



Leeds
CITY COUNCIL

Aire Valley Leeds Area Action Plan **Sustainability Appraisal, Non-Technical** **Summary**

Publication Draft
Leeds Local Development Framework
Development Plan Document
September 2015



1.0 Introduction

- 1.1 Leeds City Council is preparing the Aire Valley Leeds Area Action Plan (AVLAAP). This provides a spatial planning framework, plan wide policies, area plans and site specific allocations that deliver relevant Core Strategy priorities and requirements. A key element of this will be to ensure that sufficient land is available in appropriate locations to meet the housing and employment land targets for the area set out in the Core Strategy.
- 1.2 The first stage of plan preparation started in 2005 and the plan has subsequently evolved through three stages of public consultation: Early Issues and Options 2005; Alternative Options in 2006 and Preferred Options in 2007. Since 2007 there has been a major review of the proposals into account a number of factors including the downturn of the economy post 2008 (which has impacted on the viability of development), potential ways of funding infrastructure and the designation of the Leeds City Region Enterprise Zone (within AVL) in April 2012. Additional informal consultation took place in 2011 to ask views on a number of key changes relating to the promotion of the area as an Urban Eco-Settlement (UES), changes to the AAP boundary to include parts of Leeds City Centre, Hunslet and Richmond Hill and amendments to the proposed uses on some sites. The current stage, the Publication Draft Plan, is the council's final version of the plan and has to be 'placed on deposit' for a statutory period of consultation. The plan is considered by the council to have complied with the legal and procedural requirements and 'to be sound'.
- 1.3 This non-technical summary of the Sustainability Appraisal (SA) report should be viewed alongside the SA report and (AVLAAP) Publication Draft.

What is Sustainability Appraisal?

- 1.4 The Sustainability Appraisal (SA) is a means to identify and evaluate the impact of a development plan proposals on economic, social and environmental objectives. It provides an approach of assessing and providing recommendations to improve plans as they are developed and identifying ways to make proposals more sustainable by tackling issues highlighted by the appraisal. This process of identifying actions to improve a site's sustainability or lessen the harmful impacts is often referred to as mitigation.
- 1.5 It should be noted, the SA cannot ensure that development will be sustainable in all aspects. It can only show how sustainable the effects of a policy or site are likely to be and where there are harmful impacts, how far they can be mitigated. A policy or site may have negative environmental impacts but these could be outweighed by positive social and economic aspects.
- 1.6 The council is not required to pursue the recommendations from this process. For example, there may be specific local circumstances that justify choosing a particular option that does not perform as well as others when appraised against the SA framework. If such instances arise, particular attention should be given to implementing recommended mitigation measures.

Legislative Requirement for Sustainability Appraisal

- 1.7 European legislation requires local authorities to prepare a Strategic Environmental Assessment (SEA) of the effects of certain plans and programmes on the environment, which includes development plans. The SEA Directive was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.8 The Planning and Compulsory Purchase Act 2004 introduced a requirement for local authorities to carry out an appraisal of the sustainability of Local Development Framework (LDF) documents - a Sustainability Appraisal. The National Planning Policy Framework (NPPF) states that an assessment of environmental effects be considered alongside social and economic effects.

2.0 Methodology

- 2.1 The first stage of the Sustainability Appraisal was the review of plans, policies and programmes relevant to the scope of the AVLAAP (provided at Appendix 2 of the full SA report). Information referred to as baseline evidence was also collated to develop an understanding of the existing social, environmental and economic characteristics of the Leeds District and AVL (Appendix 3 of the SA report). As part of this process, the Sustainability Appraisal Framework was reviewed to ensure that it could be used to assess the Aire Valley Leeds Area Action Plan. The SA Framework is explained in more detail in paragraph 2.7 below. A Scoping Report was then prepared in 2005 and subject to consultation with the SA Consultees (English Heritage, Environment Agency and Natural England) and revised to reflect the comments received (see paragraph 2.1.2 of the SA report).
- 2.2 In addition to the formal consultation undertaken at the scoping and 'Early Issues and Option's stage, officers have been working with a number of consultees to establish an evidence base of comments and information on the individual sites subject to detailed assessment through the Aire Valley Leeds Area Action Plan process. The evidence collected has informed the assessment of individual sites against the SA Framework objectives.
- 2.3 Comments have been received from the council's highways and transportation, ecology, flood risk management, environmental health and education. External consultees include Highways England (formerly Highways Agency), West Yorkshire Combined Authority, Network Rail, West Yorkshire Ecology, Yorkshire Water and the Environment Agency.

Difficulties Encountered in Compiling the Information or Carrying out the Assessment

- 2.4 The complexity of the AVLAAP and reflecting changes over time, has been one of the greatest challenges in carrying out the Sustainability Assessment. Reviewing the wider policy and economic context (and their implications for AVL) have been key issues in advancing the plan. Managing the process of collating technical comments from other council services and external

consultees and data supporting the assessment work has been time consuming.

- 2.5 The baseline has been updated since the ‘Early Issues & Options’ consultation document and managing this process has also been reliant upon the combined resources of officers which has been challenging given other work priorities (including the preparation of the Core Strategy and the Site Allocation Plan). These updates were considered necessary to make the baseline information more ‘fit for purpose’ for the SA of the AVLAAP.

Key Sustainability Issues

- 2.6 By looking at existing evidence for the Leeds district and the AVL area, the table below identifies the key social, environmental and economic issues that could be affected by or potentially addressed by the AVLAAP:

Social	1. Provide housing provision for all
	2. Improve health and well-being and reduce health inequalities
	3. Improve access and provision of services including access to sustainable means of transport
Environmental	4. Prioritise development on brownfield sites in accessible locations in preference to greenfield sites
	5. Improve access to, increase the quantity and improve the quality of local green space
	6. Address the increased likelihood of flooding
	7. Reduce greenhouse emissions to address climate change
	8. Reduce the number of car journeys into and around the city, particularly into the city centre
	9. Protection of biodiversity and the natural environment
	10. Preserve and enhance the historic environment
Economic	11. Encourage sustainable economic growth, providing new opportunities for economic development
	12. Improve the vitality and viability of the city centre, town and local centres.

Sustainability Objectives

- 2.7 The Sustainability Appraisal Framework provides a way in which sustainability effects can be described, analysed and compared. It comprises 22 objectives, decision-making criteria and indicators which can be used to assist in the assessment of significant effects. The SA objectives are listed below:

Economic Objectives	
SA1	Maintain or improve good quality employment opportunities and reduce the disparities in the Leeds’ labour market.
SA2	Maintain or improve the conditions which have enabled business success, economic growth and investment.

Social Objectives	
SA3	Increase participation in education and life-long learning and reduce the disparity in participation and qualifications achieved across Leeds.
SA4	Improve conditions and services that engender good health and reduce disparities in health across Leeds.
SA5	Reduce overall rates of crime, and reduce the disparities in crime rates across Leeds.
SA6	Maintain and improve culture, leisure and recreational activities that are available to all.
SA7	Improve the overall quality of housing and reduce the disparity in housing markets across Leeds.
SA8	Increase social inclusion and active community participation.
SA9	Increase community cohesion.
Environmental Objectives	
SA10	Increase the quantity, quality and accessibility of green space.
SA11	Minimise the pressure on greenfield land by efficient land use patterns that make good use of derelict and previously used sites and promote balanced development, provided that it is not of high environmental value (defined as ecological value)
SA12	Maintain and enhance, restore or add to biodiversity or geological conservation interests.
SA13	Reduce greenhouse gas emissions and thereby help to tackle climate change.
SA14	Improve Leeds' ability to manage extreme weather conditions including flood risk and climate change.
SA15	Provide a transport network which maximises access, whilst minimising detrimental impacts.
SA16	Increase the proportion of local needs that are met locally.
SA17	Reduce the growth in waste generated and landfilled.
SA18	Reduce pollution levels.
SA19	Maintain and enhance landscape quality.
SA20	Maintain and enhance the quality and distinctiveness of the built environment.
SA21	Preserve and enhance the historic environment.
SA22	Make efficient use of energy and natural resources and promote sustainable design.

Main options considered and how they were identified

- 2.8 The AVLAAP alternative options were published and consulted upon in April 2006. The SA of alternative options was undertaken to inform preparation of preferred options covering a range of issues (employment, housing, town centre uses, transport, waste management, recreation and design and environment) and detailed proposals for 11 character areas, including proposed site allocations. The AVLAAP preferred options were published and

consulted upon in October 2007. The SA report¹ published at the same time, set out in detail, how the alternative options were identified and preferred options selected, and shows the results of the assessment of the sustainability effects of both alternative and preferred options.

- 2.9 A further review of the AVLAAP was then undertaken in the period after the preferred options were published. This was necessary to take proper account of a number of emerging and changing considerations, as well as responses received to the consultation on preferred options.
- 2.10 As a result, the council undertook further consultation on two additional alternative options in February 2011. These were:
- A proposed extension to the boundary of the AAP to include parts of Leeds City Centre, Hunslet, Richmond Hill and the area around Skelton Lake;
 - The promotion of the area as an Urban Eco-Settlement (UES).
- 2.11 These additional options were subject to sustainability appraisal. The results of the appraisal are detailed in Appendix 5 of the main SA report. Both options improve the sustainability of the plan. The extension of the boundary would be particularly beneficial in terms of providing the ability to improve links between employment areas in AVL and the communities living closest to these areas and general links to, along and across the river corridor, including better links into the city centre.
- 2.12 Additional consultation took place in 2011 on potential site allocations within the extended area and some amendments to allocations within the original plan boundary. This included the removal of a major housing allocation in the Stourton and Skelton Grange area to the north and south of the river corridor for viability reasons.
- 2.13 The role of the AVLAAP is to deliver relevant Core Strategy priorities and requirements. A key element of this plan is to ensure that sufficient land is available in appropriate locations to meet the housing and employment land targets. This includes specific targets to identify land for a minimum of 6,500 new homes and 250 hectares of employment land. The Core Strategy has been subject to its own Sustainability Appraisal (SA). It should be noted that these specific targets were first published in the publication draft version of the Core Strategy in April 2012 and did not directly inform options and allocations presented in either the 2007 or 2011 consultation.
- 2.14 The table in Appendix 6 of the SA report details the changes to proposed site allocations between the Preferred Options in 2007, the informal consultation in 2011 and the publication draft version of the plan in 2015.

¹ Aire Valley Leeds Area Action Plan, Sustainability Appraisal Report, October 2007

Approach taken to identifying the Sustainability effects of the Aire Valley Leeds AAP

- 2.15 In order to identify the sustainability effects of the plan, the urban eco-settlement supporting principles (Section 2 of the AAP), proposed policies (Section 3) and proposed allocations and alternative sites put forward for consideration have each been assessed against the 22 SA objectives.
- 2.16 In terms of assessment of proposed allocations and alternative sites, a scoring framework was established to achieve a consistent approach. This set out a recommended score for sites reflecting site performance against each of the 22 SA objectives. The scores range from a major positive effect (++) , minor positive (+), neutral (0), minor negative (-) to major negative (--). Sites with an uncertain effect are scored (u). The scoring criteria are detailed in Table 4 (Section 5) of the SA report.

Summary of identified effects

SA of objectives (supporting principles)

- 2.17 The assessment of the objectives of the AAP against the 22 SA objectives is provided in Appendix 9 of the SA report. This shows the objectives have positive sustainability effects, particularly later in the plan period, although there is some uncertainty over the likelihood of achieving these where proposals are more aspirational.

SA of proposed policies

- 2.18 The assessment of proposed policies in the AAP against the 22 SA objectives is provided in Appendix 9 of the SA report. Overall each policy is broadly positive in terms of sustainability effects, particularly later in the plan period, but a number of negative effects have been identified. Potential mitigation measures have been suggested in the comments to the policy.

SA of proposed allocations and alternative sites (not proposed)

- 2.19 The assessment of the proposed and alternative sites against the 22 SA objectives is provided in Appendix 7 and 8 of the SA report. Where appropriate mitigation measures (such as recommended site-specific requirements to provide new supporting infrastructure) have been identified in the comments provided under each site.

Cumulative impact

- 2.20 The SEA Directive requires that an assessment is made of the likely significant effects of the plan, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects and secondary and cumulative effects. Collectively this is called an assessment of the cumulative impact.
- 2.21 This process considers the effects of the AVLAAP as a whole against the SA objectives. Appendix 1 of this document provides the summary of the cumulative effects and highlights some examples of individual allocations where key issues were identified. The assessment does not consider the sustainability effects associated with the quantum of development as this was assessed by the SA of the Core Strategy. The assessment is focussed on the location of site allocations, their distribution and the associated infrastructure proposals.

3.0 Proposed Mitigation Measures and How the SA has Influenced the Identification of Mitigation Measures

- 3.1 In accordance with the SEA Directive, the SA must include consideration of measures to prevent, reduce or offset adverse or harmful effects of implementing the proposals in the AVLAAP. These measures are usually referred to as 'mitigation measures'.
- 3.2 Mitigation measures can be a combination of policies to prevent or reduce the severity of effects, such as requirements identified in the National Planning Policy Framework, the Core Strategy, UDP or other supporting policy documents. They can also be site specific requirements applied by the AVLAAP or through subsequent planning applications for individual sites.
- 3.3 Appendix 11 of the SA report outlines the range of mitigation measures associated with each of the 22 SA objectives which could be used to off-set negative or harmful impacts for individual site allocations.

4.0 Proposals for Monitoring

- 4.1 The SEA Directive requires the monitoring of significant environmental effects resulting from the implementation of the AVLAAP. The Core Strategy has established a monitoring framework which will also be used to assess the effects of the AVLAAP. The monitoring framework is provided in Appendix 12 of the SA report.

5.0 Habitats Regulations Assessment

- 5.1 In compliance with the Habitats Directive (92/43/EEC), plans must be screened and assessed for their impacts on European wildlife sites (under the Conservation of Habitats and Species Regulations 2010 SI no.2010/490). The process of screening and appropriate assessment is often referred to as a 'Habitats Regulations Assessment' (HRA). Plans can only be permitted

having ascertained that there will be no adverse effects on the integrity of European sites or European offshore marine sites (unless there are 'imperative reasons of overriding public interest').

- 5.2 A Habitats Regulation Assessment (HRA) Screening of the Core Strategy has previously been undertaken and a number of amendments to policy wording.
- 5.3 Following the preparation of the initial draft combined HRA Screening Assessment for the Site Allocations Plan and Aire Valley Leeds Area Action Plan, a response from Natural England (NE) has been received. In response to these comments, further clarification and technical work has been completed, and a further response from NE is awaited. The majority of comments relate to the updating and the presentation of technical information.

Appendix 1: Summary of Significant Effects of the Aire Valley Leeds Area Action Plan

Summary of Effects

Type of Effect		Geographical Scale	
++	Significant positive effect	L	Local
+	Positive effect	R	Regional
O	Neutral effect	N	National
?	Uncertain effect	G	Global
-	Negative effect		
--	Significant negative effect		
Likelihood		Timescale	
H	High	S	Short term – 0 to 5 years
M	Medium	M	Medium term – 5 to 10 years
L	Low	L	Long term – 10+ years
Permanence			
P	Permanent – plan period		
T	Temporary – less than 5 years		

SA Objective	Geographical Scale	Permanence	Timescale	Likelihood	Assessment	Justification
SA1 – Employment Opportunities	R & L	P	S-L	H	++	<ul style="list-style-type: none"> • Employment allocations and mixed use allocations providing employment (including retail uses). New and retained allocations • Leeds City Region Enterprise Zone is located within the boundary of the plan • All employment allocations are located in the main urban area and the AVL regeneration area consistent with Core Strategy Policy SP1 • The employment target of 250 hectares set in the Core Strategy SP5 is identified • Identified sites suitable for office development within Leeds City Centre, consistent with CS Policy SP3 • There will be some loss of existing employment

						<p>sites to housing use, creating a negative effect. Overall the plan will have a significant positive effect in terms of increasing good quality employment opportunities close to areas of lower than average employment and higher than average deprivation indices.</p>
SA2 – Economic Conditions	R & L	P	S-L	H	++	<ul style="list-style-type: none"> • Employment allocations and mixed use allocations providing employment (including retail uses). New and retained allocations • Supporting investment in the city centre and boundary changes to Hunslet town centre, promoting opportunities for new commercial development • Reflecting Core Strategy objectives for the role of the city centre and town centres (Policy SP1 & SP3) • Providing good quality sites as employment allocations in regeneration areas subject to economic programmes, thereby encouraging investment in those areas.
SA3 – Education	L	P	S-L	H	+	<ul style="list-style-type: none"> • Allocation of land to accommodate new schools to address increased demands for school places arising from new housing – phased to address housing needs • Beyond the scope of the plan to increase participation in education and qualifications in disadvantaged communities and BME groups. However, by allocating new development in the regeneration areas there are opportunities for increased participation through local employment linked training through construction jobs or directly with end users. Supported by Core Strategy Spatial Policy 8 and AVL5.
SA4 - Health	L	P	S-L	M	+	<ul style="list-style-type: none"> • Protection of existing green space and designation of new green space and other green infrastructure, thus enabling existing and new communities improved access to green space. Encouraging increased recreation participation and healthy

						<p>lifestyles.</p> <ul style="list-style-type: none"> • Promoting accessible locations for new development which are linked to facilities, services and job opportunities by sustainable healthy transport corridors such as cycling and pedestrians. • Promotion of heat networks is specifically to address issues of fuel poverty and health impacts. • Provision of employment opportunities and take-up through local employment addresses issues of poverty, deprivation and ultimately health.
SA5 – Crime	L	P	S-L	M	0	<ul style="list-style-type: none"> • Difficult to assess due to lack of direct link between planning and crime. • Promotion of reusing derelict/vacant sites decreasing likelihood of these sites becoming subject to criminal activity • Promotion of pedestrian and cycle links can increase use, thereby increasing activity and levels of natural surveillance and creating a safer route
SA6 – Culture, leisure & recreation	R & L	P	S-L	M	++	<ul style="list-style-type: none"> • New housing in and on the edge of Leeds City Centre and locations with access to existing facilities and attractions across the city will support participation • New employment allocations directed to Leeds City Centre and Hunslet Town Centre will support and may increase patronage of existing facilities and services • Retail policies protecting the city centre and town centre boundaries will reinforce the role and attraction of centres. • Promote recreational activities and new facilities with sustainable access from surrounding communities.
SA7 – Housing	L	P	S-L	H	++	<ul style="list-style-type: none"> • The number and distribution of new housing provided through the proposed housing allocations reflects minimum target of 6,500 set out in Core Strategy Policy SP5. • The delivery of the housing allocations will be expected to provide affordable housing reflecting

						<p>Policy H5 of the Core Strategy</p> <ul style="list-style-type: none"> • The delivery of a mix of housing types will be expected to address the requirements of Core Strategy Policy H4 • Sites are identified as particularly suitable for elderly people using criteria from CS Policy H8. • The delivery of the new housing allocations will be assessed against national housing standards for energy efficiency. • Promoting local carbon energy distribution and retrofitting in policies AVL16 and AVL17.
SA8 – Social inclusion & participation	L	P	S-L	M	+	<ul style="list-style-type: none"> • Provides large employment and mixed use opportunities in an identified regeneration area with higher levels of deprivation. • Sites located in accessible areas will enable access to existing services. Improved accessibility is promoted and required in less accessible locations as part of appropriate mitigation. New sustainable links also have health benefits in promoting walking and cycling to work and other services and facilities. • Protecting green space areas will provide opportunities for recreation participation. • Sites identified for new schools & health facilities. • Promoting local carbon energy distribution and retrofitting in policies AVL16 and AVL17 to tackle fuel poverty.
SA9 – Community cohesion	L	P	M-L	M	+	<ul style="list-style-type: none"> • Appropriate mitigation will be needed through design / landscape treatment, infrastructure, phasing • New housing and employment allocations provide for identified needs established and agreed through the adopted Core Strategy, for example through providing new homes for people currently unable to find local housing. New communities will also be established as part of the large scale housing allocation at Copperfields and Skelton Gate where new facilities and infrastructure will be required.

						<ul style="list-style-type: none"> • New housing development can be used to increase potential spending and encourage new retail development in areas of need with low car ownership.
SA10 – Greenspace	L	P	S-L	H	+	<ul style="list-style-type: none"> • The plan proposes loss of green space at three sites; Copperfield, Stourton and Bow Street/ Ellerby Rd. Copperfield will include for new green space within the sites redevelopment which will also include for wider public access beyond the existing situation. Redevelopment of Bow Street will need to link to improvement of the protected and retained green space adjacent. • The AVLAAP proposes the continued protection of existing UDP green space designations where they are still in a green space use and the protection of new or previously undesignated green space identified through the audit of sites across the Leeds district. This protects the quantity of green space and access of communities to it (standards are set in Core Strategy Policy G3). • Deficiencies of green space are identified in the Green Space Background Paper. Through new housing allocations, provision for new on-site green space will be sought under Core Strategy Policies G4 and G5 which will increase green space provision, but will not necessarily address identified deficiencies. The plan includes the provision of new and improved links between development sites and existing green space at the boundary of the plan area. • Includes for provision of a new city centre park in an identified area of accessible deficiency.
SA11 – Greenfield and brownfield land	L	P	S-L	H	0	<ul style="list-style-type: none"> • The AVLAAP seeks to maximise the delivery of brownfield land. The majority of identified housing sites in the plan are on brownfield sites. • Existing employment sites (including office) with planning permission comprise the majority of the employment land supply. Most of these are on

						<p>greenfield sites. The majority of allocations are on brownfield sites.</p> <ul style="list-style-type: none"> Mixed use allocations in the city centre and on the boundary of the city centre are on brownfield land. As these sites are located in accessible locations, redevelopment is promoted at higher densities to minimise the need to identify further greenfield sites.
SA12 – Biodiversity and geological conservation	L	P	S-L	M	0	<ul style="list-style-type: none"> The majority of sites will have no significant ecological impact A number of the proposed allocations will potentially affect sites with nature conservation value, including sites designated as Leeds Nature Areas (LNAs) or habitats identified in the Leeds Biodiversity Action Plan or UK Biodiversity Action Plan Priority Habitats or within the Leeds Habitat Network. It is important that appropriate measures are used to protect areas with biodiversity value through site specific requirements or Core Strategy policies. The plan identifies the Green Infrastructure network, including the required improvements. Land at the former sludge lagoon, a previous UDP employment allocation is not being carried forward and is now identified as part of the habitat network.
SA13 – Greenhouse emissions	L	P	S-L	H	+	<ul style="list-style-type: none"> The strategy for the location of new development was established through the Policy SP10 which directs development to more sustainable locations within the settlement hierarchy, thereby directing growth to areas with access to public transport and existing services. The majority of allocations are in accessible locations with existing public transport or planned improvements, such as Temple Green Park & Ride. Skelton Gate site on the edge of the urban area and in the Green Belt is less accessible and appropriate mitigation will be required. Skelton Gate has poor accessibility, with no existing public

						transport provision. Given its scale and location, there is an opportunity to provide new infrastructure to address the existing accessibility limitations. This would also benefit the public transport corridors by increasing frequency of services or routing services through existing urban areas with no service due to existing lack of operator interest.
SA14 – Flood risk	R & L	P	S-L	H	–	<ul style="list-style-type: none"> • A number of allocated sites in zone 3a and zone 2 • The flood risk sequential test shows that the area housing target cannot be met without allocating sites in flood zones 2 and 3a. The NPPF requires that to allocate vulnerable uses (i.e. housing) in Zone 3a flood risk, an exception test must be satisfied. This needs to demonstrate that the site is more sustainable than alternative sites and that suitable and appropriate mitigation measures can be incorporated within the site's development. The sites identified in the AVLAAP satisfy the exception test criteria. • Allocated sites in identified flood risk Zones 2 and 3a will require a flood risk assessment to demonstrate how the sites development deals with flood risk issues and that the proposed flood risk mitigation is appropriate. • SuDS are now required for all development since April 2015, which helps to manage flood risk. • NRWLP flood risk policies provide a way to manage flood risk on all sites.
SA15 – Transport network	R & L	P	S-L	H	+	<ul style="list-style-type: none"> • The strategy for the location of new development was established through Core Strategy Policy SP1 which directs development to more sustainable locations, thereby directing growth to areas with access to public transport and existing services. Consequently, the majority of allocated sites are in sustainable and accessible locations with access to services, facilities and employment opportunities. • Skelton Gate, Leeds Valley Park & Skelton Grange on the edge of the urban area and in the Green Belt

						is less accessible and appropriate public transport mitigation will be required. These sites have poor accessibility, with no existing public transport provision. Given the scale and location of Skelton Gate, there is an opportunity to provide new infrastructure to address the existing accessibility limitations. This would also benefit the public transport corridors by increasing frequency of services or routing services through existing urban areas with no service due to existing lack of operator interest.
SA16 – Local needs	L	P	S-L	H	+	<ul style="list-style-type: none"> • The strategy for the location of new development was established through the Core Strategy Policy SP1 which directs development to more sustainable locations within the settlement hierarchy. Many of the proposed allocations provide access to the existing services. For less accessible locations mitigation will be required either on-site or improved links to existing services and facilities. The specific mitigation will be appropriate the scale of the proposed development. • The growth supported by the employment, housing and mixed use allocations will attract new investment and by achieving access to the city centre and town centres will support existing businesses. • Existing Core Strategy policies provide a policy framework for addressing local needs through the housing mix (Policy H4) and affordable housing (Policy H5). The plan identifies sites for elderly accommodation (supported by Core Strategy Policy H8).
SA17 – Waste	L	P	S-L	H	0	<ul style="list-style-type: none"> • The Natural Resources & Waste DPD identifies sites for waste management. These allocations are reflected in the AVLAAP as appropriate. • A number of the proposed allocations lie within 100m of designated waste sites. To mitigate any potentially harmful effects, the plan sets out the

						<p>required mitigation requirements.</p> <ul style="list-style-type: none"> The existence of allocated waste sites is reflected in the allocation of specific uses to avoid conflict between inappropriate neighbouring land uses.
SA18 – Pollution	L	P?	S-L	M	0	<ul style="list-style-type: none"> The proposed allocations include a number of contaminated sites. This provides opportunities to improve the site conditions through appropriate remediation measures. Housing and mixed use allocations are proposed in and adjacent to air quality management areas and areas of concern in regard to air quality. Mitigation measures set out in the plan include tree planting, greening of routes and open space provision. This includes provision of the city park. Effects on air quality/emissions particularly for sites in the less accessible locations will lead to increased car useage and therefore increased pollution. Appropriate mitigation is required through measures to improve accessibility The effects on water quality will need to be mitigated, for example through Sustainable Urban Drainage Systems. See Leeds Sustainable Urban Drainage SPG, NRWLP Policy Water 7 drainage standards and the Minimal Development Control Standards for Flood Risk.
SA19 – Landscape	L	P	S-L	H	0	<ul style="list-style-type: none"> A number of the sites proposed for allocation contain Tree Preservation Orders or areas worthy of designation as TPOs. UDP & Core Strategy policies and the Neighbourhoods for Living SPG should be applied to assess the landscape value of the sites. The plan allocates sites comprising derelict and vacant land. The development of these sites would have an overall positive impact on the landscape. By incorporating tree planting and hedgerows. New and improved cycleways will incorporate a range of potential improvements, including tree planting, hedgerows, stone wall repairs etc.

SA20 - Local distinctiveness	L	P	S-L	M	+	<ul style="list-style-type: none"> • The plan allocates sites comprising derelict and vacant land. The development of these sites would have an overall positive impact on local distinctiveness. • Those sites on green field land and in the Green Belt need to sensitively respect their setting with appropriate design and landscape requirements set out in the policies. The plan also sets out how these sites should integrate within the wider GI network.
SA21 – Historic environment	L	P	S-L	M	0	<ul style="list-style-type: none"> • A number of sites include or lie within or in close proximity to a heritage asset (Listed Buildings, Conservation Areas, Registered Park and Garden). Sensitive locations include Temple Newsam and Hunslet Cemetery. • The plan encourages the reuse of heritage buildings at risk such as Hunslet Mill and adopts a flexible approach to acceptable uses in order for this objective to be achieved. • The plan identifies and protects locally significant heritage assets.
SA22 – Energy & natural resources	L	P	S-L	H	0	<ul style="list-style-type: none"> • Proposing new allocations places pressure on resource consumption (water and energy). • The plan promotes the creation of a heat network and retrofitting of buildings and improved energy efficiency, leading to a more efficient use of natural resources and creation of energy from renewable sources. • A number of the proposed allocations are within Mineral Safeguarding Areas for either coal or sand and gravel. These will need to have regard to policies Minerals 2 and 3 in the NRWLP which seek to prevent the resource from being sterilized by development.

For more information, please contact:

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Sustainability Appraisal, Non-Technical Summary

Publication Draft

Leeds Local Development Framework
Development Plan Document

September 2015