

# LEEDS LOCAL DEVELOPMENT FRAMEWORK

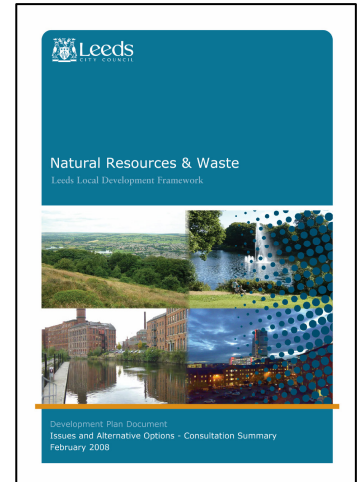
## Natural Resources and Waste

## Development Plan Document

## Issues and Alternative Options

**8 May – 19 June 2008**

This questionnaire asks for your views on the Leeds Natural Resources and Waste Issues and Alternative Options Development Plan Document produced by Leeds City Council and their partner consultant – Jacobs in 2007 and provides you with the chance to inform the Council's proposals laid out in the document, or suggest alternatives.



This document will make up one part of the Local Development Framework (LDF), which sets out policies and proposals to guide development in Leeds. Its focus is on natural resources and waste to help deal with the wider challenges of Climate Change.

**A copy of the Consultation Summary to help assist with the completion of this questionnaire is available should you require more in-depth information.** You can access this document in four different ways:

Visit your local library or One Stop Centre and ask for a copy  
Visit us online at [www.leeds.gov.uk/ldf](http://www.leeds.gov.uk/ldf)  
Email [nrwdpd@jacobs.com](mailto:nrwdpd@jacobs.com) or  
Call 0113 242 6771

Help is also available for those with visual or physical impairments and for those who require the documents or questionnaire in another language please contact 0113 242 6771

Please complete the following sections:

Male

Female

Age Group (Under 16, 16-20, 21-30, 31-40, 41-50, 51-60, Over 60)

Consultation forms **must** include a name and address otherwise your comments will not be taken into account.

Your details

Title.....  
 Name.....  
 Organisation  
 (where relevant).....  
 Address.....  
 .....  
 .....  
 .....  
 Post Code.....  
 Telephone/Mobile.....  
 Email address  
 (optional).....

If the details opposite are for an agent, enter  
 the client's details here:

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**Please return your completed questionnaire by 5pm on Thursday 19<sup>th</sup> June 2008 for your views to be taken into consideration to:**

**FREEPOST RLSB-BTYC-UKUT, Natural Resources and Waste Development Plan Document, Jacobs UK, 1 City Walk, Leeds, LS11 9DX**

*Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the Data Protection Act 1998 the personal information you provide will only be used by the Council for the purposes associated with the LDF consultations*

**If you would like to provide additional comments and require more space, clearly mark which question you are referring to and continue at the end of the questionnaire or on a separate sheet.**

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1. This Natural Resources and Waste Development Planning Document (NRWDPD) includes the following as key themes.

Please rank these themes in order of importance for Leeds with 1 being the most important and 6 being of least importance to you.

If you do not think that a theme should be included in the NRWDPD, please do not include this within your ranking.

Section	Theme	Rank
A	Waste	
B	Minerals and Aggregates	
C	Energy & Climate Change	
D	Land-Use	
E	Water Resources	
F	Air Quality	

If you feel there are any further themes that you think should be included, please provide your comments below.

## Waste

The Government has set ambitious targets for reducing the amount of waste sent to landfill by recycling and composting. The DPD will help develop waste management policies designed to meet these targets. The challenges are:

- Developing initiatives to increase and encourage recycling
- Deciding whether to safeguard existing and future waste sites within the Leeds area
- How to encourage cross-boundary working with neighbouring authorities to plan for the location of future waste sites in the region

### Key Issues

- How to ensure that facilities are available to manage all types of waste
  - How to ensure that waste is managed on the site where it arises, or at the nearest location
  - How to determine where future waste management sites are located
2. Leeds is part of a wider City Region. The Council may need to consider opportunities within the City where it might be possible to meet more than just local needs.

Which of the following options do you think is the most appropriate for Leeds as a city? (please tick)

Options for Planning for Future Waste		Yes	No
1	Leeds should plan for managing its own waste only		
2	Leeds should work with neighbouring authorities to ensure a strategic approach to managing waste		
3	As part of its City Region role, Leeds should be considered as a strategic location, capable of serving a wider area		
Why do you say that?			

3. The number of waste facilities for treatment, recycling and recovery may need to double by 2020 to provide more sustainable waste management.

Which of the following options do you feel would be most appropriate for Leeds as a city?

Options for Location of New Waste Management Facilities		Yes	No
1	Make provision for one or two larger sites where major waste facilities for all waste can be located together?		
2	Identify alternative sites distributed around the City to provide a range of options?		
3	New facilities should only be provided in existing industrial, landfill or waste management sites or other less sensitive areas away from residential, business parks or other such sensitive areas to new waste management activity.		
Why do you say that?			

4. There may be instances where new waste management proposals are required in a certain location as this is closest to the source of waste.

Which of the following options do you feel will achieve a balance between managing waste close to its source and environmental protection for Leeds?

<b>Options for Other Locational Considerations</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Reflect national planning guidance even in local circumstances where this might restrict certain waste management activity?		
<b>2</b>	As far as possible reflect national planning guidance but seek to achieve a practical balance between the environmental protection need to reflect local circumstances and the specific location needs of certain waste management facilities		
Why do you say that?			

5. Leeds City aspires to 'zero waste', however during the transition to this there is a potential need for additional landfill provision for waste that cannot be re-used, recycled or recovered.

In light of this, which of the following options do you agree with for Leeds?

<b>Options for Landfill Provision</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	If possible, only identify extensions to existing landfill sites and backfilling of former minerals deposits		
<b>2</b>	Make provision for additional locations for landfill		
<b>3</b>	Rely on landfill provision outside Leeds		
Why do you say that?			

6. To increase and encourage recycling, the Council already operates a network of household waste sorting sites. The number of sites will have to be increased to continue recycling and to meet recycling targets

Which of the following options do you think would be most suitable for Leeds?

<b>Options for Increasing Recycling</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	The Council should focus on supporting and encouraging further development of household waste sorting sites, in locations to serve different parts of the city		
<b>2</b>	These household waste sorting sites should be complimented by a broader network of smaller local facilities		
<b>3</b>	The Council should also provide policies which seek to encourage all developers to provide appropriate re-use and recycling opportunities when considering development proposals before, during and after construction		
Why do you say that?			

7. This policy document will identify specific sites for waste but this will prevent these areas from being developed for similar activities e.g. industrial development. It will provide certainty for waste management activity but could stifle investment and other opportunities. Waste management allocations are reviewed at least every five years.

To safeguard potentially needed sites, which of the following options do you think would be most appropriate for Leeds as a city?

<b>Options for Safeguarding Waste Sites</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Providing a 'protected' status for existing and future waste sites so that their status can only be changed through a review of the DPD		
<b>2</b>	A more flexible approach should be taken where the need for other uses may be acceptable		
Why do you say that?			

## Minerals and Aggregates

Minerals and aggregates such as stone, sand and gravel are a primary resource used in the construction of buildings and infrastructure. The rate of extraction and level of consumption has significant environmental effect at local and regional level. The Council acknowledges its duty to encourage the production of secondary and recycled aggregates within the district to help meet local demand without excessive use of primary resources.

The DPD considers policies such as:

- The need to safeguard mineral deposits and provide for the supply of minerals
- How to maximise the use of aggregates, and or to undertake primary extraction as needed; and
- The need to provide for sub regional apportionments and maintain land for all significant minerals.

### Key Issues

- How can Leeds improve its contribution to regional aggregate provision and reduce its reliance on aggregates imported from neighbouring districts some of which are designated as National Parks and Areas of Outstanding Natural Beauty (AONB)?
- If greater use of aggregates is to be made in order to reduce the need to import fresh material, how can Leeds ensure that there will be adequate processing facilities in the most appropriate locations?
- Finally, restoration of sites, which may involve ‘backfilling’ that is, using vital secondary materials to refill a trench or excavation with the soil dug out of it and the introduction of new types of use e.g. sites restored to leisure uses involving water with improved biodiversity can contribute to the desired reduction of finite resources across the district and region.

8. The required aggregate provision for each authority within West Yorkshire has been agreed up to 2016, but is not yet agreed up to 2021. What policy approach should Leeds take on the levels of aggregate extraction for this period?

Options for Aggregated Provision		Yes	No
<b>1</b>	A continuation of the 2001 – 2016 trends should be accepted as the basis of future aggregate provision		
<b>2</b>	Higher levels of one or both of the figures should be considered to reduce the need for primary aggregates produced in the National Parks and AONBs of North Yorkshire in line with RSS policy		

9. If there is a need for additional quarrying of sand and gravel resources over the Plan period do you think this would be best achieved by:

Options for Sand and Gravel		Yes	No
<b>1</b>	Extensions to existing quarries to supply the bulk of the required resources		
<b>2</b>	The release of new sites to supply the majority of this need		
<b>3</b>	Using existing allocations and a criteria based policy approach without identifying new sites for development		

10. Government guidance encourages any additional available resources to be clearly defined, so as to assist **all** stakeholders. Do you think the identification and release of additional resources would be best achieved by:

<b>Options for Sand and Gravel</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	The identification of broad areas of search		
<b>2</b>	The identification of preferred areas within these search areas		
<b>3</b>	The identification of additional site allocations with detailed boundaries to be defined in the Development Plan Document		
<b>4</b>	Not identifying any preferred area or site allocations, but instead using a criteria based policy approach, applicable across the whole district		
<b>5</b>	Looking for preferred areas or site allocations outside the existing resource areas		

11. There are environmental impacts of sand and gravel extraction, particularly on specific areas of the district. Given this, which of the following options do you think is best for local areas?

<b>Options for Sand and Gravel</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	To place clear limits upon further sand and gravel extraction in resource areas due to the aforesaid environmental impacts and to help prevent further impact		
<b>2</b>	To identify and consider other potential resource areas		
<b>3</b>	To focus on the current rates of extraction, with regards to regional guidelines that cover the distribution for West Yorkshire and also reflect Government policy		

12. Crushed Rock extraction and provision has never been included in previous development plans. Its extraction can have negative environmental impacts, and there is debate over the quality of this resource within the district. What is your view on the future of this resource?

<b>Options for Crushed Rock</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	No change should occur to the existing situation		
<b>2</b>	Clear criteria and new potential sites for future exploration should be designated		

13. Dimension stone and other building stone is considered to be a valuable resource, with quarries that produce this stone in operation for many years. Applications for new quarries are unlikely to occur, however there are options relating to this which are:

<b>Options for Building Stone</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	To designate known reserves of dimension stone as 'Mineral Consultation Areas' with an aim to protect this resource		
<b>2</b>	Allow existing quarries to meet increasing demand for this stone by permitting a preference for their extension		
<b>3</b>	Allow new quarries to be permitted		

14. National guidance on opencast coal mining has resulted in the council **opposing** this development, unless proposals can demonstrate clear beneficial effects and meet rigid criteria. In light of this, do you think the council should:

<b>Options for Coal</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Simply acknowledge the presence of the coal reserve and continue with its protective approach as set out in saved policies		
<b>2</b>	Designate locations as 'Mineral Consultation Areas' which would include criteria for future exploitation		

15. Allocating sites that are suitable for the manufacture of concrete based products are often difficult to locate within existing urban areas, although they play an important role in the development and Leeds' economy. Although they do not take up large sites they often have negative impact on the surrounding environment and are often unsightly.

National policy encourages the safeguarding of existing, planned and potential sites and suggests that future needs should be identified by policy documents.

Given this, do you think the council should:

<b>Options for Concrete Building and Asphalt Facilities</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Identify existing facilities and a range of additional sites which would be suitable for this or to use only in the future		
<b>2</b>	Include a safeguarding policy for existing sites, acknowledge the need for new sites and provide criteria and policies in order to help assess future proposals for these sites		
<b>3</b>	Provide policy guidance on appropriate locations such as existing mineral processing plants and industrial estates which already serve similar uses		

16. There is a difficulty compiling meaningful data relating to the production of recycled aggregates such as sand and gravel. Given the shortfall in meeting regional targets for recycling materials to use as aggregates, there is a need to encourage the establishment of recycling facilities to comply with national and regional guidance.

Please indicate which of the following statements you agree with concerning the preferred locations of aggregate recycling facilities:

<b>Options for Recycled Materials</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	On existing minerals sites, especially those that already import construction, demolition and excavation waste		
<b>2</b>	In former mineral workings with suitable hardstanding areas		
<b>3</b>	In appropriate industrial estate locations that are close to main sources of construction, demolition and excavation waste		
<b>4</b>	To continue encouragement of recycling initiatives generally, but also provide a policy that sets out criteria for assessing potential locations for these facilities		

17. In order to achieve desired after uses for sites, it is important that restoration designs are considered early in the planning process, as this many or may not involve the importation of fill materials. In order to reduce landfilling and to increase the recycling of materials, options for future restoration are varied.

Please indicate which of the following you agree with for Leeds as a city:

<b>Options for Recycled Materials</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	There should be a restriction on the backfilling of construction, demolition and excavation waste except in exceptional circumstances		
<b>2</b>	There should be an express preference for restoration at lower levels		
<b>3</b>	The most economic form of restoration should be allowed for quarry operators, providing they meet environmental requirements		

18. It is proposed that an approach is needed to provide a greater influence on the restoration and after-use of mineral sites, with an emphasis on landscape character and distinctiveness.

<b>Options for After Use</b>		<b>Yes</b>	<b>No</b>	<b>Rank</b>
<b>1</b>	A priority for the promotion of biodiversity			
<b>2</b>	A priority for woodland establishment			
<b>3</b>	A priority for the protection of valuable soil resources			
<b>4</b>	A priority for leisure and recreation after-uses			
<b>5</b>	To provide guidance on other possible after-uses, including disposal of residual waste			
<b>6</b>	Other open uses			
<b>7</b>	All of the above			

19. Looking back at priorities under Issue 18, there is a need for controls that ensure the management of appropriate after-uses for the longer-term. Options for future sites could include the options listed below. Please indicate which one you agree would be most appropriate and rank in order of preference with 1=most preferred:

<b>Options for Site Management</b>		<b>Yes</b>	<b>No</b>	<b>Rank</b>
<b>1</b>	The provision of a minimum 10-year management period for sites restored to nature conservation and woodland after-uses			
<b>2</b>	The provision of flexible long-term management periods for sites restored to nature conservation, where bio-diversity and / or management of recognised environmental assets are required			
<b>3</b>	The provision of a 5 year management period only, as currently allowed under aftercare provisions			

## Energy and Climate Change

Climate change is caused mainly by the emissions of greenhouse gases such as carbon dioxide and methane. Levels of these gases are increased by human activities such as energy production, waste stored in landfill and transport.

Impacts include hotter summers, wetter winters, less snowfall and increased flooding.

The region is a major provider of energy in the UK, but there are limited sources within the Leeds City Council boundary, so the city imports the majority of its energy.

### Key Issues

- What measures should Leeds be implementing in order for the area to positively combat climate change?
- What other sources of energy should Leeds be looking at in order to reduce reliance on fossil fuels?

20. To reduce reliance on fossil fuels, to reduce carbon dioxide and other greenhouse gas emissions, whilst meeting Leeds' energy requirements, which of the following options do you consider to be realistic?

For those ticked 'yes', please rank the options in order of preference, with 1 being the highest

Options for Primary Energy		Yes	No	Rank
1	Plan for and invest in renewable energy sources as a major provider for the city?			
2	Plan for and invest in Combined Heat and Power (CHP) and district heating as a major provider for the city?			
3	Plan for and invest in other energy sources as a major provider for the City?			
4	Continue to rely on fossil fuels energy production (this would potentially result in penalties for the City if emissions reduction targets are not met)?			
5	A combination of the above?			

21. Storage facilities for Oil and Gas need to be considered in safeguarding against disruptions to delivery of supply as demand fluctuates.

At this stage, consideration could be given to future provision storage facilities using existing geological features created by previous extraction

Options for Oil and Gas		Yes	No
1	Is there a need for policies specifically relating to storage of gas on the basis of local geological circumstances with areas that are potentially suitable for storage, if any, to be identified in the DPD?		
2	In the absence of preferred locations for gas storage, should there be additional policy designed to ensure the acceptability of any storage proposals that may come forward and incorporate measures to mitigate the potential environmental impacts of the proposed facility, in terms of both surface and sub surface works?		

22. Which of the following types of renewable energy technologies do you think are worthwhile and realistic to promote in Leeds for larger scale energy production? (Definitions are provided in the Glossary). (For those ticked “yes” please rank in order of preference, with 1 being highest)

Options for Renewable Energy Technology		Yes	No	Rank
1	Wind Turbines			
2	Solar Power			
3	Geothermal Technology			
4	Energy Reclamation from Waste			
5	Landfill Gas			
6	Biomass			
7	Hydropower			

23. Planning authorities should only allocate specific sites for renewable energy in plans where a developer has already indicated an interest in the site, confirmed that it is viable, and that it will be brought forward during the plan period.

However, research and consultation can be used to identify search areas and where negative effects will be minimal or can be addressed. Do you think that:

Options for Renewable Energy Technology		Yes	No
1	Research and consultation to be undertaken to provide spatial guidance on locations that are suitable for a particular type of renewable energy development? Or		
2	Policies to support renewable energy developments should be based only on meeting specified criteria?		
3	This document should contain a mixture of spatial guidance and criteria based policies?		

24. To lower carbon emissions, renewable energy generation should be provided in new developments. These should be subject to a certain percentage of renewable energy to be provided and on targets for reducing carbon emissions.

Should this be applied to all new developments or only on those over a certain threshold?

Do you think that the NRWDPD should provide an overall policy basis for supporting renewable energy development as an integral part of new developments?

Threshold Options for Mid-Scale Renewable Energy		Yes	No
1	No Threshold (all development)		
2	10 or more dwellings, or 1000m <sup>2</sup> of non-residential floorspace (or an area based equivalent)?		
3	A higher threshold (please specify)?		
4	Other		

25. If Leeds' is unable to produce significant levels of energy from renewable technology, would you support the Council collaborating with other agencies to provide more renewable energy sites in appropriate locations? (this may require incentives to partner authorities whose local characteristics mean that there is more potential to meet energy demands from renewable technologies)?

Yes	
No	

26. Micro-generated renewable technologies, (e.g solar panels, small wind turbines, heatpumps, biomass, Combined Heat and Power (CHP) and small-scale hydro-power) encourage local energy production in an environmentally friendly way Policies can be developed that either promote or require new developments to incorporate such technology where possible. Do you:

Options for Micro Generation		Yes	No
1	Agree with this and think this should be considered as a policy for all types of development in the NRWDPD?		
2	Agree with this but think that other DPDs to be prepared should each consider this issue separately in relation to the different types of development (e.g. housing, employment, retail) as there may be alternative solutions?		
3	Disagree with this approach and think that policies on micro- renewables should not be included?		

27. Do you have any suggestions for other micro renewable technologies that could be used in Leeds' other than those referred to in the previous issue?

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28. The Government is considering proposals to encourage more micro-renewable technology development in households and commercial uses by amending regulations so that less developments of this type will require planning permission. As part of this DPD preparation consultation process the Council can write to Government to offer support for this proposal, and if necessary incorporate such support into the text of the DPD. Do you agree with this approach?

Yes	
No	

29. Micro hydro generation refers to hydro power systems. Energy from falling water is used to generate electricity, and can be used for individual properties. The potential for this type of technology within the Leeds area needs to be investigated further. Do you think that:

Options for Micro Hydro Generation		Yes	No
1	The council should do nothing on this issue as it is likely to be of limited significance?		
2	The Council should appraise the potential for micro hydro power further for this NRWDPD?		
3	The Council should appraise the potential for micro hydro power further, but it would be more appropriate for different DPDs e.g. on Housing?		

30. There is the opportunity for neighbouring developments to improve their energy resource efficiency by working together, for example institutions obtaining waste water heat from nearby businesses. Do you think that this is something that should be investigated further in this DPD?

Yes	
No	

## Land Use

Land use is an essential component for development, but a finite resource. Within the Leeds area, the majority of land is classified as green space followed by domestic gardens. National and regional policy is for development to be located on ex-industrial (Brownfield) land.

Although Leeds currently exceeds this target, there are issues related to Brownfield land including unsuitable location, poor infrastructure and contamination. Within the urban area there is a good stock of vacant and derelict land that could be used for development, however, open space is limited. The DPD will provide some guidance on land use in the city.

### Key Issue

- How should the Council encourage regeneration and development of land that is contaminated?
31. To encourage regeneration and development of land that is contaminated, should the Council offer incentives for developments? These could include an agreement to prioritise processing applications for development on contaminated sites.

Yes	Additional comments:
No	Additional comments:

## Water Resources

Water is a scarce resource in England and Wales. By 2015, surface waters and groundwater need to meet 'good' ecological status. Within Leeds, the majority of river water is classified as good or fair according to the Environment Agency but further improvements are still needed.

Leeds also suffers from flooding, demonstrated by the floods of 2007. A review of all flood defences will be undertaken. Areas will be identified where existing drainage systems are under stress and lead to flooding.

To contribute to the better management of surface water drainage, Government policy requires efficient water installations, sustainable urban drainage, recycling used water and collection of rainwater for other uses.

### Key Issues

- How can Leeds improve its water quality and ensure adequate water supply and minimise use?
- How can Leeds improve its drainage infrastructure?

### Water Quality

32. The development and 'cleaning up' of brownfield sites close to water resources could help improve local water quality. This will need carefully managed and monitored to avoid adverse impacts.

Do you think it would be appropriate for the DPD policy to:

Options for Water Quality		Yes	No
1	Define sensitive areas where adjacent development will not be allowed, and identify the distance of an appropriate buffer zone, or		
2	Use criteria against which it must be demonstrated that a development will at minimum have no impact on water quality with mitigation measures, or		
3	Use criteria against which there must be a demonstrated improvement on existing water quality of any adjacent water resources.		

33. The flooding which occurred within Leeds in the summer of 2007 was largely as a result of existing inadequate drainage capacity.

Within Leeds an increasing number of gardens are being developed using impermeable surfaces under existing householder permitted development rights, which increases run-off and impacts on drainage.

Do you think it would be appropriate for Leeds to:

Options for Drainage		Yes	No
1	Remove permitted development rights across the Leeds City area for development using impermeable surfaces?		
2	Identify the areas of drainage stress and remove permitted development rights for development using impermeable surfaces <b>within these areas only</b> ?		

Do you know of any alternative ways of reducing the stress upon areas of inadequate drainage capacity?

34. Measures to improve water efficiency in new developments should be promoted e.g. grey water recycling schemes to utilise rainwater. The DPD could include policy that supports water efficiency in new developments. Do you agree with this?

<b>Options for Water Efficiency</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Yes, I think that the NRWDPD should promote water efficient developments		
<b>2</b>	No, I do not think that water efficient developments are an issue		

Are there alternative ways of improving water efficiency in new developments that you think should be included?

35. To minimise the loss of water resources and to protect good quality water, the concept of reducing, reusing and recycling water resources could be applied to new developments.

Which of options do you agree with?

<b>Options for Water Resources</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	This would be appropriate for all new development.		
<b>2</b>	This would only be appropriate for major development, e.g. large scale commercial uses and residential developments.		
<b>3</b>	This is not appropriate.		

## Air Quality

Air pollution and reduced air quality can be detrimental to human health and other biological resources such as plant species.

The Air Quality Strategy 2007 sets out national air quality standards for two major air pollutants: particles and nitrogen dioxide, which if levels of these found to be exceeding the Strategy's recommended levels within a Council area, an Air Quality Management Area must be declared.

Within Leeds there are eight designated Air Quality Management Areas, with seven identified for Nitrogen Dioxide and one for Fine Particles. As a result, the Council's aims to improve these by reducing emissions from traffic; and industrial and domestic sources.

### Key Issues

- How should Leeds improve its air quality without restricting development and ensuring that effective transportation is maintained?

36. Do you agree that the main cause of air pollution and reduction in quality is as a result of transport emissions?

Yes	
No	

If 'No', what do you believe is the main cause of air pollution?

If 'Yes', do you agree with any of these options?

Options for Air Quality		Yes	No
<b>1</b>	The NRWDPD should contain a policy on the improvement of air quality, but this issue should also be specifically addressed within the Transport DPD, or		
<b>2</b>	Issues of air quality improvement should be solely addressed in the Transport DPD		
<b>3</b>	Issues of air quality improvement should be addressed in the DPDs on Transport, Housing and employment and Retail (given that air pollution is also caused by carbon emissions from development).		

37. A secondary but important issue with regards to air quality is air pollution emitted from industrial premises and how this may affect local residents (See the Glossary of Terms and List of Abbreviations for definitions). Should the Council:

Options for Air Quality		Yes	No
<b>1</b>	Make a presumption against new industrial processes that produce emissions to air from residential areas and encourage the retrofitting of BAT to the highest possible standard into existing industrial premises? Or		
<b>2</b>	Make a presumption against new industrial processes that produce emissions to air from residential areas and negotiate with the Environment Agency (A1) and / or Local environmental health bodies (A2)? Or		

<b>3</b>	Demand the strictest emission technologies on the market in line with the strictest interpretation of BAT particularly (even if it goes beyond Environment Agency PPC guidelines) and negotiate with the Environment Agency (A1) and or Local environmental health bodies (A2)? Or		
<b>4</b>	Demand the strictest emission technologies on the market in line with the strictest interpretation of BAT particularly (even if it goes beyond Environment Agency PPC guidelines) and negotiate with the Environment Agency (A1) and or Local environmental health bodies (A2) to encourage the retrofitting of BAT to the highest possible standard.		

38. If this NRWDPD contains a policy on improving air quality, would it be appropriate to have a policy that requires development to address and mitigate against air quality impacts (for example through biodiversity creation, or limits on transport use within developments) in the following locations:

<b>Options for Air Quality</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Only identified AQMAs (both current and future)		
<b>2</b>	Identified AQMAs and an appropriate buffer zone around its perimeter		
<b>3</b>	Throughout the whole of the City Council area?		

If you think Option 2 is appropriate, what width of buffer zone would you suggest?

39. This NRWDPD National and regional guidance seeks to ensure sustainability through promoting sites which could be accessed by alternative modes of transport. This is more likely to be feasible where major waste and minerals facilities are located together. It may also be possible to utilise alternative fuels for lorry transportation. Within the Leeds District there are also three railheads which have the capacity to move minerals, processed aggregates or waste. Of these only one is currently active. There is also an existing inland waterway network with links to Commercial Navigations.

<b>Access to Waste and Minerals Sites</b>		<b>Yes</b>	<b>No</b>
<b>1</b>	Continue to rely on road transport as the main mode of minerals and waste transfer as this retains flexibility.		
<b>2</b>	Are additional facilities such as rail borne depots or wharfs which support water transport required, thereby reducing the need for road transport, and if so, should broad locations which would support the shared facilities for minerals and waste and other materials be identified?		

**THANK YOU FOR YOUR COMMENTS.**

**Please tick this box if you would like to be informed about the next stage of consultation**