

WASTE COMMENTS					
Ref	Name of respondee	Organisation	Comments	LCC Initial Response	Action
022	Ian Smith	English Heritage Y&H	<p>Support the intention to have a strategy which actively encourages waste minimisation. The LDF should reduce the amount of this type of waste being created by including policies (within either the Core Strategy or other DPDs) which seek to encourage the reuse of existing buildings. Only where the reuse of an existing building could be shown to be impracticable or a less sustainable solution, should demolition of the building be permitted. The explanatory text to this Policy should set out how the plan, as a whole, will seek to reduce the amount of this type of waste being generated.</p> <p>Concerns about the process to identify the Residual Waste Treatment facility on Map E. Whilst the Council have made a report about the choice of sites publicly-available, this was not subject to a formal consultation process - nor have the range of possible sites been tested through an SEA/Sustainability Appraisal.</p> <p>Consulting on only four sites, all of which lie within one particular sector of the city gives consultees limited choice. Wider consultation on sites ranging across the whole city would have been appropriate to such an proposal.</p> <p>Concerned how the potential waste treatment sites were assessed as part of Stage 3. There is nothing within the Report which sets out the assumptions used regarding the scale of buildings which might be built as part of the development of these sites. In the absence of such assumptions, it is difficult to adequately assess the likely impact which such a facility might have upon the surrounding area. A typical EFW plant of 40 to 60 metres in height, with an 80 metre stack, could have a significant impact on environmental assets a considerable distance from the site of the plant.</p> <p>Disagree with the assessment of the impact which the top four sites in Table 4.2 might have upon the City's historic environment. All four sites could, potentially, have an adverse effect upon the character and setting of a number of historic assets in their vicinity. Given the lack of assumptions regarding the scale of development likely on each site, it is difficult to ascertain why a particular score has been attributed to each of</p>	<p>Most demolition is permitted development (unless it is a Listed Building or in a Conservation Area). The CS requires BREEAM and Code for Sustainable Homes standards to be met, which indirectly encourages the reuse of buildings.</p> <p>This consultation is an opportunity to comment on the Site Selection process. SA/SEA considerations were used to short list the sites during the study. The final selected sites will be subjected to a further formal SEA/SA process. It would have been pointless to consult on sites that have no chance of going ahead.</p> <p>The potential impacts referred to were all taken into account during the site short-listing process and weighed against other planning issues. The assessment concluded that the Aire Valley is the most suitable location because it is predominantly industrial.</p> <p>Detailed proposals for sites will need to consider the</p>	None

			<p>these sites. All four of these sites should have scored 2 (and possibly 1) and certainly not 3. Depending upon the scale of the development, an EFW plant on any of these sites could impact upon the setting and views out of the Grade II Registered Historic Park and Garden at Temple Newsam (the principal building of which is the Grade I Listed Temple Newsam House). The northern edge of the Knostrop Site lies less than 400 metres from the boundary of this registered landscape. The group of Grade II Listed Buildings at Thwaites Mill lie only 60 metres from the southern edge of the western part of the Knostrop Site and only 400 metres from the Power Station Site. There is no indication whether, if permission is granted on one of the sites, this would preclude development of the other three. No indication is given regarding what types of Strategic Waste treatment might be appropriate on each.</p>	<p>impact on heritage through an EIA and provide appropriate landscape mitigation.</p> <p>The Site Selection process did not assume any one particular technology. The DPD is technology neutral.</p>	
026	Andy Parnham	LCC Councillor (Farnley Ward)	<p>Waste Policies 3 & 4 - Providing Self Sufficiency for C&DE Waste and Waste Policy 9 -Waste Uses Within Existing Industrial Areas</p> <p>(Question 16) - Of the 5 sites proposed under Para. 7.81, 7.42 and 7.47 (Policy Position), object to the sites on Ashfield Industrial Estate and Far Royds 'F' being extended (Ashfield Ind. Est. is at the back of Cobden Primary). Object to the extension of sites No. 140 Ashfield Way (McHugh Plant) or Site No. 145 Ashfield Way (Mone Bros) 'C2'.</p> <p>Waste Policy 7 - Safeguarded Existing Waste Management Sites Para. 7.64 – Object to extension of Site No. 140 Ashfield Way (McHuch Plant) and Site No. 145 Ashfield Way (Mone Bros).</p> <p>Object to Site No. 194 Upper Wortley Road (Matthews) 'D' Site. It is an eyesore and near a residential area and access would cause highways issues.</p>	<p>These sites are proposed for retention as important existing sites, some have potential for intensification and extension but would only be allowed if environmental circumstances allow.</p> <p>This is an existing site which it is NOT proposed to safeguard.</p>	None
030	John Dodwell	Commercial Boat Operators Association	<p>In view of the fact that Skelton Power Station site be a strategic waste site, we recommend that Skelton Grange Wharf on the Aire and Calder Navigation be added to the safeguarding list as there will be scope to take recyclates (e.g. scrap metal, glass etc) away by barge.</p>	<p>Comments noted</p>	<p>Review the potential for safeguarding of this wharf.</p>

031	Scott Wilson (agents)	Nick Hollands, Veolia Environmental Services Ltd	<p>Para 1.9 & 1.10, Page 3 - In general, the vision of the DPD is supported.</p> <p>Paragraph 7.10 - Meeting the Future Waste Management Needs for Leeds (Page 41). Paragraph 7.10 is supported, however a new sentence should be added at the end along the following lines: “However as the quantities of waste arisings are substantially greater than for municipal waste streams the additional capacity required will also be far greater if landfill diversion and sustainable waste management practices for such waste streams are also to be secured”.</p> <p>Preferred Policy Position - Waste 1: Self-Sufficiency for Future Waste Management in Leeds (Page 42) is supported.</p> <p>Preferred Policy Position - Waste 2: Providing Self-Sufficiency for MSW (Page 47), together with the supporting text at paragraph 7.32 is supported, particularly with regard to the policy for residual waste treatment. Of the four sites highlighted on Map E, the site of the Former Wholesale Market in Cross Green is considered to be particularly suitable for the development of a large scale, strategic residual waste treatment facility.</p> <p>Preferred Policy Position - Waste 3: Achieving Self Sufficiency for C&I Waste (Page 49) is supported.</p> <p>Preferred Policy Position - Waste 8: Strategic Sites for Waste Treatment (Page 56) is generally supported. However, the need for proposals to “demonstrate how they meet the criteria in Annex E of PPS 10” is queried, since Annex E of PPS 10 refers to ‘Locational Criteria’ which should be taken into account by Waste Planning Authorities when assessing the suitability of areas/sites for waste management. Presuming that the Council has applied this approach when determining which sites are to be identified on Map E, there should be no need for this assessment to be duplicated by the developer at the application stage. Perhaps what the Council means to pick up on is the ‘advice on likely impacts and the particular issues that arise with specific types and scale of waste management facilities’, which is given in the accompanying practice guide - and it is this that should be referred to instead.</p> <p>Para 1.14, Page 4 In Diagram 1 - Key Objectives for the NRWDPD, under ‘waste’, it is considered that the fourth point should be amended to read “recover products and energy from waste”. The document goes on to talk about</p>	<p>Support welcomed.</p> <p>Noted, we are aware of this. Sentence not necessary as it states the obvious.</p> <p>Support welcomed</p> <p>Support welcomed</p> <p>Support welcomed</p> <p>Agree.</p> <p>Agree</p>	<p>None</p> <p>Amend policy to incorporated suggested wording.</p> <p>Amend policy to incorporated</p>
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			support for energy from waste (particularly in sections 6 and 7), however this is not reflected anywhere in the objectives.		suggested wording.
33	Matthew Trigg	RWE npower	RWE npower supports the selection of its Skelton Grange Power Station site as a proposed strategic waste site, particularly as an EfW facility. The policy should recognise that the site is also appropriate for other employment related uses. Planning permission has already been given for significant employment related development and there are no infrastructure constraints.	Support welcomed	Agree to allocate sites and retain allocation until no longer required for waste.
036	Dr Kevin Grady	Leeds Civic Trust	<p>As C&DE waste is such a large proportion of that generated in the district, greater emphasis should be given to minimising its production – this will also address other issues such as the energy embedded in present buildings. There should be a policy to encourage reuse/remodelling of buildings rather than their demolition and replacement. Full consideration should be given of the lifetime cost of the new building as against the old, including the construction/ demolition impact in the calculations.</p> <p>Having all four options for strategic waste sites in the Lower Aire Valley means that there is an on-going commitment to carrying waste across the city to this location for processing. Question whether there should be other locations around the city for more local treatment.</p> <p>Does not identify any locations for waste sites in North and West Leeds. Additional, appropriate locations should be sought in this area.</p>	<p>Most demolition is permitted development. The CS require BREEAM and Code for Sustainable Homes standards to be met, which indirectly encourages the reuse of buildings.</p> <p>Safeguarded sites are located throughout the city. Areas of search on existing industrial sites have also been identified for this purpose. Comment noted</p>	Work on-going to accurately record and review existing waste sites.
037	Les Morris	National Grid	<p>The consultation document identifies the following potential minerals and waste sites which are crossed by National Grid's high voltage overhead electricity transmission lines:</p> <p>§ Site 08: Extraction site § Site 35: Mineral Safeguarding site § Site 65: General Waste site § Site 103: General Waste site § Site 171: Existing Landfill site</p> <p>National Grid does not object to the proposals outlined, however the following points should be taken into consideration.</p>	Points noted	None

			National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential operators of the sites should be aware that it is National Grid policy to seek to retain our existing overhead lines in-situ because of the strategic nature of our national network. Developers and planning authorities need to consider the location and nature of existing electricity transmission equipment when planning a development.		
038	Malcolm Ratcliff	Minerals Products Association	Supports Preferred Policy Position – Waste 4: Providing Self Sufficiency for C&DE Waste, however, self-sufficiency also involves providing for the disposal to landfill of residues after recycling. Council’s Preferred Policy Position – Waste 11: Landfill Disposal Object to the presumption against new landfill provision within the LCC area.	There is adequate approved landfill capacity for the plan period.	None
40	Kevin Parr (Enzygo) (Agent)	Mr Rod Mordey, Rockspring Hanover Property Unit Trust	We wish to put forward two sites within Thorp Park Trading Estate owned by our client, for inclusion in the Natural Resources and Waste Development Plan Document as part of the Leeds Local Development Framework: - Land know as “Westminster Yard” , centred at NGR SE 444 462 (444410, 446235), is located to the west of Thorp Park Trading Estate. The proposed site covers an area of 5.8 hectares and lies immediately to the north of Avenue B of the Estate. - Land located immediately to the south of Westminster Yard , centred at NGR SE 445 460 (444600, 446100). The proposed site covers an area of 8.8 hectares and is bounded by Avenue B to the north, Street 3 to the east, Avenue D to the south and Street 1 to the west.	Comments noted	Further work to be carried out to assess the site’s suitability.
45	Rachel Wigginton	GOYH	Para 7.8 A zero waste vision is not realistic. PPS10 sees disposal as the last option, but one which must be adequately catered for and refers to a need to plan for the disposal of the residues from treated wastes. Para 16 of the PPS requires LDFs to ensure there are sufficient opportunities for the provision of waste management facilities in appropriate locations including for waste disposal. Para 7.12 The document does not demonstrate that cross-boundary waste management options have been sufficiently considered. It is possible that sharing facilities could be the best option in parts of the District, including in relation to strategic waste facilities. Para 7.19 Relevant saved policies should be replaced in this DPD. Para 7.20 Reference is made to The Site Selection Study 2007 and Update	Zero waste is a worthy aspiration of the Council’s Integrated Waste Strategy, which we are required to acknowledge. The emphasis within the guidance is on self-sufficiency but there is strategic provision for treating CDE and CI wastes. There is no RSS guidance on this issue. Agree	None None Review UDP Saved Policies and incorporate into this

			<p>Addendum 2009 in relation to the selection of potential waste management facilities. Such an assessment and rejection of alternatives should be part of this DPD. The authority will need to justify at examination that the proposed sites are the best alternatives with supporting evidence that has been consulted on. All sites that have been considered should also have been subject to SA.</p> <p>Para 7.28 See comments under para 7.8. The DPD should still plan for the disposal of the reduced residues to landfill. A policy is still needed for residual landfill from all waste streams.</p> <p>Para 7.71 See comments under para 7.20. It is understood that other sites have been assessed and rejected, but this needs to be more upfront in the LDF with adequate justification of why these sites have been chosen and others rejected. The authority will need to be able to show that shared facilities with adjoining authorities have been adequately considered in this assessment.</p> <p>The Aire Valley is a preferred location for an urban eco-settlement in the Leeds City Region. This presents both challenges and opportunities for these potential waste management sites in the Aire Valley. PPS1 Eco-town supplement refers in paragraph ET19 to eco-towns planning for sustainable waste and resources, covering both domestic and non-domestic waste. This would set higher targets for dealing with waste and consider the use of locally generated waste as a fuel source for combined heat and power generation. The proposed facility needs to be fully embedded within the emerging eco-settlement proposals and explain the linkages to the Aire Valley AAP and masterplan.</p> <p>PPP – Waste 11 Object. See comments under para 7.8. PPS10 sees disposal as the last option, but one which must be adequately catered. In this context we do not consider that a presumption against landfill is acceptable.</p>	<p>SA/SEA considerations were used to short list the sites during the study. Advice from PINS, is that it is not necessary to SA the long list of sites (>1000 sites), only those that are going forward within the DPD.</p> <p>There is adequate approved landfill capacity for the plan period.</p> <p>There are commercial facilities dealing with cross boundary waste.</p> <p>Comments Noted</p> <p>The DPD is locally specific, Leeds has more than sufficient landfill capacity for the plan period.</p>	<p>DPD where appropriate.</p> <p>Work is on-going to progress the Urban Eco-Settlement by the City Council.</p>
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046	Angela Flowers	North Yorkshire County Council	<p>Preferred Policy Position - Waste 1: self-sufficiency for Future Waste management in Leeds - Paragraph 7.15 of the policy position document recognises the regional role of Leeds and the potential role of facilities within Leeds to serve a wider catchment beyond the City boundary. Whilst this recognition is welcomed, it does not appear to be fully reflected in the policy. This indicates that Leeds will work with sub-regional partners to achieve a net balance of waste management facilities across West Yorkshire.</p> <p>The approach should recognise the role that facilities within Leeds could play in serving needs arising within the wider Leeds City Region, including those parts of the LCR within North Yorkshire.</p> <p>The policy position document does not appear to address any potential requirements for the management of low level radioactive waste arising from non-nuclear industry. It is likely that some such wastes arise within Leeds and consideration should be given as to how they are to be managed. Such an approach would be in accordance with the Planning Inspectorate document: Examining the Soundness of Minerals and Waste Policies in Core Strategies (PINS 2009).</p>	<p>The NRWDPD does actually say this.</p> <p>We acknowledge this point, in Leeds this is mainly hospital waste.</p>	<p>None</p> <p>Formulate approach and draft text.</p>
049	Barton Willmore (agent)	John Wignall, Towngate Estates Ltd	<p>Objects to wording in paragraph 1.10 - amend to a more "deliverable" aim.</p> <p>P7.65-7.73: supports approach. P7.78: support need for flexibility.</p> <p>PPP10: fourth bullet point needs amending to reflect the table on P61.</p>	<p>LCC intends to aim high in achieving quality of life for people.</p> <p>Support welcomed.</p> <p>All saved policies will be reviewed .</p>	<p>None</p> <p>Review Saved policies and incorporate where appropriate.</p>
050	Sophie Taylor (Agent)	Britannia Refined Metals Limited (BRM)	<p>Object to the proposed 'safeguarding' designation (C1) site reference no. 93. Site should be removed from the NRWDPD.</p> <p>Site Closure - The site was previously used by BRM for the collection and recycling of lead acid batteries. The factory closed in 2002 and has since been cleared and secured. The adjoining land to the west of the BRM site was used for associated car parking for the BRM site and is also now vacant. The site was actively marketed by Knight Frank as an existing industrial use, but there was no successful interest. Given the site has been cleared and there has been no market interest in the site, there is no need to safeguard the site for such a use.</p> <p>The BRM site had operated as a lead refinery for approximately 40 years. The site was used for taking material feedstock such as scrap lead, lead-by-products and scrap batteries, which were smelted and refined to produce lead ingots and recycled polypropylene. A Phase II Site</p>	<p>Site to be safeguarded for waste uses as it has not been demonstrated to the Council that the site is not needed for waste.</p>	<p>Work is on-going to ascertain overall land take for future waste needs.</p>

		<p>Investigations report revealed considerable levels of contamination of soils by lead (and other metallic contaminants associated with lead). Although minor, there is also evidence of impact from lead and antimony in water samples. The costs of remediation could be in excess of £2,000,000. BRM is committed to ensuring the site's successful remediation and does not feel that this could be guaranteed by a waste management operation.</p> <p>The site identified on Plan 93 does not fully fall within the ownership of BRM. The western section falls within a separate ownership. Issues of landownership are likely to be a constraint in bringing the site forward as one and this would prevent the site's delivery as a waste management facility.</p> <p>The site is adjacent to a recently developed residential estate, which was granted planning permission in 2005. The residential development is part of a wider mixed use proposal for site allocated as E4.40, and demonstrates that there is already a move away from heavy industry to residentially led mixed use development around the BRM site. A waste management facility would not site easily next to these other uses, and could hinder further development and industry in the vicinity.</p> <p>Waste management facilities, should in accordance with UDP Policy WM1 demonstrate that the need of the facility outweighs the harm that might result and is consistent with the principles of sustainable development. The use of the BRM site for a waste facility would cause great harm on nearby residents and given the number of other more suitable sites available (identified on Map C1), there does not appear to be a case that the need would outweigh the harm in this instance.</p> <p>BRM's Development Intentions - BRM commenced pre-application discussions with the Leeds Planning Authority in June 2009 regarding the residential redevelopment of the site. Detailed discussions have taken place regarding the principle of the site's development and much work has been undertaken to demonstrate its sustainability. This work is ongoing and is likely to culminate in an application for planning permission within the next six months. Given the stage of the pre-application discussions and pending planning application, it is very unlikely that a waste management facility will be deliverable at this site and a planning permission could be in place before the final NRWDPD is in place.</p> <p>The site is surrounded by Green Belt to the north, east and south east. The eastern section of the site identified on Plan 93, within the ownership of BRM falls within Green Belt. It is considered that such a use (waste management) would not be an appropriate development in the Green Belt and would conflict with policies contained within PPG2 Greenbelts and UDP Policy N33. Given the number of other sites identified as</p>	<p>Leeds has not made any commitment to residential development on the employment site.</p>	
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			'safeguarded' it does not appear that there is a shortage to justify that 'special circumstances' exist.		
052	Nicole Harrison (Arup – Agent)	Aire Valley Environmental- AVE	<ul style="list-style-type: none"> • Supports self-sufficient future waste management • Supports self-sufficiency for MSW • Supports achieving self-sufficiency from C & I waste Policy 6 sewage sludge mention of Knostrop to explore synergies of co-processing msw and C&I and water treatments. Implementation will help achieve these aims	Support Welcome	None
053	Martyn Coy	British Waterways	Policy Waste 7 - Support the safeguarding of dredging sites at Thwaite Mill (LDF doc. Ref 167) and Woodlesford (LDF doc. Ref 172).	Support Welcome	None
	Colin Holm	Natural England	Preferred Policy Position – Waste 1: Self sufficiency for Future Waste Management in Leeds' Given that a number of the potential urban sites are on previously developed land, which can form an important habitat for a range of species (and may support the UK BAP habitat 'open mosaic habitats on previously developed land') appropriate ecological surveys, as well as assessment of impacts on townscape character and on public rights of way, should be required.	Support Welcome	None
058	Mary Keynes	Impact Residents Network	Object to incineration of waste for the following reasons; expense, dangerous emissions; demand of large incinerators for a steady supply of waste will discourage waste prevention and recycling.	DPD is technology neutral.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
059	Ed Carlisle	Together for Peace	Not convinced about waste incinerators. Suspect using unused quarries for landfill is maybe the lesser of two. Commission a major piece of public art made out of waste similar to the WEEE Man at the Eden Project in Cornwall – www. weeman.org Council waste sites need to include for more waste refuse. Supportive of gradually decreasing bin pick ups. In the long term giving whole streets communal bins might enable people in neighbourhoods to hold one another to account around waste reduction and act more cooperatively.	DPD is technology neutral. Comments noted	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.

063	Matt Naylor	Yorkshire Water	<p>YW supports the overall approach to planning for new waste management facilities and the aim to identify strategic sites, in particular identifying sites where co-location is appropriate.</p> <p>Yorkshire Water supports the inclusion of Strategic Sites 2 and 3 as potentially suitable waste management sites. Areas of land within Knostrop Waste Water Treatment Works will be available and suitable for development as waste management facilities, particularly given the benefits of co-locating waste uses (see above) and preferred policy Waste 6.</p> <p>The boundary on the Knostrop site (Site 3) needs a slight amendment to fully represent the area of land available for a strategic waste use. This has been attached as a separate document.</p>	<p>Support welcomed.</p> <p>Support welcomed.</p> <p>LCC understands that this comment is made in error.</p>	<p>Review boundaries.</p>
065	Mr. Zulfiqar Ali	Environment Agency Y&H	<p>Support the vision and objectives of the document and welcome the close tie in with tackling climate change.</p> <p>Waste 1: Self sufficiency for future waste management in Leeds Add a commitment to work with neighbouring authorities on specific waste streams in order to achieve the highest levels of resource recovery for the region. Also need to include reference to the benefits of sharing information and experience of new waste technology.</p> <p>Waste 2: Providing self sufficiency for MSW The chosen solution must extract the most value from waste and should be flexible enough to accommodate advances in technology and changes in waste composition.</p> <p>Waste 3: Achieving self sufficiency for C & I waste There should be a presumption that any increased capacity for Commercial Industrial waste will drive the management of that waste up the hierarchy.</p> <p>Waste 4: Providing self sufficiency for C&DE waste Support. More provision is required to prevent valuable materials being landfilled. In order to increase recycling and reduce fly tipping there should also be some offsite provision suitable for small builders.</p> <p>It should also be a priority to reduce and reuse construction waste on site through the use of sustainable construction methods and site waste management plans.</p> <p>Incorporate a policy which promotes sustainable construction and building design which encourages and facilitates waste segregation. The need for</p>	<p>Support welcomed.</p> <p>There are commercial facilities dealing with cross boundary waste. Leeds has made a commitment to working with neighbouring authorities (see Waste 1).</p> <p>DPD is technology neutral.</p> <p>There is an inevitability about this in any event.</p> <p>Agree</p> <p>Covered in Core Strategy and Sustainable Construction SPD</p>	<p>Work on-going.</p> <p>The City Council's Waste Management Section are considering a scheme for small quantities of waste for small builders.</p> <p>Improve links between documents.</p>

			<p>Site Waste Management Plans could also be included within the policy.</p> <p>Agricultural Waste - Some types of agricultural waste are being dealt with on farms, and that there is increasing interest in anaerobic digestion and composting for dealing with slurries and vegetable waste. Some more enterprising farmers are looking at the possibility of bringing in wastes from the food processing industry to make the investment in new treatment technology more cost effective. Criteria based policies which recognise the impacts of these types of technologies could be useful.</p> <p>Other types of agricultural waste such as packaging, scrap metal and construction waste are more likely to be dealt with off farm as commercial industrial waste.</p> <p>Waste 5: Hazardous Waste Agree that hazardous waste capacity should be maintained and that special provision may need to be made for the remediation of contaminated sites so that they can be brought back in to use.</p> <p>Waste 7: Safeguarded Existing Waste Management Sites No objection to the safe guarding of waste management sites unless there is a proven environmental reason which cannot be mitigated through other means.</p> <p>Waste 8: Strategic Sites for Waste Treatment The suitability of the four strategic sites is dependant to a large extent on the chosen technology, and its environmental impacts. It has not been made clear whether there are circumstances where all four sites would be developed. For some technologies the cumulative effect of emissions and also cooling water availability may be a limiting factor and this should be explored as early as possible.</p> <p>It is important for Leeds to take responsibility for its own waste but applications should also be considered in a regional context.</p> <p>PPS10 Support - An emerging issue over the past 12 months has been the disposal or further treatment of the outputs from Mechanical Biological Treatment and Autoclave type facility commonly referred to as compost like output or in some cases refuse derived fuel. These outputs remain waste and as such require waste permits for their onward treatment or disposal. They cannot be spread to land without authorisation or burned for energy</p>	<p>Noted but taking urban waste into the green belt is not consistent with sustainability principles.</p> <p>Noted</p> <p>Comment welcomed. There is a regional and sub-regional shortage of hazardous waste capacity.</p> <p>All sites have been assessed for their environmental impact and only safeguarded where there is no conflict.</p> <p>Disagree. All four strategic sites are potentially suitable for any technology. Cumulative effects will be assessed in the SA.</p> <p>Agree.</p>	<p>Work on-going to establish accurate data.</p>
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			<p>except in a Waste Incineration Directive (WID) compliant incinerator. Productive outlets for these residual wastes need to be planned for alongside the proposals for initial treatment.</p> <p>Waste 9: Waste Uses within Existing Industrial Areas A well run waste facility is suitable for most industrial areas. Existing buildings can be used, however, where potentially odorous wastes are being handled there may then be problems with the effective employment of modern negative pressure odour control technologies.</p> <p>Waste 11: Landfill Disposal Agree that landfill is a last resort and any requirement for further capacity should be assessed on this basis.</p>	<p>Noted. The DPD is providing a range of sites for waste and is technology neutral.</p> <p>Support welcomed. Potential for odour problems will be assessed as part of any relevant planning applications.</p> <p>Support welcomed.</p>	
072	Nicholas Howarth	Howarth Timber	Knostrop Sewage Works should become the location for new waste treatment facility as it is more remote from both residential areas and heavily occupied commercial sites.	Support welcomed.	
074	Diane Gill	Save Our Homes	Object to Wholesale Market site as location for incinerator.	DPD is technology neutral.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.

075	Nicola Bell of Scott Wilson (agent)	PPL Revera	<p>The spatial principles outlined in Preferred Policy Position – Waste 1: Self sufficiency for Future Waste Management in Leeds and Waste 2: Providing Self Sufficiency for MSW to enable Leeds to meet its own waste management needs are supported.</p> <p>The ‘Future MSW Capacity Requirement at 2026’ table (pg 46) identifies a need for green waste composting facilities to deal with an additional 64,000 tonnes per annum, a new processing facility for organic waste streams of Municipal Solid Waste (MSW) to treat 45, 000 tonnes per annum through a Anaerobic Digestion or In-Vessel Composting facility. There is also an identified need for new facilities to deal with Commercial and Industrial Waste and Construction, Demolition and Excavation Waste. Whilst it is acknowledged that large strategic sites (such as those identified on Maps E and F) are required to enable Leeds City Council to plan effectively, this should not prevent localised waste facilities coming forward that could appropriately serve immediate communities and reduce travel between source and process. Parlington Estate is promoted as having the potential to accommodate such facilities given its location adjacent to the J47 of the M1.</p> <p>Preferred Policy Position – Waste 10: Future Waste Use Proposals - Support.</p> <p>Support the retention of UDP saved policy WM7 which supports composting and recognises that there may be circumstances where this activity may take place in Green Belt. It is suggested that the Parlington estate could provide centralised waste to energy facilities for the nearby settlements of Garforth, Barwick-in-Elmet and Aberford, to assist with creating self-sufficiency of their localised waste stream, as part of wider renewable energy proposals.</p>	<p>Support welcomed.</p> <p>The strategy is to provide waste facilities in accordance with PPS10. ie. on industrial land which is appropriate for such uses.</p> <p>Green waste composting needs to be assessed on a specific basis depending on the type and scale of the process.</p> <p>Support welcomed.</p> <p>It is intended to review Saved Policies and where appropriate incorporate these into the DPD.</p>	<p>Review policy position to provide locational criteria.</p> <p>Review and incorporate appropriate saved policies into DPD.</p>
080	Dan Walker, David L Walker Ltd.(agent)	David Atkinson, Lafarge Aggregates Ltd	<p>Objects to the principle of safeguarding existing sites and the strategic waste sites as all potential sites should be considered on an individual basis and specific planning merits. Section 7 needs further consideration in regards to recovery aspects of inert waste.</p>	<p>This is contrary to the Development Plan led planning system set up by Government.</p>	<p>None.</p>

081	Lisa Morris		<p>Does not think the incinerator should be built next to residential housing like the Wholesale Market Site.</p> <p>Supports approach to safeguarding existing sites and the strategic waste sites.</p>	<p>Objection noted.</p> <p>Support welcomed.</p>	
082	David Blackburn	LCC Councillor (Farnley Ward)	<p>Waste Policies 3 & 4 - Providing Self Sufficiency for C&DE Waste and Waste Policy 9 -Waste Uses Within Existing Industrial Areas</p> <p>(Question 16) - Of the 5 sites proposed under Para. 7.81, 7.42 and 7.47(Policy Position) object to extension of Ashfield Industrial Estate and Far Royds 'F' Sites (Ashfield Ind. Est. is at the back of Cobden Primary).</p> <p>Object to extension of Site No. 140 Ashfield Way (McHugh Plant) or Site No. 145 Ashfield Way (Mone Bros) 'C2'.</p> <p>Waste Policy 7 - Safeguarded Existing Waste Management Sites</p> <p>Para. 7.64 – Object to extension of Site No. 140 Ashfield Way (McHuch Plant) and Site No. 145 Ashfield Way (Mone Bros).</p> <p>Object to use of Site No. 194 Upper Wortley Road (Matthews) 'D' Site as it is an eyesore and near a residential area and entry would cause a traffic problem.</p>	<p>Objections noted.</p> <p>These sites are proposed for retention as important existing sites, some have potential for intensification and extension but would only be allowed if environmental circumstances allow.</p> <p>This is an existing site which it is NOT proposed to safeguard.</p>	<p>Work is on-going to accurately assess whether we are meeting our waste requirements.</p>
084	Gavin Fernley	Blackshaw Holdings	<p>The owners object to safeguarding Carr Croft MRF Site 58 due to its town centre location. It is not an appropriate use at this location and its present operation is proving difficult. Suggests safeguarding St Bernard's Mill (ref 141) as has recent planning permission for a MRF.</p>	<p>Site to be safeguarded for waste uses as it has not been demonstrated to the Council that the site is not <u>needed</u> for waste.</p> <p>St. Bernard's Mill is already safeguarded for aggregate recycling purposes.</p>	<p>Further work will be carried out to assess the potential for the alternative site put forward. If it is acceptable as an alternative MRF site then there will be a need to find an alternative aggregate recycling site as the suggested alternative is currently used for this purpose.</p>

085	Ann Blackburn	LCC Councillor (Farnley Ward)	<p>Waste Policies 3 & 4 - Providing Self Sufficiency for C&DE Waste and Waste Policy 9 -Waste Uses Within Existing Industrial Areas</p> <p>(Question 16) - Of the 5 site proposed under Para. 7.81, 7.42 and 7.47(Policy Position) Object to extension of Ashfield Industrial Estate and Far Royds 'F' Sites (Ashfield Ind. Est. is at the back of Cobden Primary).</p> <p>Object to extension of Site No. 140 Ashfield Way (McHugh Plant) or Site No. 145 Ashfield Way (Mone Bros) 'C2'.</p> <p>Waste Policy 7 - Safeguarded Existing Waste Management Sites</p> <p>Para. 7.64 – Object to extension of Site No. 140 Ashfield Way (McHuch Plant) and Site No. 145 Ashfield Way (Mone Bros).</p> <p>Object to use of Site No. 194 Upper Wortley Road (Matthews) 'D' Site as it is an eyesore and near a residential area and entry would cause a traffic problem.</p>	<p>Objections noted.</p> <p>These sites are proposed for retention as important existing sites, some have potential for intensification and extension but would only be allowed if environmental circumstances allow.</p> <p>This is an existing site which it is NOT proposed to safeguard. Category D sites are NOT safeguarded.</p>	Work is on-going to accurately assess whether we are meeting our waste requirements.
086	Lionel Sykes		<p>Keep waste sites away from any water treatment plants.</p> <p>I do not agree with your selection for strategic sites. Sites should be near 'A' roads/motorways to keep costs down.</p> <p>Do not support discouraging landfill, as long as it is carried out correctly, efficiently and economically</p>	<p>Noted</p> <p>Agree to point regarding good access links.</p> <p>Leeds has sufficient landfill sites to meet the need for the plan period and therefore there is no need to allocate new sites.</p>	None, all 4 proposed strategic sites have good access to the motorway network.
087	Alan Broadbent		<p>Supports approach to safeguarding existing sites and the strategic waste sites.</p> <p>Need to move away from land fill sites as quickly as possible by improving recycling centres. Leeds is not organised to do this</p>	Support welcomed.	None.
088	Mike Harty	Biffa Waste Services Ltd	<p>Supports approach to safeguarding existing sites and the strategic waste sites.</p> <p>AD is the preferred choice.</p>	Support welcomed. DPD is technology neutral.	None.
091	FM Lister (Trustees)	Henry Hudson (deceased) estate	<p>Supports approach to safeguarding existing sites and the strategic waste sites.</p> <p>Considers that landfill still required. Early site identification will be better policy</p>	Support welcomed. <p>Leeds has sufficient landfill sites to meet the need for the plan period</p>	None.

092	Mrs Kenna		Not all the strategic sites should be in LS9, questions spatial vision	The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
093	Mr Kenna		<p>Suggests a site in NW Leeds as a strategic site or join with Bradford area</p> <p>Suggests moving strategic sites further out of an already over-extended Leeds area. Go NW.</p> <p>Suggests industrial estates for waste in Pudsey, Guiseley or even out towards Wetherby.</p> <p>Supports filling in sites away from densely populated areas as these will not be potentially as harmful to quality of life of local people.</p>	<p>The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.</p> <p>DPD provides a range of sites across the District, including industrial estates.</p>	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
094	Mrs Ann Slater		<p>Supports safeguarding waste sites in industrial areas away from residential.</p> <p>Does not support strategic waste sites as they are too close to homes.</p> <p>Only supports landfill when a proven need is established.</p>	Comments noted.	None.
95	Mr R D Taylor		<p>Protests to increased recycling separation at home (due to space and smell).</p> <p>Objects to incineration (due to proximity)</p>	<p>Increased recycling is necessary in order to reduce the amount of waste.</p> <p>This DPD is technology neutral.</p>	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.
100	Mr K L Townend	Saves Our Homes and The Environment	Asks why all sites are near them. Already much noise/pollution from existing infrastructure and industrial.	The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of

					the residual waste project.
101	Mrs G Townend	Saves Our Homes and The Environment	Asks why all sites are near them. Already much noise/pollution from existing infrastructure and industrial.	The general location has been found to be the most suitable location in the District for strategic sites as it is an industrial area with good road connections.	The City Council via the Waste Management Service, is continuing to liaise with a wide range of stakeholders (including local residents) as part of the residual waste project.