

AIR QUALITY COMMENTS					
Ref	Name of respondee	Organisation	Comments	LCC Initial Response	Action
31	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<ul style="list-style-type: none"> Paragraph 5.2 - Air Quality Management (Page 27) In the last sentence, where it states “a majority of respondents thought there should be a presumption against developments which may impact upon air quality”, it should be recognised that this doesn’t quantify whether those impacts are significant or not, and whether the impacts can be reduced through appropriate mitigation. Preferred Policy Position - Air 1: Air Quality Management of Developments (Page 28) Whilst it is considered appropriate for certain developments to consider, through appropriate risk assessments (which may include health impact assessments), the potential effect of the proposed development on local air quality, it is considered that any potential effects (after mitigation) should be considered in the context of whether they prevent/interfere with the implementation of measures set out within Leeds’ Air Quality Action Plan. Preferred Policy Position - Air 2: Low Emissions Zone(s) (Page 28) Veolia would wish to understand where the proposed ‘Low Emissions Zones’ are to be located before making further comment. 	<p>Comment noted, text referred to relates to issues and options results.</p> <p>Air Quality Action Plan is not designed for this purpose nor is it a planning tool, therefore PPP Air 1 is a necessary planning policy.</p> <p>Point Noted. More definition of the types of areas/sensitive receptors that will be covered by this policy.</p>	<p>None</p> <p>None</p> <p>LEZ feasibility work is on-going by the LCC Environmental Studies Team within the Transport Planning section.</p>
36	Dr Kevin Grady	Leeds Civic Trust	<ul style="list-style-type: none"> (Air 2) Objects to LEZs More appropriate measures which would address other issues as well as emissions would be limits on workplace parking, limit on expansion of the airport and introduction of electric/hybrid public transport (road and rail). 	<p>Objection Noted</p> <p>Included within Low Emission Strategies in supporting text</p>	<p>LEZ feasibility work is on-going by the LCC Environmental Studies section.</p>

55	Colin Holm	Natural England	<ul style="list-style-type: none"> We welcome 'Preferred Policy Position – Air 1: Air quality management of Developments' and would advise that requiring low emission strategies for developments that may generate significant traffic pollution offers a viable means of addressing some of the air quality impacts of developments. Further information on low emission strategies is available from http://www.lowemissionstrategies.org/ 	Support Welcomed	Check weblink.
58	Mary Keynes	Impact Residents Network	<ul style="list-style-type: none"> We agree with Air Quality policies, and also that air quality should be monitored in older parts of the city which are subject to heavy traffic. Planners should be able to require measures to improve air quality in older districts such as ours. Moreover, we are very concerned that reported plan to build an incinerator in LS09 could endanger our air quality, as has been reported from other incinerator sites which have shown a damaging environmental impact on a large zone around the incinerator. We recommend strongly that we and other adjacent communities should be included in consultations on this plan to build an incinerator in one of the most densely populated areas in Europe. We strongly support this, and suggest that selection of these Low Emission Zones should be related to the monitoring of air quality as proposed in the previous two questions. 	<p>There is a continual air quality audit process across the whole District. Potential impacts on air quality are assessed within the Sustainability Appraisal objectives. Evidence demonstrates the area is able to accommodate waste technologies. No evidence to suggest incinerators endanger air quality due to highly stringent regulations.</p> <p>Support welcomed and comments noted.</p>	Further work to produce principles of LEZs is required and to decide whether they will be taken forward.
	Stuart Beardwell	Leeds Friends of the Earth	<ul style="list-style-type: none"> 10 Further consultation needs to be done to determine where LEZs would be. Equal access to good quality air needs to be ensured. 11 This will be a good idea as long as steps are put in place to make Low Carbon transport more affordable and the infrastructure in place to support new technologies i.e. electric car charging points. 	<p>If we do define them, a thorough consultation will be undertaken.</p> <p>This will be looked at as part of the low emissions strategies.</p>	Further work to produce principles of LEZs is required and to decide whether they will be taken forward.

65	Mr. Zulfiqar Ali	Environment Agency Y&H	<ul style="list-style-type: none"> Air 1: Air Quality Management of Developments We support the policy but would add the specific advice below with particular reference to new waste development. <p>Some waste management facilities have the potential to effect air quality. Any waste management facility would be subject to a permit under the environmental permitting regulations. The objective of the permit is to prevent harm to the environment or human health. For incinerators emission limits are set to comply with those in the WID which are based on World Health Organisation Standards. A permit would not be issued in a particular location if air quality standards would be breached as a result of the installation.</p> <p>There may be a cumulative effect on air quality if several facilities are sited in close proximity and this must be taken in to account as early as possible. As such this should be referred to in the DPD.</p> <p>Odour is mentioned in the policy and this is a key issue for us. We would advise separating odour from air emissions as an impact, experience tells us that odour is the most common cause of complaint and has to date been more of a problem with technologies designed to handle large quantities of mixed biodegradable waste.</p>	<p>Support welcomed.</p> <p>Comments will be incorporated within the DPD.</p> <p>Agree this is necessary.</p> <p>Agree this distinction is worth reflecting</p>	<p>Incorporate into text.</p> <p>Will be completed through the SA and reflected in the final submitted policy</p> <p>To reflect distinction and include wording on odour.</p>
80	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<ul style="list-style-type: none"> Q10 No, comments: sufficient legal action exists outside the Planning Regime to address air quality matters. There is a danger of duplication of regulatory functions 	<p>Aware, but for the purposes of the LDF it is appropriate to consider the air quality impacts on development decisions.</p>	<p>None.</p>

88	Mike Harty	Biffa Waste Services Ltd	<ul style="list-style-type: none"> • Objects to planners requiring measures to improve air quality and objects to LEZs. 	Objections noted.	None
91	FM Lister (Trustees)	Henry Hudson (deceased) estate	<ul style="list-style-type: none"> • Q10: No: Do not agree that all development should include aspects to <u>improve</u> air quality. But when the development involves the likely degradation of air quality the proposal should certainly contain measures to <u>safeguard</u> air quality. • Q11: No. Do not favour the creation of LEZs at this time. 	<p>The policy seeks to incorporate measures commensurate to the scale of the development.</p> <p>Objection Noted.</p>	None
93	Mr Kenna		<ul style="list-style-type: none"> • Q11: with regards to lowering emissions there are already many industrial units in east Leeds area. Transporting waste to this location from across Leeds will only add further to this. Plus extra emissions from incinerator 	<p>The DPD strategy seeks to locate facilities in a way that minimises transportation impact. The new Energy from Waste facility is not likely to lead to an overall increase in emissions. This is assessed as part of the sustainability appraisal.</p>	None