	<ul style="list-style-type: none"> • The policies in this section need to be more specific. They are written as objectives rather than spatial policies. Otherwise you need to consider whether they are necessary. • Saved policies N31 and N52 should be replaced in this DPD if they are still appropriate. 	The policies in this section refer to a large number of sites which are shown in the mapbook, they are too numerous to mention individually. Agree.	Incorporate relevant Saved UDP policies.
46	Angela Flowers	North Yorkshire County Council	<ul style="list-style-type: none"> • It is felt that whilst Land 2: Contaminated Land refers to economic impact arising from land restoration it could also note environmental impacts which are also a key consideration. 	Comments noted.	
47	A A Phillips	N/A	<ul style="list-style-type: none"> • I understand that there is a proposal to safeguard river and canal wharves in Leeds for use in connection with transportation of goods by barge. I wholeheartedly support this intention. There is an urgent need to move as much cargo as possible around this country by water transport, which can be more economical and certainly is more environmentally friendly. The sight of commercial vessels loading, unloading and travelling is also an attraction in its own right. I encourage you to adopt this proposal. • I write from Birmingham, where lack of a viable commercial water transport system is a major factor in the demise of industry in the Midlands. 	Support welcomed. Support for the approach in Leeds is welcomed.	
	Martyn Coy	British Waterways	<ul style="list-style-type: none"> • As the authority responsible for the operation and maintenance of the Aire & Calder Navigation and Leeds & 		

			<p>Liverpool Canal;</p> <ul style="list-style-type: none"> • In the light of British Waterways' statutory duties as a navigation authority and its statutory duties under the British Waterways Act 1995 to protect and safeguard the heritage, natural environment and landscape character of waterways and to encourage public access to and recreation use of the navigable waterways; • As a statutory consultee for planning applications within 150 metres of our waterways; • In the light of British Waterways' track record in regeneration delivery and the Government requirement for British Waterways to promote and secure the waterways as a catalyst for urban regeneration; • In the context of the DETR publication "Waterways for Tomorrow" (June 2000), in which the Government clearly states its commitment to increasing the economic and social benefits offered by the waterways. Apart from their traditional role as a system that supported waterborne freight and passenger transport, waterways serve a variety of functions including acting as an agent of or catalyst for regeneration in urban and rural areas; water management resource (water supply, transfer, and drainage); tourism, cultural, sport, leisure, educational and recreation resource; as well as heritage, landscape, open space and ecological resource. The government makes reference to increasing the benefits offered by the waterways by supporting the development of the inland waterways through the planning system. • Policy Land 4: NRWDPD Transport Modes Policy T4 of the Yorkshire and Humber Regional Spatial Strategy (RSS) calls for plans and strategies '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'. However, whilst proposed Policy Land 4 aims to safeguard 	<p>Comments noted.</p>	
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			<p>wharves, 'where possible', it relates to their use for natural resource and waste activities only. Such a narrow focus would reduce the opportunity for other forms of waterborne freight transportation on the waterway; and that is other forms of waterborne freight that might readily fit with wider aims of waterside regeneration as set out in the emerging Aire Valley Leeds Area Action Plan. In this regard, the policy should address waterborne freight in general of which minerals and waste is only one element. Indeed, the two sites that are identified on the Policy Position Map are currently general employment sites, with one handling construction steel as opposed to raw minerals.</p>	<p>Agree that the Policy should support water-borne freight in general. LCC intends to extend the policy to cover other types of water freight and not just waste and minerals.</p>	<p>Extend safeguarding of waste and minerals canal and rail freight sites to all canal and rail freight sites</p>
54	Mike Brown	N/A	<ul style="list-style-type: none"> It has surprised me over the years about how little the powers that be in Leeds know about the fantastic canal infrastructure at their disposal and how absurd it is that it is totally unused at a time when the traffic congestion in and around Leeds is getting worse every day. <p>I think it is worth pointing out that the stretch of the Aire and Calder Navigation between Knostrop Flood Lock and Knostrop Lock known as the Knostrop Cut was developed in 1959 with purpose built warehousing and barge handling facilities and has been criminally under used since the late 1960's.</p> <p>It was built and designed for larger barges and the location of this area of the canal is perfect with the network of newly built roads surrounding the canal to almost develop a canal zone, this concept is very successful in European cities such as Brussels. Knostrop depot is still intact, it perhaps needs a little investment, but the wharf is still there with good storage and covered areas, overhead covered unloading facilities and located in a safe area where it would not effect other users such as cyclists and walkers etc. Leeds would be capable of handling 600 tonne barges, with direct access for export via the port of Goole or onwards to any of the Humber ports, also direct links via the Aire and Calder Navigation to other towns and cities in Yorkshire or even to Nottingham via the River Trent.</p> <p>Just off the centre of Brussels lies a very similar canal to the</p>	<p>Agree</p> <p>Agree</p> <p>Important evidence for this DPD.</p>	<p>Safeguard wharf.</p> <p>Add info. to evidence base.</p>

		<p>Aire and Calder Navigation, it is a little bit larger and can accomodate larger barges, but a special zone for the canal has been successfully developed with modern handling facilities and various bulk cargoes such as aggregates, waste, oil and petrol products slip in and out of the city unnoticed as they could and have done easily in Leeds too; but yet carrying up to 30-40 lorry loads which if people were made aware, would be very attractive proposition!</p> <p>The section of the Aire and Calder Navigation below Knostrop Lock and beyond Skelton Grange Power Station Bridge is another prime area to further develop barge handling facilities the access to the motorways is even better here, ADS Metals had a successful trial delivery of 2000 tonnes of steel in 2008, if they could be supported on their site which is again canalside, they would be encouraged to invest in a barge served terminal in and out of Leeds.</p> <p>It seems to be a bit of a myth that any barge traffic has been moving on the Aire and Calder Navigation to read recent articles, particularly the one in the evening post last week, it gives totally the wrong impression of canal and never mentions that Leeds did receive serious tonnages until eight years ago . Then three and half thousand tonnes of sand per week was delivered by barge to a wharf off Goodman Street operated by Lafarge Aggregates , before the wharf was moved to Whitwood near Castleford , when two thirds of the sand had to be lorried back to Leeds because it was destined for Bison's in Hunslet ! If operators such as the main dry cargo carrier John Branford had been consulted and guys like myself, John Dodwell , David Lowe, extra lorry miles could have been avoided and new canal work created. The canal was modernised in the late sixties for another fuel based contract to deliver oil products from Salt End Hull to Leeds for Esso, this was discharged near to Clarence Dock by six purpose built 500 barges, it just appears that all the work has been done in the past to upgrade Leeds into a well served canal port , only to let all the work be undone .</p> <p>Goodman Street area below Knostrop Lock had huge oil</p>	<p>Important for LCC to be aware that there is demand to use the canal for freight.</p>	<p>Add info. to evidence base.</p>
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			<p>storage facilities and until 1987 JH Whitaker tanker barges brought over 100000 tonnes per annum of oil products into this corner of Leeds, once again un-noticed.</p> <p>Currently oil products are carried to Fleet storage at Lemonroyd near Woodlesford and aggregates to Whitwood, but LeedS should be the jewel in the crown and an ideal canal served model for the whole of the UK.</p> <p>In my opinion and as do consider myself an expert of the Aire and Calder Navigation, Leeds City Council needs to wake up and not only safeguard the wharves, but also look to overhaul the whole of the Knostrop-Hunslet area and develop an inland port where not hundreds, not thousands, but millions of tonnes could be carried in and out of the city by 600 tonne barges and if the canal was developed to its maximum length and depth, 700 tonne barges could navigate from the Humber ports of Hull and Immingham direct into the heart of Leeds and Yorkshire!</p>	<p>Evidence of demand and need for Policy.</p> <p>Comments noted.</p>	<p>Add info. to evidence base.</p> <p>Review potential for an inland port.</p>
55	Colin Holm	Natural England	<ul style="list-style-type: none"> • Natural England welcomes Preferred Policy Position – Land 1: Reducing Land take. We agree that the policy will help reduce land take and as a consequence we consider that it will reduce potential negative effects on biodiversity and landscapes. Furthermore, the reference to criteria aimed at preventing adverse environmental and social impacts is important. However, the policy should make clear what these criteria are. We would advise that such criteria should include the avoidance or satisfactory mitigation of impacts on landscape, biodiversity, access and impacts on air, soil and water. • Natural England agrees with Preferred Policy Position - Land 3: Urban Tree Planting. We would, however, point to the possibility that some sites that may be earmarked for tree planting may already be significant resources for biodiversity. For instance, alongside some transport corridors there may be significant grassland habitats (such as calcareous grassland in the east of Leeds). Tree planting would diminish such habitats, so we would recommend checking with the local environmental records centre (in Leeds' case, West Yorkshire Ecology) whether any species 	<p>Support welcomed. Agree with comments.</p> <p>Agree. Where tree planting is carried out as part of a development LCC would expect an ecological assessment to have been submitted as part of any application.</p>	<p>Add criteria to Policy.</p> <p>Amend policy to say that tree planting will be encouraged/carried out except where it would have an adverse impact on existing important habitats and species.</p>

			<p>or habitats have been recorded at sites, and making an assessment of the suitability of the land prior to tree planting (e.g. by utilising ecological expertise from within the Council).</p> <ul style="list-style-type: none"> Natural England would be happy to advise further on ways in which this can be achieved. Tree planting should also be consistent with the landscape character of the area. We would advise that an important part of the evidence base for the Local Development Framework as a whole is an up to date landscape character assessment. To ensure that planning applications play their role in increasing tree cover in appropriate places we would advise that supporting text is added to this policy to ensure that ecological and landscape constraints to this policy are adhered to. This will include that appropriate evaluation of site biodiversity and consideration of landscape character is included with proposals. Natural England welcomes 'Preferred Policy Position - Land 4: NRWDPD Transport Modes' which allows for non motorised transport modes to support the development types covered by this DPD. 	<p>As part of the Leeds UDP a comprehensive landscape assessment was completed. Since then the landscape remains largely the same, consequently it is unlikely a comprehensive review is needed. There may be scope, however, subject to resources, to target selected areas for review where or if key changes are apparent.</p>	<p>Review within the context of the preparation of the Core Strategy publication draft.</p>
53	Ian Moore	Inland Waterways Association	<ul style="list-style-type: none"> Re Natural Resources and Waste Development Plan Document Please find attached the Leeds Natural Resources and Waste DPD response form. I am writing on behalf of the West Riding Branch of the Inland Waterways Association in support of the Preferred Policy Position – Land 4: NRWDPD Transport Modes, safeguarding canal wharves. The Inland Waterways Association has over 17,000 members and campaigns for the conservation, use, maintenance, restoration and sensitive development of Britain's canals and river navigations. This includes encouraging water freight. In addition to the 2 wharves identified on Maps B2, we also support safeguarding the other waterside minerals and waste management sites listed in the document, as shown on Maps E and F, as these could also provides scope for future wharfage. 	<p>Support welcomed.</p>	

			<ul style="list-style-type: none"> Also we would like to see the inclusion of the former Hunslet "Total" wharf at Knowsthorpe (close to Knostrop Flood Lock) on land adjacent to Cross Green Industrial Estate, as this would provide wharfage on the north bank of the river which could serve businesses on the industrial estate. Further to the above British Waterways also own land at Stourton off Skelton Grange Road, which was intended for development as a wharf but has not yet been developed. And for this reason and as it is already owned by BW, we would like to see this safeguarded as well. 	Agree	Safeguard Wharf.
58	Mary Keynes	Impact Residents Network	<ul style="list-style-type: none"> We agree with the vision subject to the reservations and suggestions set out below. Please note especially our response to question 2. Development of "previously developed land" designated as "brownfield" should be subject to consultation with residents, as many of our existing green spaces are in fact designated as brownfield although they have been green space within the living memory of most people in the area. Thus newbuild targets set by central government may conflict with the protection of existing green spaces in inner areas such as ours, which should surely be given higher protection to preserve their rarity. This could result in loss of amenity in deprived areas. We strongly support planting trees in the city centre to fill the gaps in its green infrastructure, and we suggest that the emphasis should be on the use of native species and on trees able to resist and adapt to the stresses of climate change. 	<p>The development plan does not designate 'brownfield' sites. All proposed housing and employment allocations, whether on brownfield or greenfield sites will be subject to statutory public consultation. Green spaces which are designated as such in the Leeds UDP will continue to be protected as Saved Policies . In due course, the emerging Leeds LDF will replace these saved policies with a similar protection policy based on evidence gathered during the council's PPG17 study. The Council has carried out a PPG17 audit and this evidence will be used to update the green space planning policies so that any new important greenspaces can also be given protection.</p> <p>Support welcomed.</p>	<p>Include in the text a reference to the need for varieties that are better suited to climate change.</p>

59	Ed Carlisle	Together for Peace	<ul style="list-style-type: none"> • Could we have a special focus on community orchards, ie fruit trees? Get local people involved (even just a few) to plant them etc – and there'll be something nice for the community to enjoy together in a few years time 	Acknowledge importance of community orchards.	Review suggested policy to see if there is any scope for giving encouragement to community orchards.
61	Stuart Beardwell	Leeds Friends of the Earth	<ul style="list-style-type: none"> • 2. Efficient use of previously developed land should allow for redevelopment options of green space and food growing land, and not necessarily just be buildings. Bringing brownfield/contaminated land into reuse should be encouraged, and 'efficient' use should not just look at economic efficiency but also the environmental and social aspects of redevelopment. • 3. This could be strengthened - when development takes place, it shouldn't just resist healthy tree and vegetation loss but actively increase it, not just 'wherever possible' - this should be a requirement. Having a target for increasing the number of fruit and nut trees within the city should also be included in the policy, to allow for increased food availability and community food growing spaces (eg. community orchards). • 4. This should be strengthened to include them being safeguarded for future public transport improvements, as well as mineral/waste transportation. Public transport should be considered as part of the NRWDPD as it fits in with issues or air quality, land use, energy. 	<p>UDP policies require green space provision as part of developments and these policies will be updated and integrated into the Core Strategy and Site Allocations DPD. The PPG17 audit has examined allotment provision and where there are shortages we will need to develop relevant policies to address this.</p> <p>Given the support for the tree planting policy LCC will be looking at how it can be strengthened and improved.</p> <p>Public transport is dealt with in the Core Strategy as it is a strategic issue for Leeds.</p>	<p>Review suggested policy to see if there is any scope for giving encouragement to community orchards and fruit/ nut trees.</p> <p>Cross refer to Core Strategy.</p>
62	Sharon Cox	MDS Transmodal Ltd	<ul style="list-style-type: none"> • MDS Transmodal is a specialist freight transport consultancy that has been involved in various studies over many years concerning the potential for increasing the contribution of inland waterways to the carriage of freight in the UK. Amongst other things, I was co-author of the DfT guidance report "Planning for Freight on Inland Waterways" in which we highlighted the best practice of safeguarding wharves. • In general it is very welcome to see that the planners have put forward suggestions for safeguarding wharves, complying with overarching planning policy guidelines, and I 	Support welcomed.	Add to evidence base.

			<p>fully support that push in development planning because it is essential to safeguard wharves in order to realise the freight potential of the waterways. It is also essential to reserve waterside land.</p> <ul style="list-style-type: none"> • I agree with the two wharves that have been proposed for safeguarding. • I agree with the areas of waterside land to be reserved. The unused wharf owned by British Waterways should remain as a wharf and be included within the plan. 	<p>Support welcomed.</p> <p>Support welcomed. Agree</p>	<p>Safeguard wharf.</p>
65	Mr. Zulfiqar Ali	Environment Agency Y&H	<ul style="list-style-type: none"> • We suggest the following wording be incorporated within your Land Development section to the effect that: <ul style="list-style-type: none"> i) The Environment Agency will object to any proposed landfill site in groundwater Source Protection Zone 1. (ii) For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes and the natural setting and properties of the location. (iii) Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution, the Environment Agency will object to sites: <ul style="list-style-type: none"> • below the water table in any strata where the groundwater provides an important contribution to river flow or other sensitive surface waters; • on or in a Major/Principal Aquifer; • within Source Protection Zones 2 or 3. <p>The area of principal aquifer and most of the source protection zones within the Leeds Metropolitan District Council area is the Magnesian Limestone which is found to the east of the city.</p>	<p>It would be helpful to meet with the Environment Agency to discuss these comments further.</p>	<p>Meet with EA.</p> <p>Add info. to evidence base.</p>
67	Mike Willison	Leeds Local Access Forum	<ul style="list-style-type: none"> • Policy Land 4 - In relation to wharves, every opportunity, where possible should be taken to provide walkways and cycleways. 	<p>Agree in general however where there is a working wharf, it is likely that access for walking and cycling may be restricted due to safety reasons.</p>	<p>Explain in the text.</p>

70	Mr A.Rivero	Network Rail (Property)	<ul style="list-style-type: none"> Although it is logical to suggest existing freight sidings and canal wharves should be safeguarded for possible transfer of material by rail or canal, not all existing facilities are in appropriate locations both in terms of the modern railway network or neighbourhood uses. Many of the remaining yards were designed for service by the horse and cart and do not sit comfortably with either the strategic road network or adjoining developments. In addition they are not all of a size capable of taking the modern type of rail vehicle. As an example, Whitehall Yard (in your document as Holbeck sidings, no.19) – this should be re-named for clarity to the name it is known by in the railway industry (Whitehall Yard) – is very restricted in size (length of siding) and also because of its position it is very difficult to access by rail, given the heavy flow of passenger traffic emanating from Leeds station. Its value as a freight site is therefore very low. <p>In terms of overall freight provision for the city further work has to be carried out in providing a suitable location which is not fettered by exiting capacity and timetabling issues but also is well related to the strategic road network. The potential for freight use at Neville Hill east sidings and Hunslet Riverside is important in this context.</p> <p>You should also be aware that the current UDP identifies Marsh Lane (18) as an important gateway development site, which is supported by NR, and as the yard is again hampered by capacity and size we do not consider it appropriate to safeguard the freight designation.</p> <p>The other two sites identified (Pontefract Road and the Tarmac sidings at Hunslet Riverside) are on long leases for the duration of the DPD and are of an appropriate size and location - therefore we have no objection to their designation.</p> <p>As such we object to policy Land 4 and in particular the designation of the sidings at Marsh Lane and Whitehall yard (Holbeck) for safeguarding.</p>	<p>Leeds has met with Network Rail to discuss in detail the suitability of rail sidings in the Leeds District for freight purposes.</p> <p>Comments noted. LCC acknowledges the need to review the use of the proposed sidings for freight. However we are aware of other sidings that may have more potential and work is on-going to review whether or not these need to be safeguarded.</p> <p>LCC acknowledges that there may be further potential for freight use at Neville Hill. This needs to be reviewed in the light of the need for the facility and its proximity to existing housing.</p> <p>As above.</p> <p>Support welcomed.</p> <p>Objection noted.</p>	<p>Work on-going.</p> <p>Rail sidings to be reviewed. Likely to be changes to the safeguarded sites list.</p> <p>Work on-going.</p> <p>Consider removal of site from safeguarded site list.</p> <p>Consider removal of these two sidings from safeguarded site list.</p>
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			<ul style="list-style-type: none"> • A suggested amended wording of the policy could be: “.....safeguards existing rail sidings and wharves where possible (taking into account location, size and capacity constraints of the rail network in particular) and supports new non-road infrastructure facilities.....” • Deletion of maps 18 & 19 from mapbook B2. At this stage pending a review of the Neville Hill area (it may be required for a new locomotive depot) and Hunslet Riverside we do not consider it appropriate at this time to suggest any further site for safeguarding under this policy. See Word Doc response for details. 	<p>Suggested wording is helpful.</p> <p>Work on-going to identify alternative rail sidings and to provide support for an inter-modal facility somewhere along the Hunslet to Stourton line.</p>	<p>Review and consider inserting suggested wording.</p> <p>Work on-going to identify alternative rail sidings and to provide support for an inter-modal facility somewhere along the Hunslet to Stourton line.</p>
71	David Berry	The Coal Authority	<p>Although mining legacy problems and issues occur as a result of mineral workings, it is important that new development delivered through the Local Development Framework recognises these and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>As the Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.</p> <ul style="list-style-type: none"> • The comments which the Coal Authority would like to make in relation to mining legacy issues are: • Representation No.2 Preferred Policy Position – Land 2: Contaminated Land Test of Soundness Justified Effective Consistency With National Policy x <p>Comment –</p>	<p>Comments noted.</p>	

			<p>The proposed policy approach towards the redevelopment and remediation of contaminated land is welcomed. Given the legacy of coal mining within the Leeds area, and for the reasons outlined above, the Coal Authority considers that this approach could be widened to incorporate the opportunity to assess and address any coal mining-related land instability or other public safety issues as part of the development process.</p> <ul style="list-style-type: none"> The inclusion of additional text/criteria on land instability within the proposed policy approach would ensure consistency with the requirements of PPG14. <p>Reason – To ensure that this important locally distinctive issue is properly addressed through the DPD in line with the requirements of PPG14.</p>		
75	Nicola Bell of Scott Wilson (agent)	PPL Revera	<ul style="list-style-type: none"> Preferred Policy Position – Land 3: Urban Tree Planting is supported in principle. However, encouragement for tree planting should not be restricted to urban areas as the title of the policy position suggests. It is suggested that the word ‘urban’ is removed from Preferred Policy Position – Land 3 to avoid any misinterpretation. 	<p>Woodland planting is encouraged in the Core Strategy and it sets a target.</p> <p>The purpose of this policy is to address the specific need for <u>urban</u> tree planting with particular regard to urban cooling.</p>	Cross refer to Core Strategy.
78	Jon Dodwell	Commercial Boat Operators Association	<ul style="list-style-type: none"> Q4: Yes. Suggest more wharves be added to the list. Suggests looking at land ownership in connection with wharves to prepare for/preempt problems like those in London 	Agree, this consultation has brought forward more wharves that may be suitable for safeguarding.	Safeguard additional wharves, consult with landowners.
79	Mr GA Whiteley		<ul style="list-style-type: none"> wants to see land and wharves on the Aire and Calder Navigation reserved for waterborne cargo. 	Support welcomed.	
80	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<ul style="list-style-type: none"> PPPL1: it is suggested that this could be expanded to include secondary processes such as ready mixed concrete manufacture, this has the added benefit of contributing to PPPL4, which is a satisfactory policy position. 	Agree, policy does in fact include secondary processes as well but only with regard to brownfield land.	
83	Matthew Fowler		supports wharf safeguarding. Q2-4: Yes	Support welcomed.	

86	Lionel Sykes		<ul style="list-style-type: none"> • Q2: We need to develop and reuse all brown/grey land and leave all the green belt untouched apart from the additional trees and I mean the correct ones. • Q4: Leeds has a very poor transit (bus) system for a major city. The buses may be new but they are very rare to keep to a time table, unfortunately the driver are not helpful, when you do come across a polite driver it is so noticeable. We should of had an underground installed in the early 70s, (if Newcastle could do it, I am sure Leeds could, but I guess the city fathers of that era were not only deaf but blind too. If you have an efficient bus/tram/rail system you would take 65% of private cars off the roads in the inner city, until then we can dream. 	<p>This is a Core Strategy issue.</p> <p>Leeds is promoting a New Generation Transport System to replace the supertram proposal.</p>	
94	Mrs Ann Slater		<ul style="list-style-type: none"> • Only existing - no new building of wharves to handle waste. 	New wharves are not proposed, only existing.	
97	Trevor Maggs		<ul style="list-style-type: none"> • Supports Safeguarding Wharves 	Support welcomed.	