Ref	Name of	Organisation	Comments	LCC Response	Action
3	respondee Susane Farrar	N/A	The Council could save energy by turning off unessential street lighting and turning off the Christmas lights earlier each night.	Comments noted.	None.
22	Ian Smith	English Heritage Y&H	<ul> <li>Reservations about the principle of including the amount of energy likely to be generated from Energy from Waste plants within the figures for renewable energy generation. The desire to increase the amount of energy which comes from renewable technologies could result in a greater amount of waste simply being burnt rather than being recycled.</li> <li>Concern about the scale of some structures associated with Energy from Waste plants. The Policy should expect any scheme and its location to be appropriate in terms of accessibility, sustainability issues, environmental considerations etc</li> <li>Support Policy Energy 2 for assessing the appropriateness of wind energy developments. This reflects the advice in national policy guidance regarding the protection of nationally-designated environmental assets.</li> <li>Support Policy Energy 3 for assessing the appropriateness of microgeneration developments as it includes regard to the impact upon conservation of the built environment.</li> </ul>	Policy Waste 1 supports the waste hierarchy and therefore encourages waste to be recycled and reduced in the first instance. However, there will always be residual and other waste that requires treatment and can contribute to renewable energy targets.  Normal development control principles regarding scale, design and siting will apply.  Support welcomed.	Explain in the text that normal DC principles apply.
26	Andy Parnham	LCC Councillor (Farnley Ward)	Energy Policy 4 - Energy from Waste Do NOT agree with incineration.	Support welcomed. The DPD does not advocate a particular technology.	Re-iterate in the text that the DPD does not advocate
			Do agree with wind energy, solar power, water power. (Para. 6.23)	Support welcomed.	a particular technology.
31	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<ul> <li>Para 1.14, Page 4         In Diagram 1 - Key Objectives for the NRWDPD, under 'waste', the fourth point should be amended to read "recover products and energy from waste".     </li> </ul>	Agree	Amend DPD to reflect suggested wording.

Support Policy Energy 1	Support welcomed.	
<ul> <li>ENERGY FROM WASTE         Paragraph 6.23 (Page 35)         The statement "EfW facilities use municipal household waste to generate power" is incorrect, since EfW facilities can also accept other wastes (such as commercial and industrial wastes) and are not limited to household waste. The statement should therefore be amended to reflect this.     </li> </ul>	Agree.	Amend text accordingly.
<ul> <li>Policy- Energy 4: Energy from Waste (Page 36)</li> <li>Clarify that support is for energy from residual waste.</li> </ul>	Support welcomed.	
<ul> <li>Reword bullet 1 "the proposals are supported by a study of the opportunities and potential for energy production and useage and as a minimum has an identified outlet for any electricity produced".</li> </ul>	Agree	Amend text accordingly.
<ul> <li>Reword bullet 2 "would not cause significant environmental effects that cannot be satisfactorily mitigated".</li> </ul>	Agree	Amend text accordingly
• Bullet 3. What is meant by "a study of alternative options"? - is this referring to a study of alternative options for treating the waste or a study of alternative sites or both? This needs clarification. Also, it is not clear why a specific assessment of financial viability would be necessary in the context of determining a planning application?	Agree this is not clear.	More work needed on this.
<ul> <li>Policy Energy 4 also needs criteria:         <ol> <li>to take account of cumulative impacts of waste development in a particular area;</li> <li>to expect sufficient transport infrastructure to support the sustainable movement of waste.</li> <li>to give priority to the re-use of previously developed sites</li> </ol> </li> </ul>	Cumulative impact is being assessed through the Sustainability Appraisal. Agree need to explore potential for a criteria based policy on this.	Explore potential for a criteria based policy on this.
Paragraph 6.24 - Combined Heat and Power and Preferred Policy Position - Energy 5: Heat and Power Recovery (Page 36) The linkage if any between Energy Policy 4 and Energy Policy 5 needs to be clarified. Where the document states (referring to CHP) "it is an established technology and can be implemented to support a district heating network", as highlighted above, it should be recognised that this is subject to overcoming practicality/ viability hurdles. Accordingly,	Agree need to improve links between Energy 4 and 5 but do not wish for policy to be too restrictive. We have used the words	Further work needed on Energy 4 and 5.

			<ul> <li>the policy should be amended to say "Seeks to encourage the application of CHP to current and future development throughout the District where practical and viable".</li> <li>Paragraph 6.25 - Heat Distribution Networks (Page 36) The text needs to recognise that the delivery of heat distribution networks is dependent on close co-operation of a range of key stakeholders and end users frequently over a long period of time.</li> </ul>	'where appropriate' which means the same as 'where practical and viable'. Not necessary to change this.  This is acknowledged in the section on 'Working in Partnership'.	None.  Include reference to heat distribution networks in the Working in Partnership section.
33	Matthew Trigg	RWE npower	<ul> <li>RWE npower's view is that Policy Energy 4 should accord with this criteria based approach set out in paragraph 21 of PPS10 which seeks to assess:         the conformity of waste development proposals with guidance in PPS10,             environmental and physical constraints, and cumulative impacts of waste development in a particular area;             the suitability of transport infrastructure to support the sustainable movement of waste.             In addition, the policy should also reflect guidance in PPS10 which states that priority should be given to the re-use of previously developed sites for waste related uses.     </li> <li>RWE npower supports the selection of its Skelton Grange Power Station site as a proposed strategic waste site, particularly as an EfW facility.</li> </ul>	A criteria policy may be helpful but is only necessary if it adds something further to PPS10. Need to consider if there is anything specific to Leeds that we need to include.  Support welcomed.	Consider producing a criteria policy for energy from waste but only if it adds something further to PPS10 and the waste policies and in the light of the Saved UDP policies.
35	Mr Robert Sladdin	University of Leeds	<ul> <li>In the Introduction paragraph 1.1 add 'Identify opportunities for reducing energy usage' as it is at least an equal priority to renewable energy.</li> <li>Develop infrastructure to support electric vehicles.</li> </ul>	Energy efficiency is dealt with in the Core Strategy.  Potentially include a criteria policy to support infrastructure for evs.	Improve links between documents to cross refer to Core Strategy. Consider criteria policy.

36	Dr Kevin Grady	Leeds Civic Trust	•	(Energy 1) Improving the energy efficiency of the existing stock of housing is a national issue which needs to be addressed by central government.  (Energy 3/5/6) an assessment of the potential for heat pumps, thermal mass heat storage should be a requirement for all developments. LCC could be an exemplar through its school development programme and the Arena	Energy efficiency is dealt with in the Core Strategy.  Heat pumps are not always viable for every development. Need to allow developer to choose the most appropriate technology.	Improve links between documents to cross refer to Core Strategy
45	Rachel Wigginton	GOYH	•	Policies need to add to national and regional guidance and to core strategy policies i.e. be locally specific, otherwise they are not necessary.  Para 6.7 and PPP – Energy 1 If this is to be a strategic policy in the Core Strategy, there is no need to repeat it here. It is also necessary to address the more demanding policies that will be required in the proposed urban eco-settlement in the Aire Valley, in accordance with the PPS1 Eco Town supplement. Reference should be made to these policies in other documents if they are not in this DPD.  Saved Policy N54 should be replaced in this DPD.	Point noted.  Agree this policy may not be necessary if the links are improved to the Core Strategy.  N54 is replaced in the Core Strategy, however more detailed policies for each different type of RE need to be developed in this DPD.	Improve links between documents to cross refer to Core Strategy  More detailed policies for each different type of RE need to be developed in this DPD.
46	Angela Flowers	North Yorkshire County Council	•	With regard to energy efficiency, this could be applied to the whole life cycle of development and zero carbon standards are likely to be applied to buildings other than homes beyond 2016 (i.e. 2019).  The Council may wish to refer to the document 'Permitted development rights for small scale renewable and low carbon energy technologies, and electric vehicle charging infrastructure', a CLG consultation which closed on 9th February 2010 which, like the policy position has regard to cumulative impacts, it also includes other impacts such as vibration arising from wind energy.	Energy efficiency is dealt with in the Core Strategy.  Agree, this sounds useful.	Improve links between documents to cross refer to Core Strategy.  Take account of the CLG consultation in further work.

48	Heaton planning (agent)	D Green, UK Coal Ltd	•	COAL AND ENERGY <b>Cross reference with Minerals</b> There is only a presumption against surface coal mining if it does not meet the tests as set out in MPG3, para 8.	See minerals section for further details. Have agreed to define an MSA for surface coal.	
			•	The NRWDPD should have clear regard to the aims of the Government's White Paper on Energy: Meeting the Energy Challenge, May 2007. In particular paragraph 4.25, page 111, recognises that coal-fired generation makes an important contribution to the UK's energy security and the flexibility of the UK energy system, while acknowledging that in order to have a long term future its environmental impact must be managed effectively.	This section is specifically about renewable energy in line with the Government's target to increase renewable energy production in the UK.	Clarify in the text that the purpose of this section is specifically with regard to promoting
			•	Paragraph 4.27, page 112, acknowledges that the UK's coal resources have the potential not only to help to meet our national demand for coal and to reduce our dependence on imported primary fuels, but also to contribute to the economic vitality and skills base of the regions where they are found.	There is a specific requirement in the PPS1 Supplement, for LDFs to demonstrate how they will encourage	Renewable Energy.
				Page 124, says there is a value in maintaining access to economically recoverable reserves of coal.'	renewable energy. The same requirement doesn't exist for coal.	
			•	The UK Government published 'The Energy Challenge: Energy Review Report' (Cm 6887) in July 2006. is concerned about energy security and loss of the indigenous coal production. (Para 4.23)		
				Leeds' coal resources should be safeguarded to help the UK enhance energy security and to offer a more sustainable solution than imports from distant countries	Leeds will produce an MSA for surface coal in order to protect the resource.	Produce MSA for surface coal (See Minerals table).
49	Barton Willmore (agent)	John Wignall, Towngate Estates Ltd	•	PPP2: clarification of "areas of ecological importance" requested.  PPP5: In support of concept.	Clarify that this is referring to national and local designations. Support welcomed.	Amend policy accordingly.
51	John Pilgrim	Yorkshire Forward		<ul> <li>Supports CHP in Leeds where economically viable</li> <li>Support wind energy but suggest more positive phrasing of the policy position. Suggesting "promote and encourage, rather than restrict " wind energy whilst taking into account any impacts, visual and otherwise.</li> </ul>	Support welcomed.  Comment noted. Will consider suggestion as part of re-drafting.	Consider suggestion and redraft accordingly in the Publication draft.

52	Nicole Harrison, Arup.	Aire Valley Environmental	AVE support EFW particularly with relation to identified outlet for energy, co-location and energy efficient synergies	Support welcomed.	Further work
	, wap.		Supports CHP Supports principles of Heat Distribution Infrastructure but concerns about over prescriptive terms and possibility they may become a barrier	Support welcomed. Further work is to be carried out on this Policy.	is to be carried out on this Policy.
53	Martyn Coy	British Waterways	Paragraph 6.8 – Renewable Energy Generation Inland waterways provide opportunities for renewable energy generation, for example through small-scale hydropower and wind turbines. BW is exploring opportunities for hydropower devices on its network. In addition, BW has developed a method for using temperature differentials in water to offer cooling to waterside buildings.	Agree more work needed on hydro-power.	Meet with BW to discuss further.
55	Colin Holm	Natural England	Policy Energy 1: should set out targets for energy efficiency within new developments.at least consistent with Buildings Regulations targets and for non-domestic developments.	Energy efficiency is dealt with in the Core Strategy.	Improve links between documents to cross refer to
			<ul> <li>Policy Energy 2: should add criteria:</li> <li>-the areas of ecological impacts' should include impacts on statutory and non-statutory sites for nature conservation (such as Local Nature Reserves and local wildlife sites), UK Biodiversity Action Plan species and habitats, the presence of protected species, and areas of deep peat;</li> <li>-impacts on recreation and access; and</li> <li>-impacts on the historic environment and cultural heritage</li> </ul>	Agree	Core Strategy.  Amend Policy as suggested.
			More detail can be found at <a href="http://www.naturalengland.org.uk/Images/NEBPU1805Annex2_tcm6-15152.pdf">http://www.naturalengland.org.uk/Images/NEBPU1805Annex2_tcm6-15152.pdf</a> .	Point noted regarding	
			Policy should make clear that wind energy developments are not confined to wind turbines alone, but may also include additional associated infrastructure such as roads and grid connections.:	grid connections. Transport infrastructure is already included in the Policy.	
			Policy Energy 3: should consider the impact of micro generation on biodiversity with the need for ecological surveys decided on a case by case basis. There can be conflicts such as turbine interference with a bat roost, or micro hydro development affecting the habitat of water voles or otters.	Agree	Add ecology bulletpoint.

58	Mary Keynes	Impact Residents Network	We agree that provision of most of these sources of renewable energy should be encouraged. We strongly support an increase in the development of wind energy, and suggest that there should be serious investigations of ways of reducing the impact of wind farms on highway safety, aeronautical radar and transmission masts reception, whether by technological developments or by better management.	Support welcomed but we do not agree that wind turbines affect highway safety.	
59	Ed Carlisle	Together for Peace	Policy Energy 2: LCC should look at incentives for people to install wind turbines. Particularly considering neighbourhood primary schools, or faith buildings carry emotional weight for people	Support welcomed.	
			Policy Energy 3: LCC should look at incentives for people to install micro generation in neighbourhoods and homes,–	Make cross references in the text to incentives.	Amend text accordingly.
			Exemplary eco schemes should be promoted such as anaerobic digestors to turn waste into methane?.	Agree, DPD promotes the waste hierarchy whilst remaining	Expand the
			Partnership with communities is needed (via local coops or CICs etc?) so that Leeds provides start up funding and communities supply the management	Agree. There is a section on this in the DPD already.	Working in Partnership section.
61	Stuart Beardwell	Leeds Friends of the Earth	Omissions that need addressing: 1) provision of information for reducing energy consumption 2) the need for better design i.e. passive solar gain. 3) the need for speading the cost of capital investment and reducing pay-back time. This could be achieved by local schemes where capital costs are paid back through fuel bills and are linked to the property so people can afford to invest in properties even if they may need to move at a later date.	Energy efficiency is dealt with in the Core Strategy.  Not possible for the planning system to facilitate this.	Improve links between documents to cross refer to Core Strategy.
			Policy needs to provide greater encouragement to wind turbine developments so that proposals like the one at Hook Moor can be approved subject to the satisfaction of the MoD.	Point noted. Will consider the suggestion as part of the re-draft.	Consider the suggestion as part of the redraft of policy.
63	Matt Naylor	Yorkshire Water	<ul> <li>Supports wind energy policy</li> <li>Supports EFW especially with regards to co-location and identified outlet for energy</li> </ul>	Support welcomed.	
65	Mr. Zulfiqar Ali	Environment Agency Y&H	Energy 3: Micro-generation Development     We would suggest as a 6th Bullet point the highlighting that protection and enhancement of Biodiversity should be added in.	Agree.	Add bulletpoint.

	ı	T			
			<ul> <li>Energy 4: Energy from Waste         Waste used for Energy from Waste (EFW) should be residual waste         and therefore unsuitable for other uses which are higher up the waste         hierarchy (reuse, recycling and composting). Without adequate         materials recycling and sorting facilities it is not possible to be         confident that this would be the case especially for commercial         industrial waste where there is less information about its composition.         Plans for energy from waste should be accompanied by improved         segregation and sorting commercial industrial waste. Cross reference         with waste</li> <li>Energy 5 and 6         We very much support the aspiration to use Combined Heat and         Power for district heating networks.</li> <li>Microgeneration         We strongly encourage ground source heat pump (GSHP) systems to         be operated sustainably. In most cases this means there should be a         balance between demand across a year for schemes using heating         and cooling. This will avoid unacceptable heating or cooling of the         ground and groundwater.</li> </ul>	Policy Waste 1 supports the waste hierarchy and therefore encourages waste to be recycled and reduced in the first instance. However, there will always be residual and other waste that requires treatment and can contribute to renewable energy targets.  Support welcomed.  Beyond remit of the Planning System.	
75	Nicola Bell of Scott Wilson (agent)	PPL Revera	<ul> <li>Policy 2 Wind Energy: lacks the necessary detail to give wind farm developers and landholders the advice/guidance and assurity needed to encourage developments to come forward.</li> <li>New policy suggested at the beginning of the Energy section::         <ul> <li>'When determining renewable energy related planning applications Leeds City Council will;</li> <li>look favourably on proposals for renewable energy;</li> <li>not require applicants to demonstrate the overall need for renewable energy to be sited in a particular location; and</li> <li>ensure any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances.'</li> </ul> </li> <li>Para 6.11 - Of the minimum target of 75MW of renewable energy generated in the Leeds District by 2021, 40MW is the estimated</li> </ul>	Wind energy 2 needs to be read in conjunction with the Wind Speed Map which does give an indication of the most viable areas. It may be possible to identify Areas of Search for wind and we will look at this.  This is a repetition of national policy. Leeds will be carrying out further work on this section.	Consider identifying Areas of Search for wind energy.

contribution from wind power. The RSS target is a minimum target, and subject to further review will be revised upwards if it is met. Meeting the target should not prejudice further renewable energy proposals as and when they come forward.

- Figure 9 shows wind speed measured in metres per second at 45 m above ground level. As typical wind turbine height is more than 90m Figure 9 is not reflective of the height where wind speed becomes an important factor. Also, PPS22 states that local planning authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects. The following wording should be added to Para 6.14: 'Figure 9 provides a generalised indication of Leeds' wind resource by providing estimated mean wind speed data for Leeds District in metres per second and measured 45 metres above ground level. This suggests that wind energy development would be viable in the Leeds district. It is acknowledged that wind speeds may be greater than that shown in Figure 9, above 45 metres.
- Given the nature of wind farms (which require significant spacing between the turbines and sensitive receptors), it is unlikely that they can be accommodated, to any great scale within the urban areas, and thus there needs to be an acknowledgement that for Leeds to deliver the renewable energy through wind power to the level indicated, some will almost certainly need to be located within the green belt.
   Parlington is promoted as a suitable area for wind turbines.

Page 6 of PPS22 advises that climate change issues and the need to generate energy from renewable sources could be considered to outweigh any harm to the green belt, and any other harm. It is therefore suggested that the following wording (which reflects the message relayed in paragraph 13 of PPS22) should be inserted into the NRWDPD after para 6.15

'PPS22 does not set out a sequential approach to site selection for renewable energy proposals in terms of land use and designations. It is acknowledged that because of the nature of the Leeds District and some renewable energy schemes (particularly wind farms) proposals may come forward in the green belt that have elements that will comprise inappropriate development, which may impact on the openness of the green belt. Careful consideration will therefore need to be given to the visual impact of projects, and developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason of

Need sound planning reasons for rejecting any planning application.

Figure 9 is based on the Government's modeling and is the only evidence base available to us on wind speeds. It is clear that it is indicative and that further testing would need to be done to confirm precisely what the actual wind speeds are.

PPS22 states that wind turbines are inappropriate development in the GB unless demonstrate very special circumstances. Leeds will consider identifying Areas of Search for wind energy which will indicate which areas are most suitable.

Leeds does not consider the suggested wording to be necessary. However, we recognize that it would be helpful to identify Areas of Search for wind energy. Clarify in the text that the target is a minimum.

Identify Areas of Search for wind energy.

inappropriateness and any other harm if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.'

Draft PPS15 places a greater emphasis on the distinction between direct effects on a cultural heritage asset and effects on its setting. It also gives recognition that a need for a development may play a crucial role in determining whether adverse effects may be acceptable when it comes to settings of cultural heritage assets (e.g. listed buildings, scheduled monuments, conservation areas and archaeological remains). This is an important issue for wind turbines specifically but also wording should reflect the fact that addressing climate change is one of the factors highlighted in the context of need within the draft PPS15. We therefore propose the following:

'when assessing proposals for wind turbines which may have an adverse effect on cultural assets. Leeds City Council will have regard to PPS15, specifically that such schemes are highlighted in the context of need and that this will be weighed accordingly in the determination of planning applications.'

This is national policy and it is not necessary to repeat it.

It is noted that earlier consultation identified that 'most people thought that the NRWDPD should provide both criteria-based and specific spatial guidance' (para 6.9). PPS22 advocates that polices should be based on criteria rather than specific spatial guidance and such criteria should be worded positively rather than a series of negative constraints | Leeds intends to identify towards renewable energy developments. Also, wording needs to be inserted to reflect the approach taken in PPS7 which deals with landscape designations and indicates that there should be sufficient protection under criteria-based policies (for example based on landscape character assessment) to avoid the need for rigid local designations that may unduly restrict acceptable sustainable development and important economic activity in rural areas. Wind farms in particular should not be precluded on account of their proximity to spatially biased local designations such as 'Special Landscape Areas'.

The PPS1 Supplement on climate change updates PPS22 with regard to this issue. Areas of Search for wind energy.

The opening sentence to Policy Energy 2 should be amended as follows: 'Wind energy developments will be viewed positively with a presumption in favour of development and will be judged on whether its | national policy. energy contribution and other benefits can be shown to outweigh any

No need to repeat

			significant impacts on:'		
			<ul> <li>For micro-generation that is "Permitted Development" (e.g. solar panels, individual wind turbines) it will be very difficult to record the provision they make accurately and thus demonstrate their tangible contribution to the 75MW of installed grid connected renewable energy target for Leeds. This needs to be made clear in the supporting text.</li> <li>The second part of Policy Energy 3 is negatively worded. The following positive wording is suggested: 'The Council will encourage proposals for micro-generation technologies and they will be judged on whether its energy contribution and other benefits can be shown to outweigh any impact on'</li> <li>The Parlington estate is promoted as having the potential to deliver an energy from waste scheme. Anaerobic digestion could be delivered to process waste generated, in part, from surrounding communities and the estate, to reduce travel between source and process. It has good</li> </ul>	Disagree that there is any need to make reference to this. We will not expect permitted developments to contribute towards the target.  This is Green Belt and Special Landscape Area and therefore not an appropriate location for an Energy from Waste plant.	Consider using suggested wording.
			road connections.	piant.	
82	David Blackburn	LCC Councillor (Farnley Ward)	Energy Policy 4 - Energy from Waste (Question 12) - Do NOT agree with incineration. Do agree with wind energy, solar power water power. (Para. 6.23)	DPD is technology neutral and does not specify the technology that will be used for the energy from waste.	The Waste Management Section of LCC is carrying out further public consultation on the Residual Waste Treatment facility.
85	Ann Blackburn	LCC Councillor (Farnley Ward)	Energy Policy 4 - Energy from Waste (Question 12) - Do NOT agree with incineration. Do agree with wind energy, solar power water power. (Para. 6.23)	DPD is technology neutral and does not specify the technology that will be used for the energy from waste.	The Waste Management Section of LCC is carrying out further public consultation on Residual Waste

					Treatment.
86	Lionel Sykes		Objects to wind power. Any person on LCC who is pushing for wind power must be in the pocket of the company who install them.  Supports EFW as a policy to prevent future landfill	This is insulting towards Council officers who work very hard in the public interest. Support welcomed.	
	Broadbent				
88	Mike Harty	Biffa Waste Services Ltd	<ul> <li>Support policies on renewable and wind energy.</li> <li>Biomass as energy source should not be discounted.</li> <li>EFW can also generate power from commercial/industrial waste.</li> </ul>	Support welcomed. We recognize the DPD needs to say more about biomass.	
			<ul> <li>PPPE4: no requirement that developers consider alternative sites.</li> <li>Planning authorities should not consider financial viability of projects.</li> </ul>	obligations and mitigations which developers need to meet.	Delete bulletpoint. Need further explanation of this point.
91	FM Lister (Trustees)	Henry Hudson (deceased) estate	Support for all six sources of renewable energy, but careful consideration of aspects should be undertaken before decision.  Prefer use of wind energy. Potential issues of lesser relevance.	Support welcomed and comments noted.	None.
99	Mr Philip Hutchins	Woodkirk Stone Sales Limited	Wind energy should be amongst several options for renewables and not a 'special case'	Agree.	Provide more guidance on other forms of renewables.
100 /101	K. L & G Townend	Save Our Home and Environment	Objects to Policy 4 and the location of any proposed incinerator. Feels that the area has enough industrial /waste facilities already and it is unfair/unjust to overload one area.	The site selection study for waste management sites looked at locations all over the District and Cross Green was found to be the most appropriate location.	None