



Leeds
CITY COUNCIL

Site Allocations Plan Revised Publication Draft: Area Proposals for Outer North East

Flood Risk Sequential Test & Exception Test of Proposed Site Allocations in the Outer North East Addendum

**Leeds Local Development Framework
Development Plan Document
September 2016**



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1. INTRODUCTION

- 1.1. This paper sets out the sequential and exception tests relating to the proposed allocations in the Site Allocations Plan (SAP) for the Outer North East Housing Market Characteristic Area (HMCA). It follows the steps outlined in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) using a methodology devised by the council following earlier consultation with the Environment Agency.
- 1.2. This assessment considers potential development sites in the Outer North East of Leeds. Whilst the majority of sites are located outside an area of high flood risk some lie wholly or partly within higher flood zones 2 or 3 as defined by the Leeds Strategic Flood Risk Assessment (SFRA) (2007) and updated by the latest Environment Agency flood risk maps (May 2015).
- 1.3. Leeds has been split into 11 different housing market characteristic areas (HMCAs) for the purposes of the Site Allocations Plan. Information regarding the flood risk sequential and exception tests for those areas can be found in the Flood Risk Background Paper published alongside the Publication Draft Site Allocations Plan in September 2015. This document represents an update to that work following changes to the allocations in the Outer North East HMCA.
- 1.4. The Leeds Strategic Flood Risk Assessment (SFRA) underpins this document, supplemented where appropriate by flood risk updates provided by the Environment Agency and by Sustainability Appraisal.

2. POLICY CONTEXT

2.1. National Policies NPPF

- 2.1.1. The Government's policies and guidance on flood risk are set out in the National Planning Policy Framework (Section 10) and in the NPPG which provides further guidance on flood risk.
- 2.1.2. The NPPF (Para 100) states:
"inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere... Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:
 - *applying the Sequential Test;*
 - *if necessary, applying the Exception Test;*
 - *safeguarding land from development that is required for current and future flood management;*
 - *using opportunities offered by new development to reduce the causes and impacts of flooding;*
 - *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations."*

probability of flooding. The SFRA will provide the basis for providing the test. A sequential approach should be used in areas known to be at risk from any form of flooding.

2.1.4. *Paragraph 102: If, following the application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:*

- *it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk;*
- *a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*

2.1.5. *Both elements of the test will have to be passed for development to be allocated or permitted.*

2.2. Local Policies

Leeds Core Strategy

2.2.1. The Leeds Core Strategy approach is guided by the need for a sustainable settlement strategy and the desire to consider a range of economic, social and environmental issues. Consequently, it directs that future growth should be located where it would be most effective in supporting sustainable communities, urban renaissance, regeneration, housing renewal and economic development to support job creation. Central to this approach is the principle to reuse previously developed land within urban areas. Priority is given to urban potential (including infill and particularly brownfield sites), even though within these broad strategic locations there are areas of flood risk. Objective 18 of the Leeds Core strategy states:

“Secure development which has regard to its impact on the local environment and is resilient to the consequences of climate change, including flood risk.”

2.2.2. This approach is reinforced in the following relevant policies; SP3 Role of the City Centre, criterion vi, SP6 The Housing Requirement and the Allocation of Housing Land, criterion vii and EN5 Managing Flood Risk.

2.3. Natural Resources and Waste Local Plan 2013

2.3.1 The Natural Resources and Waste Local Plan contains a set of detailed policies that help to manage flood risk from both rivers and from surface water flooding. The policies include protection of areas of functional floodplain from development and a requirement for development to reduce the rate of surface water run off. There is also a policy which provides guidance for development in zones of rapid inundation.

2.4 Leeds Strategic Flood Risk Assessment (SFRA)

2.4.1 Completed in 2007, the Leeds SFRA provides a comprehensive overview of the river and drainage systems across the district and associated flood risks. The SFRA provides the context for the application of the sequential test. The document subdivides the district into zones of ‘high’, ‘medium’ and ‘low’ probability of flooding.

The document highlights the River Aire, River Wharfe and their tributaries as dominant features of the District. A large proportion of local communities are situated adjacent to, or near, these rivers and/or their tributaries. The south-eastern boundary of the District is adjacent to the River Calder and Leeds also experiences flooding from this River. The Environment Agency estimates that there are 1500 homes and 500 businesses at 'significant' risk of river flooding within the District, and indeed parts of Leeds City Centre. As a consequence of being located adjacent to the River Aire, parts of the City Centre and regeneration areas are within zone 3a high probability area. The Leeds SFRA provides a basis to ensure that detailed flood risk issues are understood where it aligns with more recent Environment Agency (EA) flood data. Where there is a difference with EA data, the EA data takes precedence because it is more recent, although best judgements will have to be made on how the EA flood zone 3 may divide between 3ai and 3aii.

2.4.3 In the SFRA **Flood zone 2** is defined as areas with a medium probability of flooding and comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year. In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development, and the appropriate application of sustainable drainage systems.

2.4.4 **Flood zone 3a** is defined as areas with a high probability of flooding and comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year. In this zone, developers and local authorities should seek opportunities to:

- reduce the overall level of flood risk in the area through the layout and form of the development and the appropriate application of sustainable drainage systems;
- relocate existing development to land in zones with a lower probability of flooding; and
- create space for flooding to occur by restoring functional floodplain and flood flow pathways and by identifying, allocating and safeguarding open space for flood storage.

2.4.5 **Sub Delineation of Zone 3a**

A number of areas of existing development within the District of Leeds are affected by flooding with a 5% (1 in 20 year) probability. Careful consideration must be given to the future sustainability of development within areas that may be subject to flooding on a relatively frequent basis. For this reason, Zone 3a High Probability has been sub delineated in the following manner:

- Zone 3a(ii) High Probability - areas that fall within the 5% (1 in 20 year) flood envelope; and
- Zone 3a(i) High Probability - areas that fall outside of the 5% (1 in 20 year) flood envelope, however are affected by flooding in the 1% (1 in 100 year) event.

2.4.6 **Flood zone 3b**

This is the functional floodplain and has been defined in the Council's Strategic Flood Risk Assessment in the following way:

Zone 3b Functional Floodplain is land:

- where water flows or has to be stored in times of flood;
- that is subject to flooding with a 1 in 20 year (5%) probability (or more frequently); and
- that is reserved by Leeds City Council for this purpose.

Where the Council has identified that undeveloped land already has an existing planning permission or a brownfield allocation that has been protected through the 'Saved Policies'

review of the Leeds Unitary Development Plan, then a decision has been made not to include it in the functional floodplain.

The functional floodplain therefore primarily consists of the broad open spaces adjoining the waterway corridors of the River Wharfe and River Aire. It is essential that these floodplain areas are protected from future development.

3 SITE AND FLOOD RISK INFORMATION

3.1 Site Locations

3.1.1 The development sites assessed have been identified from the following sources:

- existing land use allocations identified in the Leeds Unitary Development Plan (UDP Review 2006) which remain available;
- sites with planning permission;
- sites submitted for consideration as part of the Strategic Housing Land Availability Assessment;
- sites from a 'Call for Sites' exercise in January 2013;
- sites submitted by developers / land owners or the general public;
- Council owned land.
- Sites put forward in the Outer North East HMCA through the first publication draft consultation on the Site Allocations Plan

3.2 Housing

3.2.1 The Core Strategy sets a target of 74,000 new dwellings to be delivered over the lifetime of the plan with an allowance of 8,000 dwellings expected through windfall delivery. The remainder will be provided through site allocations and identified sites. Spatial Policy 7 outlines the distribution of these dwellings throughout Leeds. Safeguarded land will also be identified. The table below shows the distribution throughout Leeds and forms the basis for each of the HMCA chapters.

Housing Market Characteristic Area	Number	Percentage
Aireborough	2,300	3%
City Centre	10,200	15.5%
East Leeds	11,400	17%
Inner Area	10,000	15%
North Leeds	6,000	9%
Outer North East	5,000	8%
Outer North West	2,000	3%
Outer South	2,600	4%
Outer South East	4,600	7%
Outer South West	7,200	11%
Outer West	4,700	7%
Total	66,000	100%

3.2.2 The Core Strategy requirement will be met through the Site Allocations Plan and the Aire Valley Leeds Area Action Plan. The target for Outer North East HMCA is 5,000.

3.3 Employment

- 3.3.1 The Core Strategy outlines a need for further employment land throughout the lifetime of the plan. Unlike housing this requirement is district wide rather than being split into areas across the city. For general employment (B2-B8 uses) a minimum of 493 hectares is required. For Office development the Core Strategy has a target of 1m sqm of floorspace
- 3.3.2 Land to meet these targets will be identified and allocated in the Site Allocations Plan and the Aire Valley Leeds Area Action Plan. The employment sites to meet this need are included in the relevant HMCA chapters alongside the housing for consistency in the methodology, however, area based targets are not provided.
- 3.3.3 Employment uses are considered less vulnerable to flood risk than housing, so employment use may be decided to be a preferable alternative to housing use on a site with high flood risk. The sequential test for employment sites measures against city-wide and Aire Valley requirements for general employment land and office space.

3.4 Safeguarded Land

- 3.4.1 To ensure the necessary long-term endurance of the Green Belt, definition of its boundaries is accompanied by designation of Safeguarded Land to provide land for longer-term development needs. Allocating this land will ensure the necessary long term endurance of the Green Belt.
- 3.4.2 The Core Strategy requires 10% of the land to be identified or allocated for housing to be reserved as Safeguarded Land. This means land for 6,600 dwellings needs to be designated as Safeguarded Land district wide. But the Core Strategy gives no guide to the distribution of Safeguarded Land between HMCAs. As Safeguarded Land enables the permanence of the green belt boundary to be maintained, it can only be located in the outer areas that have substantive areas of green belt. The urban HMCAs including the city centre cannot provide Safeguarded Land.
- 3.4.3 Safeguarded Land is not proposed for development within the plan period.

3.5 Flood risk source

- 3.5.1 A number of towns and villages are at risk of flooding from rivers within the District, including along the River Wharfe in the Outer North East HMCA. Some locations are also at risk of flooding from non-fluvial sources, for example where drainage infrastructure is inadequate or where topography and soil conditions mean that downpours cause localised flooding. This is known as surface water flooding. It is also a consideration in the application of the sequential test.

3.6 Flood Risk Zones in which the allocated sites are located

- 3.6.1 Land affected by proposed site allocations lie within the following Flood Risk Zones identified in the Leeds SFRA: 1, 2, 3ai and 3aii and Environment Agency zones 2 & 3a.

4 THE SEQUENTIAL TEST

4.1 Background

4.1.1 As set out in the National Planning Policy Framework, the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Where there are no reasonably available sites in Flood Zone 1, local planning authorities allocating land in local plans should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of sites in Flood Zone 3, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

4.1.2 Within each Flood Zone, new development should be first directed to sites at the lowest probability of flooding and the flood vulnerability of the intended use matched to the flood risk of the site e.g. higher vulnerability uses located on parts of the site at lowest probability of flooding.

4.2 Methodology

4.2.1 The Site Allocations plan will allocate land for a number of primary uses. This will include housing, employment and mixed use developments. The plan has requirements for the amount of land or number of units to be developed for residential and general employment uses, which can be used as the basis for applying the sequential test.

Assumptions used

- i. The Leeds area will identify and allocate a minimum of 66,000 (plus additional safeguarded Land) new homes over the plan period as set out in the Core Strategy for Leeds;
- ii. The Leeds area will identify and allocate 493 hectares of land general employment use as set out in the Core Strategy for Leeds;
- iii. The Leeds area will identify and allocate 1m sqm of office floor space based on a centres first approach;
- iv. Sites which have been assessed as unsuitable and discounted prior to the flood risk assessment (reasons include being outside the settlement hierarchy; wholly within an area of high flood risk – zone 3b (functional floodplain in the SFRA); wholly within a Site of Special Scientific Interest (SSSI) or national nature conservation designation (ancient woodland); within minerals safeguarded sites; within the Airport Safety Zone; fall outside the settlement hierarchy) will be listed for information but not assessed;
- v. Sites that the City Council decide not to allocate in the Publication Plan will be listed with the reason for not allocating. As necessary an appraisal will be made of whether non-allocated sites would be suitable and deliverable instead of sites proposed for allocations that do flood.

4.2.1 Surface Water Flooding

Surface water flooding occurs when the rainfall intensity exceeds the ability of the ground to absorb the water and when the drainage system is at full capacity. It commonly occurs during

high intensity, short duration, rainfall. The resulting flooding is more often localised in nature, rather than wide scale flooding usually associated with river (fluvial) flooding.

The Environment Agency has undertaken modelling of surface water flood risk at a national scale and produced mapping identifying those areas at risk of surface water flooding during three annual probability events: 3.3% AEP (1 in 30 chance of flooding in any one year), 1% AEP and 0.1% AEP. The latest version of the mapping is available on the Environment Agency website, and is referred to as 'Risk of Flooding from Surface Water'. The data for the Outer North East HMCA is presented in a map at the end of this paper. Additional flood risk mitigation measures, such as raised floor levels, may be required for sites that are shown to be at risk from surface water flooding. This should be addressed within the developer's Flood Risk Assessment.

All sites within the Plan are required to comply with the Council's Policy WATER 7 of the Natural Resources and Waste Local Plan regarding the need to reduce the rate (L/s) of surface water run-off from the site, post-development.

4.3 Housing

- 4.3.1 Sites that are not suitable for allocation are listed first in table 1 and the reason given, for example, the site may not fit with the settlement hierarchy in the Core Strategy. Table 2 shows sites within Flood Zone 1 as these are sequentially preferable sites. These will not be subject to any further assessment. Where the number of dwellings required for the HMCA cannot be accommodated on Zone 1 sites there will be a sequential basis to include sites from the next level of flood risk. If the required number of dwellings still cannot be accommodated, there will be a sequential basis to include sites from the next level of flood risk, and so on.
- 4.3.2 Housing sites will be assessed sequentially according to the extent of site area prone to flood risk. Where no part of a site, or a negligible part of a site (less than 2%) falls within EA Zones 2 or 3, the site will be categorised as a Zone 1 site with no flood risk. The 2% threshold is used because in most cases such small areas of flood risk could be eliminated by a re-draft of the site boundary. Nevertheless, development of these sites, particularly very large sites where 2% of land area could be significant, must be subject to careful layout and design to avoid placing housing over the small areas of high flood risk and to ensure development on low flood risk areas of land does not exacerbate the risk of flooding on adjacent land.
- 4.3.3 After Zone 1, the next best category of sites will be those with such a small area of flood risk that a typical housing development could take place on the part of the site that does not flood. Assumptions about net developable areas of sites have already been made in Leeds' Strategic Housing Land Availability Assessment from which dwelling capacities for sites in the Site Allocations Plan have been derived. For large sites (2ha or more) the assumption is that 25% of the site area will not have dwellings built on and for small sites (less than 2ha) the assumption is that 10% of the site area will not have dwellings built on. Nevertheless, development of these sites must be subject to careful layout and design to avoid placing housing over the small areas of high flood risk and to ensure development on low flood risk areas of land does not exacerbate the risk of flooding on adjacent land.
- 4.3.4 After the category of sites with a small amount of land prone to flood risk (less than the SHLAA thresholds), the next best category of sites will be those with EA Zone 2 flood risk. The extent of

land in Zone 2 flood risk will exceed the SHLAA thresholds, but will not include land in Zone 3 above the SHLAA threshold.

- 4.3.5 After the Zone 2 category, the next best category of sites will be Zone 3ai. Again, the SHLAA thresholds will determine which sites qualify for this category. Distinguishing between Zones 3ai and 3aii requires use of Leeds' Strategic Flood Risk Assessment Data (SFRA 2007). Where the more recent EA data suggests that a site has a greater extent of Zone 3 flood risk than SFRA data, a brief assessment will be made to determine how much of the site would fall within 3ai and 3aii.
- 4.3.6 After the Zone 3ai category, the next and final category of sites will be Zone 3aii. The same method of categorisation will apply as explained for Zone 3ai above.

4.4 Employment

- 4.4.1 This methodology concerns employment sites throughout the whole of the Leeds district as there is no specific target for the Outer North East HMCA. The Core Strategy sets separate district wide targets for both offices and general employment, therefore the sequential test assesses these categories of employment separately.

General Employment

- 4.4.2 General employment use is one of the less vulnerable uses and in that respect will often be preferable to housing use on land that has higher risk of flood.
- 4.4.3 The Publication Draft Plans (Aire Valley Leeds AAP and Site Allocations Plan DPD) propose a supply of general employment (496.37ha) which exceeds the Core Strategy requirement (493ha) by 3.37ha. The data for this is set out in the Publication Draft Site Allocations Plan at paragraph 2.84. This is quite a small margin (less than 1%) which could easily reduce further as a number of proposed general employment allocations are subject to proposals for other uses. This means that there is little scope to avoid including sites with high flood risk. The general employment sites being advanced in the Site Allocations Plan (Publication Version) are set out in Table E1 below. Essentially, these sites have passed the Flood Risk Sequential Test. The sites are listed according to the extent of flood risk using the combined total of the Environment Agency's flood data for flood zones 2 and 3. Please note that some sites are already allocated in the Natural Resources and Waste Plan (NRW) which are included because their development potential will count towards the Core Strategy General Employment requirement.
- 4.4.4 The City Council has appraised sites against national planning policy tests of whether they are *suitable* and *available* for employment development. As a result some sites are not being proposed as employment allocations. Table E2 below sets out the reasons for why the sites were not proposed for allocation. It is divided into Part A concerning sites not allocated that have low flood risk and Part B which are sites that have more than 20% of their areas in high flood zones (using the total area of the Environment Agency's zones 2 and 3), so would not have any flood risk advantages over the sites that are being proposed for allocation in the Plans. In terms of Part A, the most common reasons were that sites were not available, often because the land was already in use for employment, or because the land had been taken for other uses, including housing, retail and other miscellaneous uses. Some sites were not suitable because of access problems.

Offices

- 4.4.5 Offices are a less vulnerable use than housing, and will often be preferred on sites of high flood risk in suitable town centre locations. It should be noted that the Site Allocations Plans are proposing a number of mixed use allocations for a combination of offices and residential, particularly in the City Centre. For the purposes of the flood risk sequential test, where mixed use proposals involve residential these are dealt with under the housing sequential test.
- 4.4.6 The Core Strategy has a requirement for 1 million square metres of office floorspace to be planned for during the 2012 – 2028 Plan Period over the Leeds district. The amount of office floorspace associated with mixed residential sites (allocated and identified) comes to 763,426sqm. Combined with the total floorspace of the proposed single use allocations and identified sites (see Table E3 below) of 292,947sqm, the requirement is exceeded by 61,283sqm. In flood risk terms this surplus does not necessarily mean that the office sites that are in the highest flood zones need to be deleted. There are other factors which need attention.
- 4.4.7 As well as the flood risk sequential test, offices are also subject to a “centres first” sequential test. A key strand of national and local planning policy is to give priority to location of new offices in city and town centres. If land is available in-centre, this should be preferred to edge-of-centre locations and if land is available edge-of-centre, this should be preferred to out-of-centre locations. This significantly reduces the availability of suitable locations for new office development; most out-of-centre locations have to be rejected as contrary to national and local planning policy.
- 4.4.8 There are strong sustainability advantages for locating offices in-centre, particularly in the city centre. Offices have a higher employee/floorspace ratio than all other employment uses, so it is important to try to reserve the locations with the best public transport and proximity to labour markets for office development.
- 4.4.9 Looking at the 41 sites identified and allocated for office use (without residential mixed use) in Table E3, only 14 have flood risk above 10% of site area. Of these 11 are identified permitted sites, leaving only 3 allocations which the City Council can choose whether to include in the Allocation Plans. These are Hunslet Lane Hunslet Leeds, Kirkstall Road Car Park and Wellington Road / Gotts Road. All three sites are in Leeds City Centre which benefit from passing the town centres sequential test and from the sustainability advantages of offices in town centre locations. As such, alternative employment proposals in Outer North East do not affect those sites proposed for office use in the wider Site Allocations and Aire Valley Leeds Plans and therefore the sites are considered to have passed the flood risk sequential test.
- 4.4.10 Looking at the sites considered for, but not being allocated for office use in low flood risk zones to see if any would be better than the proposed office allocations that flood (Table E4a) the majority are simply not available; others are not suitable because of being in an out-of-centre location. Also, for completeness, sites not being allocated for office use in high flood risk zones are also set out in Table E4b.

5 THE EXCEPTION TEST

5.1 Introduction

5.1.1 The NPPF requires the Exception Test to be applied to housing sites when, following the application of the Sequential Test, it is not possible for the development to be located in zones of lower probability of flooding. The NPPF (Para 102) sets out the two roles of an Exception Test:

- *it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk;*
- *a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall*

5.1.2 The Outer North East HMCA is affected by flooding from the River Wharfe and therefore it is difficult to meet the target for growth in that area without taking some land that is entirely or partially located within flood risk zones 2 or 3 and that, in terms of the settlement hierarchy, the Core Strategy places a focus on as being particularly sustainable. Sites being allocated for housing use in flood zone 3 are required to pass an Exception Test which will explore the wider sustainability benefits including:

- High accessibility by public transport, walking and cycling
- Regeneration of deprived areas
- Bringing brownfield land back into use (achieving the Core Strategy targets for PDL)
- Improving the appearance of neglected unattractive land
- Economic growth
- Provision of employment where it is needed

5.1.3 Some of the sites that have passed the Sequential Test and require an Exception Test only have a small part of the site in zone 3a. Where the proportion of the site in zone 3a is less than the SHLAA thresholds of 10% for sites under 2ha or 25% for sites over 2 ha then it is likely that the zone 3a flood risk area can be avoided in the layout of the site. On this basis those sites have not been subjected to the Exception Test. These sites are listed in Table 3 of the Exception Test. It is essential that any planning application for housing or more vulnerable uses takes a sequential approach to the layout of the site which shows that the development avoids zone 3a.

6. OUTER NORTH EAST SEQUENTIAL AND EXCEPTION TESTS

Housing sites

This part of the flood risk sequential test looks at the sites as proposed for the revised Publication Draft for the Outer North East HMCA September 2016. Previously the City Council considered flood risk for the sites under consideration at the Issues and Options stage of the Plan and the Publication Draft September 2015.

Core Strategy Spatial Policy 7 sets the distribution of housing land throughout the city. For the Outer North East HMCA 5,000 dwellings are required (8% of the District wide total).

Employment sites including future office development do not have a local area based target and are assessed on a district wide basis.

SITE ASSESSMENT

Consideration of all possible sites for each Housing Market Characteristic Area (HMCA) is presented using the following order. Firstly sites *not* proposed for allocation followed by those that are expected to make a contribution to meeting needs. These include sites “identified” and sites “proposed for allocation”. Identified sites are either UDP allocations being carried forward or sites with extant planning permission. Sites proposed for allocation are new sites.

An essential part of the sequential test involves looking at how much land of each site falls into areas of flood risk. The Environment Agency has updated their modelling since the preparation of the Strategic Flood Risk Assessment which is dated 2007. The tables below therefore refer to the Environment Agency data (27th May 2015) to establish percentages of sites falling within relevant flood zones. However, the EA data does not subdivide zone 3, so the SFRA data and subdivisions will be considered when assessing sites where all or a meaningful part of the site falls within flood zone 3. Maps illustrating the flood zone areas will use the SFRA data to highlight the further separation of flood zone 3a.

Sites not proposed for allocation

Sites considered through the Issues and Options stage of plan preparation but that the City Council is *not* proposing to allocate are listed along with their level of flood risk. These sites have been rejected for allocation for a variety of sound planning reasons. These sites are listed in Table 1, and are only subject to further analysis where the HMCA housing target cannot be met on sites or parts of sites that do not flood. For each HMCA, sites not allocated for employment or housing that have a meaningful proportion of site area in flood zones EA2 and/or EA3 are listed first. Such sites have no sequential advantage over sites that are being proposed for allocation, so can be discounted. The remainder of the sites not being allocated have low or no flood risk. The reasons for these sites not being allocated are appraised to see if the need to avoid use of sites that flood might be overriding. In Outer North East by far the most common reason for not allocating is isolation away from the Settlement Hierarchy with sprawl into the Green Belt being the second most common reason. Other suitability reasons for non-allocation include access problems, tree cover, local flooding, greenspace designation, impact on historical monuments, blight from HS2 and steep topography. Also, some sites are not available because of current use for employment, allocation not supported by owners, development completed and

sites being too small. Hence, there is no opportunity to consider bringing forward any of these sites instead of proposed sites that do have flood risk.

The next part of this assessment concentrates on sites that are being counted on for delivery of housing or employment to meet the Core Strategy targets for the Outer North East HMCA.

Table 1: List of sites not proposed for allocation

Site Ref	Address	Status	Sieved out	Units	Ha	EA2	EA3	EA SUM	SFR 2	SFR 3ai	SFR 3aii	SFR 3b	RI
5158	Meadowside Keswick Lane Bardsey	Not allocated as housing		11	0.4	99.73	0.27	100	100	0.27		0.18	
Green Belt site. Flood risk concerns. Also significant ecology concerns given the close proximity to Bardsey Beck. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.													
1040	Carr Lane, Thorne, LS14	Not allocated as housing	Y	13	0.5	15.84	74.45	90.29	29.61	27.91			
Sieved out - Not within the settlement hierarchy													
1131	Field Lane (south of), Aberford	Not allocated as housing	Y	22	0.8	48.12	35.49	83.61	35.65	35.47		24.02	
Sieved out - Not within the settlement hierarchy and part SFRA floodzone 3b													
3310	Land Boston Road, Wetherby	Not allocated as housing		53	1.5	7.43	53.29	60.72	94.24	52.83		48.71	
Piece of open land adjacent to the river which adds to the character of the conservation area. The site slopes significantly down towards the river. Flooding issues as the majority of the site lies within flood zones 3b (washland) and 3a (high risk). The site also has very poor access.													
3319	Main Street, Aberford	Not allocated as housing	Y	28	1	2.8	41.3	44.1	38.82	30.37			
Sieved out - Not within the settlement hierarchy													
5142	Land north of A58 Wetherby	Not allocated as housing	Y	354	13.5	9.98	26.63	36.61	39.26	30.41		28.78	
Green Belt site. The site in isolation would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment. Significant ecology concerns given the presence of a SEGI													
3134	Woodacre Lane, Bardsey	Not allocated as housing		205	9.1	10.6	14.63	25.23	25.23	14.63		12.48	
Green Belt site. The beck and mature tree line create a strong boundary to the east between the built up area and the site. The surrounding road network is narrow and there are significant Highways concerns. The site also lies adjacent to a conservation area and Motte and Bailey, Castle Hill Ancient Monuments. In addition the site is situated on a significant slope and as a consequence any development would be very prominent within the landscape. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.													
1251	Leeds Road, Collingham LS22	Not allocated as housing		101	4.5	5.53	15.71	21.24	21.24	15.72		13.78	
Green Belt site. In isolation the site would have an unacceptable impact on the Green Belt as it would form an isolated development and not round off the settlement. The southern part of the site is also within an area of high flood risk and the site requires the adjacent site to the east for access. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.													
1106	First Avenue (land west of), Bardsey	Not allocated as housing		315	14	11.07	9.37	20.44	19.23	9.37		6.49	
Green Belt site which splits Bardsey from Bardsey Village. Surrounded by residential development on three sides. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.													
1233	York Road (land at)- Sandbeck Lane, Wetherby, LS22	Not allocated as housing		1047	39.9	2.3	11.62	13.92	13.93	11.62			
The site is not within the Green Belt, however it is open countryside which is currently safeguarded by rural land policy (RL1) within the UDP. The site is isolated from the main urban area of Wetherby with limited access across the A1(M) which creates a significant barrier to the existing settlement of Wetherby. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.													
1070	Linton Lane - Cragg Hall Farm, Wetherby LS22	Not allocated as housing		32	1	13.3	0	13.3	23.21				

Green Belt site. The site is well related to the existing settlement and development would constitute 'rounding off' of the existing settlement. However, the site is not available for residential development given the recent planning permission and construction of a large single dwelling in the middle of the site.										
1005	Wetherby Road, Scarcroft	Not allocated as housing	Y	412	18.3	1.1	9.49	10.59	10.58	9.46
Sieved out - Not within the settlement hierarchy										
5001	Thorner Lane, Scarcroft	Not allocated as housing	Y	55	2.5	1.94	7.33	9.27	9.27	7.39
Sieved out - Not within the settlement hierarchy										
2068	Thorp Arch Estate Waste Tip, Wetherby LS23	Not allocated as housing	Y	227	10.1	6.5	2.73	9.23	8.4	8.28
Sieved out - Not within the settlement hierarchy										
1367	Rakehill Road (land north of), Barwick in Elmet	Not allocated as housing		34	1.3	0.14	6.63	6.77	14.73	12.41
Green Belt site. Development of this site alone would not relate well to the existing settlement form and would have an unacceptable impact on the Green Belt										
1301	Linton Lane - Wetherby Golf Course house and car park, Wetherby LS22	Not allocated as housing		19	0.6	5.4	0	5.4	41.47	
Green Belt site. The site is not related to the existing settlement given that site 1070 is situated between the site and the existing built up area. (It is noted that site 1070 presently contains one detached dwelling, however this was deemed to be appropriate within the Green Belt.) No defensible boundary is present to the south side of the site which could lead to further unrestricted sprawl into Green Belt. The site currently contains a golf clubhouse and car park, which is acceptable, appropriate development in the Green Belt. Development of the site would therefore also result in the loss of a community facility given that the clubhouse would have to be demolished.										
2158	Sandbeck wood (south of), Wetherby	Not allocated as housing		141	5.4	0.73	2.68	3.41	3.42	2.69
The site is not within the Green Belt, however it is open countryside which is currently safeguarded by rural land policy (RL1) within the UDP. The site is isolated from the main urban area of Wetherby with limited access across the A1(M) which creates a significant barrier to the existing settlement of Wetherby. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.										
1294	Leeds Road (land at), Collingham LS22	Not allocated as housing		121	5.4	0.14	3.17	3.31	3.29	3.18
Green Belt site. The southern part of the site juts out from the existing settlement form and has no defensible boundary containing it, which could set a precedent for further sprawl into Green Belt. Highways concerns raised due to the narrow road frontage and poor accessibility to services.										
1027	Wetherby Road (land to west), south of Bardsey	Not allocated as housing		565	25.1	2.8	0.16	2.96	2.96	0.17
Green Belt site. Development of this relatively large site would result in the merging of two settlements (Scarcroft and Bardsey). Highways concerns regarding access onto Wetherby Road.										
1094A	Red Hall Lane and Manston Lane (between)	Not allocated as housing		0	377.7	0.24	2.23	2.47	1.1	0.92
Very large Green Belt site. Development of the site would not be acceptable in Green Belt terms as it would result in significant sprawl, coalescence of the urban conurbation of Leeds with Scholes and fail to safeguard the countryside from encroachment. Significant highway concerns relating to access, impact on local network and relationship to the proposed East Leeds Orbital Route.										
1157	Old Mill Lane (land to south of), Clifford LS23	Not allocated as housing	Y	35	1.3	2.39	0	2.39	1.18	
Sieved out - Not within the settlement hierarchy										
1107	Green Lane (land east of), Boston Spa LS23	Not allocated as housing		249	9.5	0.83	0	0.83	0.83	
Green Belt site. The development of the site is considered to have an unacceptable impact on the Green Belt in terms of sprawl to the south-east of Boston Spa and safeguarding the countryside from encroachment.										
3125	Carr Lane, Wetherby	Not allocated as housing		59	2.3	0.74	0	0.74	0.74	

The site is not within the Green Belt, however it is open countryside which is currently safeguarded by rural land policy (RL1) within the UDP. The site is isolated from the main urban area of Wetherby with limited access across the A1(M) which creates a significant barrier to the existing settlement of Wetherby. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
4176	High Street, Boston Spa	Not allocated as housing	66	2.5	0.25	0	0.25	3.16	
Green Belt site. The site in would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
3334	Land South of A58 Collingham	Not allocated as housing	142	6.3	0.08	0	0.08	0.08	
Green Belt site. The development of the site would constitute a significant encroachment into the Green Belt. The site is detached from the settlement of Collingham, unless adjacent sites are developed first. The site is further separated from the northern part of Collingham by Collingham Beck. The site boundary does not follow any field boundaries so no strong defensible boundaries currently exist. Highways concerns regarding access.									
1300	Linton Lane - land opposite the Ridge, Linton LS22	Not allocated as housing	54	1.7	0.01	0	0.01	0.01	
Sieved out - Not within the settlement hierarchy									
70	Linton Spring (office building), Sicklinghall Road, Wetherby	Not allocated as housing	12	0.4	0	0	0		
Sieved out site - Not within the settlement hierarchy									
78	Blackmoor Lane (120), Bardsey LS17 9DZ	Not allocated as housing	25	0.9	0	0	0		
Sieved out site - Not within the settlement hierarchy									
361	Spofforth Hill (land at), Wetherby LS22 6SF	Not allocated as housing	34	0.9	0	0	0		
Site in current residential use. Allocation of the site is not supported by the owners.									
789	Oaks Lane, Boston Spa	Not allocated as housing	18	0.5	0	0	0		
Site not available. Previous consent for residential development fully built out.									
830	Thorner Lane - Oaklands Manor, Scarcroft	Not allocated as housing	14	0.5	0	0	0		
Sieved out - Not within the settlement hierarchy									
1001	Tarn Lane - Brandon Hall LS17	Not allocated as housing	86	3.8	0	0	0		
Sieved out - Not within the settlement hierarchy									
1028	Wetherby Road (land to west), north of Scarcroft	Not allocated as housing	288	12.8	0	0	0		
Sieved out - Not within the settlement hierarchy									
1031	Sandhills (land to east), Thorer	Not allocated as housing	37	1.4	0	0	0		
Sieved out - Not within the settlement hierarchy									
1048	Main Street (north of), Aberford LS25	Not allocated as housing	20	0.7	0	0	0		
Sieved out - Not within the settlement hierarchy									
1055A	Thorpe Arch Estate, Wetherby LS23 7BJ	Not allocated as housing	2161	96	0	0	0		
Large brownfield site with current employment and retail uses. Local preference for the site to be allocated for employment uses rather than housing but potential for mixed use to include housing.									

1055B	Thorpe Arch Estate, Wetherby LS23 7BJ	Not allocated as housing	1455	64.6	0	0	0		
Large brownfield site with current employment and retail uses. Local preference for the site to remain in employment use but potential for mixed use to include housing									
1056	Main Street (off) - Cricket Field, Shadwell	Not allocated as housing	49	1.8	0	0	0		
Sieved out - Not within the settlement hierarchy									
1057	Scholes Lane, Scholes	Not allocated as housing	20	0.7	0	0	0		
Green Belt site. The development of the site would result in an unacceptable impact on the Green Belt. The development of the site would represent sprawl to the west of Scholes.									
1088	Whinmoor Lane, land to rear of Wainscott Cottage, Shadwell, LS17 8LS	Not allocated as housing	58	1.8	0	0	0		
Sieved out - Not within the settlement hierarchy									
1089	York Road - Homecroft, Scholes LS15 4NF	Not allocated as housing	54	2.4	0	0	0		
Green Belt site. Not favoured for residential use as the site is isolated from the built up area of Scholes with barriers in between. The site has recent planning permission for employment uses.									
1108	Willow Lane (land west of), Clifford LS23	Not allocated as housing	20	0.6	0	0	0		
Sieved out - Not within the settlement hierarchy									
1109	Cinder Lane (land west of), Clifford, LS23	Not allocated as housing	82	3.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
1121	Trip Lane (land at), Linton	Not allocated as housing	47	2.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
1130	Parlington Lane (land off)	Not allocated as housing	45	1.7	0	0	0		
Sieved out - Not within the settlement hierarchy									
1132	Lotherton Lane (land south of)	Not allocated as housing	12	0.4	0	0	0		
Sieved out - Not within the settlement hierarchy									
1134	Aberford Road, Barwick LS15	Not allocated as housing	141	6.2	0	0	0		
Green Belt site. The development of the site is considered to have an unacceptable impact on the Green Belt in terms of sprawl. The site would be a significant incursion into the Green Belt to the east of Barwick and could not be considered to round off the settlement.									
1139	York Road, Morwick Hall (land adj to), Whinmoor, LS15	Not allocated as housing	311	13.8	0	0	0		
Green Belt site which relates poorly to existing development. The development of the site for residential use would be unacceptable in Green Belt terms as it would adjoin the East Leeds Extension to its west boundary and would represent significant sprawl which is not well contained. The site would also significantly reduce the Green Belt gap between the urban conurbation of Leeds and Scholes.									
1155	Bramham Road and North of Lyndon Road (land to west of), Bramham LS23	Not allocated as housing	269	12	0	0	0		
Green Belt site. The development of the site would have an unacceptable impact on the Green Belt in terms of sprawl to the north of Bramham and safeguarding the countryside from encroachment.									
1156	Bramham Road (land to east of), Clifford	Not allocated as housing	90	4	0	0	0		

Sieved out - Not within the settlement hierarchy									
1158	Boston Road (land to west of), Clifford LS23	Not allocated as housing	Y	33	1	0	0	0	
Sieved out - Not within the settlement hierarchy									
1161	Parlington Drive (west of), Aberford LS25	Not allocated as housing	Y	60	2.7	0	0	0	
Sieved out - Not within the settlement hierarchy									
1162	Parlington Drive (east of), Aberford, LS25	Not allocated as housing	Y	62	2.8	0	0	0	
Sieved out - Not within the settlement hierarchy									
1163	Main Street - Beckside, Aberford LS25	Not allocated as housing	Y	24	0.9	0	0	0	
Sieved out - Not within the settlement hierarchy									
1164	Richmondfield Lane (land at) - Long Lane LS15	Not allocated as housing		161	7.2	0	0	0	
Green Belt site. The site relates poorly to the existing settlement. The development of the site for residential development would have an unacceptable impact on the Green Belt in terms of significant sprawl and safeguarding the countryside from encroachment. The site also has poor access and a beck splits the site into two parcels.									
1165	Barwick Road (land north of), Garforth	Not allocated as housing		0	9.7	0	0	0	
Green Belt site. The site in isolation would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment. The site also lies within the proposed HS2 route which would have a significant impact on its deliverability. Major site 1232B to east of Garforth chosen on balance as a better site for development than the combined sites to the east/north of Garforth.									
1182	Woodlands Farm (land at), Syke Lane, Scarcroft LS14	Not allocated as housing	Y	25	0.9	0	0	0	
Sieved out - Not within the settlement hierarchy									
1226	Nanny Goat Lane (land north of) and adjacent to M1, Garforth LS25	Not allocated as housing		0	17.4	0	0	0	
Green Belt site. The site in isolation would have an unacceptable impact on the Green Belt in terms of sprawl and safeguarding the countryside from encroachment. The site also lies within the proposed HS2 route which would have a significant impact on its deliverability. Highways access concerns due to narrow bridge into Garforth. Major site 1232B to east of Garforth chosen on balance as a better site for development than the combined sites to the east/north of Garforth.									
1239	Dowkell Lane (land south of), Thorp Arch LS22	Not allocated as housing	Y	150	5.7	0	0	0	
Sieved out - Not within the settlement hierarchy									
1240	Church Causeway (land north of), Thorp Arch	Not allocated as housing	Y	128	4.9	0	0	0	
Sieved out - Not within the settlement hierarchy									
1241	Walton Road (land at), Thorp Arch LS22	Not allocated as housing	Y	233	8.9	0	0	0	
Sieved out - Not within the settlement hierarchy									
1252	Northgate Lane, Linton LS22	Not allocated as housing	Y	52	2.3	0	0	0	
Sieved out - Not within the settlement hierarchy									
1262	Roundhay Park Lane, Sandy Lodge (site of) LS17 8AS	Not allocated as housing		31	1	0	0	0	
Green Belt site. Site is well related to the settlement and would round off the settlement. However, the site lies adjacent to a cluster of listed buildings and is not required to meet the housing numbers due to local preference for an alternative strategic option.									

1271	Rakehill Road (land off), Scholes, LS15	Not allocated as housing	2528	112.3	0	0	0		
Large Green Belt site which is out of scale with the existing settlement. The development of the site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment.									
1286	Colliers Lane (land off), Shadwell, LS17	Not allocated as housing	72	3.2	0	0	0		
Sieved out - Not within the settlement hierarchy									
1287	Blind Lane (land at), Shadwell, LS17	Not allocated as housing	60	2.7	0	0	0		
Sieved out - Not within the settlement hierarchy									
1288	Manor Farm (land at), Shadwell, LS17	Not allocated as housing	294	13.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
1289	Dowkell Lane (land north of), Thorpe Arch, Boston Spa	Not allocated as housing	317	12.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
1290	Thorpe Arch - The Vicarage (land to rear of), Boston Spa	Not allocated as housing	25	0.8	0	0	0	0.02	
Sieved out - Not within the settlement hierarchy									
1291	Lilac Farm (land at), Lilac Farm, Collingham LS22	Not allocated as housing	183	8.1	0	0	0	2.52	2.53
Green Belt site. The development of the site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment.									
1292	Jewitt Lane (paddock at), Collingham, LS22	Not allocated as housing	31	1.1	0	0	0		
The site is within the existing settlement of Collingham, not within the Green Belt. However, Highways concerns regarding access to the site and the existing highway network. The site slopes significantly and mature trees surround the narrow entrance to the existing dwelling on site which reduces development potential.									
1293	Harewood Road (land at), Collingham LS22	Not allocated as housing	103	4.6	0	0	0		
Green Belt Site. Site is steeply sloping. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
1304	Larumrise (land to the west of), off Willow Lane, Clifford LS23	Not allocated as housing	56	2.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
1309	Linton Lane (land to the rear of) LS22	Not allocated as housing	92	3.5	0	0	0		
Sieved out - Not within the settlement hierarchy									
1315	Holywell Lane / Bridle Path Road (land to east of), Shadwell LS17	Not allocated as housing	50	2.2	0	0	0		
Sieved out - Not within the settlement hierarchy									
1316	Bridle Path Road (land to north of), Shadwell, LS17	Not allocated as housing	33	1.2	0	0	0		
Sieved out - Not within the settlement hierarchy									
1324	Ling Lane - Stonecroft LS17 9JN	Not allocated as housing	22	0.8	0	0	0		
Sieved out - Not within the settlement hierarchy									

1329	Blackmoor Lane (land to north of), Bardsey, Leeds	Not allocated as housing	y	32	1.2	0	0	0		
Sieved out - Not within the settlement hierarchy										
1368	Rakehill Road (land south of), Barwick in Elmet	Not allocated as housing		71	3.1	0	0	0		
Green Belt site, adjoining the existing settlement on two sides. However, concerns regarding potential harm to the setting of the scheduled ancient monument and the conservation area. Highway concerns regarding poor access and narrow local roads. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.										
2059	Oakhill Cottage Farm, Shadwell LS17	Not allocated as housing		363	13.8	0	0	0		
Green Belt site. The site is an important gateway into the countryside from the ring road, with views from the ring road giving the edge of the main urban area a 'rural feel'. The northern boundary is connected to the existing settlement but the west and eastern boundaries are open, so the site does not relate well to the existing settlement form and is unacceptable in terms of Green Belt impact. Highway concerns regarding poor accessibility.										
2067	Thorp Arch Grange, Wetherby LS23	Not allocated as housing		16	0.6	0	0	0		
Sieved out - Not within the settlement hierarchy										
3019	Land off Whinmoor Lane Shadwell	Not allocated as housing	y	92	4.1	0	0	0		
Sieved out - Not within the settlement hierarchy										
3020	Land at Elmete Lane Shadwell	Not allocated as housing	y	50	2.2	0	0	0		
Sieved out - Not within the settlement hierarchy										
3114	Barwick Road, Garforth	Not allocated as housing		38	1.2	0	0	0		
Green Belt site. Proposed HS2 rail route runs to the north of the site. The site is very isolated from the main settlement. The development of the site would have an unacceptable impact on the Green Belt in terms of sprawl and protecting the countryside from encroachment. Highways concerns re access - route to Garforth constrained by narrow railway bridge and access to the site itself is down a narrow unadopted road. Major site 1232B to east of Garforth chosen on balance as a better site for development than the combined sites to the west/north of Garforth.										
3126	Syke Lane, Scarcroft	Not allocated as housing	y	31	1.1	0	0	0		
Sieved out - Not within the settlement hierarchy										
3127	Wetherby Road, Scarcroft	Not allocated as housing	y	114	5.1	0	0	0		
Sieved out - Not within the settlement hierarchy										
3128	Land west of Deepdale Lane, Boston Spa	Not allocated as housing		59	2.2	0	0	0		
Green Belt site. No defensible boundary to the west of the site which could set a precedent for further sprawl. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.										
3129	Moor End, Boston Spa	Not allocated as housing		65	2.5	0	0	0		
Green Belt site. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.										
3130	Primrose Lane (west), Boston Spa	Not allocated as housing		96	3.7	0	0	0		
Green Belt site. Development would result in the crossing of Primrose Lane which is currently a strong defensible boundary, which could set a precedent for further sprawl which would reduce the Green Belt gap between Boston Spa and Clifford.										
3131	Primrose Lane (east), Boston Spa	Not allocated as housing		49	1.6	0	0	0		
Green Belt site. Development would result in the crossing of Primrose Lane which is currently a strong defensible boundary, which could set a precedent for further sprawl which would reduce the Green Belt gap between Boston Spa and Clifford.										

3133	Woodacre Lane (north), Bardsey	Not allocated as housing	47	1.7	0	0	0		
Green Belt site. The site is situated on a very steep slope. Highways raise concerns due to lack of access options and poor accessibility. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
3135	Land south of Wetherby Race Course (adj to Race Course)	Not allocated as housing	450	17.2	0	0	0		
The site is not within Green Belt, however it is open countryside which is currently safeguarded by rural land policy (RL1) within the UDP. The development of the site is reliant on the development of 3136 for access. Development of the site would be unrelated to the existing settlement and represent a significant incursion into open countryside extending to the southeast of Wetherby. Presently the A1(M) forms a strong defensible boundary between the urban area and the countryside. The site would be isolated from the main urban area of Wetherby with very limited access across the A1(M) which creates a significant access barrier to the existing settlement.									
3136	Land south of Wetherby Race Course, Walton Road	Not allocated as housing	898	34.2	0	0	0		
The site is not within Green Belt, but is open countryside which is currently safeguarded by rural land policy (RL1) within the UDP. Development of the site would be unrelated to the existing settlement and represent a significant incursion into open countryside extending to the southeast of Wetherby. Presently the A1(M) forms a strong defensible boundary between the urban area and the countryside. The site would be isolated from the main urban area of Wetherby with very limited access across the A1(M) which creates a significant access barrier to the existing settlement.									
3309	Scarcroft Cottage, Wetherby Road, Scarcroft, Leeds, LS14 3HJ	Not allocated as housing	13	0.5	0	0	0		
Sieved out - Not within the settlement hierarchy									
3317	railway sidings at scholes	Not allocated as housing	75	3.3	0	0	0		
Green Belt site. The site is a disused railway track and is therefore linear and extends out into the Green Belt, totally unrelated to the existing settlement form. Development would create a linear island site not considered acceptable development in the Green Belt. Highways concerns regarding access.									
3322	Winnow Lane	Not allocated as housing	384	14.6	0	0	0		
Green Belt site. The development of the site would be unacceptable in Green Belt terms as it would result in unrestricted sprawl and fail to protect the countryside from encroachment. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
3323	Land at Brandon Golf Course, Shadwell	Not allocated as housing	118	4.5	0	0	0		
Sieved out - Not within the settlement hierarchy									
3325	Land at Thorne Lane Leeds	Not allocated as housing	142	6.3	0	0	0		
Green Belt site. The site is set in an isolated position and does not relate to any of the nearby settlements. The site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and encroachment of the countryside									
3332	High Trees School, Boston Spa	Not allocated as housing	27	0.8	0	0	0		
Green Belt site. The site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment. The site is also protected as green space.									
3333	Land off Ling Lane, Scarcroft	Not allocated as housing	65	2.9	0	0	0		
Sieved out - Not within the settlement hierarchy									
3363	Mill Lane, Bardsey	Not allocated as housing	11	0.4	0	0	0		
Sieved out - Not within the settlement hierarchy									
3371	Sweep Farm, Wetherby	Not allocated as housing	861	32.8	0	0	0		

Green Belt site. The development of the site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment.									
3375	Boundary between Green Belt and Urban Development	Not allocated as housing	45	1.7	0	0	0		
Green Belt site. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
3429	Land off Black Moor Lane, Bardsey	Not allocated as housing	59	2.6	0	0	0		
Sieved out - Not within the settlement hierarchy									
3437	Parlington Estate, Aberford	Not allocated as housing	53	2.4	0	0	0		
Sieved out - Not within the settlement hierarchy									
3438	Aberford Road, Aberford	Not allocated as housing	31	1.2	0	0	0		
Sieved out - Not within the settlement hierarchy									
3448	Land off Trip Lane Linton	Not allocated as housing	92	4.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
3452	Land off Potterton Lane	Not allocated as housing	385	17.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
3453	Land off Potterton Lane	Not allocated as housing	46	1.7	0	0	0		
Sieved out - Not within the settlement hierarchy									
3461	Land off Tith Barn Lane, Bardsey	Not allocated as housing	31	1.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
3462	Land at Clifford Moor Road, Clifford	Not allocated as housing	0	0.4	0	0	0		
Sieved out - below 0.4ha									
4018	Shadwell Lane	Not allocated as housing	109	4.1	0	0	0		
Green Belt site. Development of the site would significantly reduce the Green Belt gap between Leeds conurbation and Shadwell and extend the linear form of the existing built up urban area. No Highways issues raised.									
4065	Piccolino's, south of A58, Collingham	Not allocated as housing	7	0.2	0	0	0		
Site is too small. Brownfield site situated within the urban area of Collingham. Acceptable for residential development in principle.									
4079	Site of Prison Social Club, Walton Road, Wetherby	Not allocated as housing	23	0.9	0	0	0		
Sieved out - Not within the settlement hierarchy									
4096	Nidd Vale Motors, Wetherby	Not allocated as housing	15	0.4	0	0	0		
Site is being pursued for alternative uses by the land owner, subject to planning permission.									
4151	Ferndale House Shadwell	Not allocated as housing	31	1.1	0	0	0		
Sieved out - Not within the settlement hierarchy									
4152	Aberford Road, Bramham	Not allocated as housing	12	0.4	0	0	0		

Existing green space site. Site to be retained for green space use and is not available for development.									
4154	Wike Ridge Lane, Alwoodly	Not allocated as housing	94	3.6	0	0	0	0	
Green Belt site adjacent to existing residential development on two sides. Local flooding/drainage concerns. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
4155	Land at Harewood Road, Collingham	Not allocated as housing	93	4.1	0	0	0	0	
Green Belt Site. The site is reliant on the development of an adjacent site to round off the settlement. Site is steeply sloping. Site is not required to meet the housing numbers due to local preference for an alternative strategic option.									
4162	Land to the rear of Woodland Gardens, Scarcroft	Not allocated as housing	38	1.4	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
4163	Woodland Gardens, Scarcroft	Not allocated as housing	12	0.5	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
4165	Hampson House, Bardsey	Not allocated as housing	11	0.4	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
4166	Land South of Shadwell Lane	Not allocated as housing	159	6.1	0	0	0	0	
Green Belt site. Unacceptable impact on the Green Belt in terms of sprawl and coalescence as it would significantly reduce the gap between main urban area of Leeds and Shadwell.									
4170	Whinmoor Lane, Shadwell	Not allocated as housing	0	1.5	0	0	0	0	
Green Belt site. The site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment. Do not want to promote new development directly outside the East Leeds Orbital Road; this principle is established all along its route.									
4201	Land at Rose Croft, East Keswick,	Not allocated as housing	33	1.2	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
4218	Thorp Arch & Boston Spa Cricket Ground	Not allocated as housing	39	1.1	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
4221	Barwick	Not allocated as housing	13	0.5	0	0	0	0	
Brownfield site, not within the Green Belt. Significant tree cover to the north section of the site. Access concerns.									
4229	Land behind Wyncroft Court, Barwick in Elmet	Not allocated as housing	61	2.7	0	0	0	0	
Green Belt site. The site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment.									
4234	Field & Well Opposite 4 Oaks Farm, Boston Spa	Not allocated as housing	29	0.8	0	0	0	0	
Site situated within conservation area. No suitable options to safely access the site									
5022	Land South Of Main Street, Shadwell LS17 8ES	Not allocated as housing	105	4	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
5134	Land at Wetherby Road/Walton Road Walton	Not allocated as housing	270	12	0	0	0	0	
Sieved out - Not within the settlement hierarchy									
5154	Land north of Bramham Road Thorne	Not allocated as housing	92	4.1	0	0	0	0	

Sieved out - Not within the settlement hierarchy										
5162	Land at Whinmoor Lane Redhall	Not allocated as housing	508	19.4	0	0	0	0		
Green Belt site. The development of the site would have an unacceptable impact on the Green Belt in terms of unrestricted sprawl and safeguarding the countryside from encroachment.										
5163	Land at Wike Ridge Lane Slaid Hill	Not allocated as housing	129	4.9	0	0	0	0		
Green Belt site. The development of the site would have an unacceptable impact on the Green Belt in terms of sprawl and safeguarding the countryside from encroachment.										
5168	Wood Farm south of Ling Lane Scarcroft	Not allocated as housing	778	34.6	0	0	0	0		
Sieved out - not within the settlement hierarchy										
CFSM033	NEB Site, Scarcroft Lodge, Scarcroft, Leeds	Not allocated for mixed use	0	4.8	0	0	0	0		
Not within the settlement hierarchy										
CFSM038	Land at Parkhouse Farm, Aberford, Leeds	Not allocated for mixed use	0	1.1	0	0	0	0		
Along with CFSM039, significant incursion into the Green Belt north of the motorway. Without site CFSM039, this site would be isolated.										
CFSM039	Land at Parlington, Aberford, Leeds	Not allocated for mixed use	0	28.4	0	0	0	0		
Unwarranted incursion into the greenbelt										
CFSM053	Land at Home Farm, Aberford	Not allocated for mixed use	0	2.2	0	0	0	0		
Sieved out - not within the settlement hierarchy										
HG1-29	Linton Road - Raintree Lodge, Wetherby	Identified housing (permitted)	4	0.5	11.5	1.24	12.74	43.64	1.21	0.16
ref 793 site already developed										
HG1-30	Wetherby Health Centre	Identified housing (permitted)	8	0.4	0	0	0	38.89		
SHLAA ref 3186 site already developed										
HG2-220	Moor End, Boston Spa	Identified housing (permitted)	9	0.6	0	0	0			
ref 103 site already developed										
HG2-223	Wike Ridge Road, Alwoodley									
3391 Headley Hall, Bramham										
Landowner has confirmed that the site is not available			3000	276	0	0	0			

Sites contributing to meeting needs

Sites with low flood risk – zone 1

These are sites that are identified and proposed for allocation. Of these sites, those that have low flood risk are listed in Table 2; this zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%). Table 2 allows the total quantity of development achievable in areas of low flood risk during the plan period (2012 – 2028) to be calculated.

It should be noted that sites that have less than 2% of their area in flood zone 2, flood zone 3 or a combination are included in Table 2. This is because in most cases such small areas of flood risk could be eliminated by a re-draft of the site boundary. Nevertheless, development of these sites must be subject to careful layout and design to avoid placing vulnerable development over the small areas of high flood risk and to ensure development on low flood risk areas of land does not exacerbate the risk of flooding on adjacent land.

Please note that Outer North East has two sites with high proportions of land in SFRA Zone 2, but where more recent EA data shows no areas of high flood risk. The EA data is relied upon because it is more up-to-date.

The majority of plan period sites within the Outer North East HMCA are within flood zone 1. In total these sites can deliver 3,077 dwellings of the 5,000 dwellings needed according to the Core Strategy. This provides the basis for the sequential test, to explore the whether development on land of higher flood risk may be justified for allocation as insufficient housing land is available in the HMCA on land of lower flood risk.

Table 2: Sites within flood zone 1.

Site Ref	Address	Status	Units	Ha	EA2	EA3	EA2+3	SFR 2	SFR 3ai	SFR 3aii	SFR 3b	RI
					Proportion of land within the flood zone							
3100832	Avenue D Thorp Arch T E	Identified employment (UDP)		4.3	0	0	0					
3103954	Park Hill Farm Park Hill Studio Walton Road Wetherby	Identified employment (permitted)		0.5	0	0	0					
3104210	Units 512 & 515 Thorp Arch Trading Estate Wetherby Ls23 7bj	Identified employment (permitted)		1.6	0	0	0					
3104450	Land at Rudgate Walton Wetherby	Identified employment (permitted)		0.7	0	0	0					
3203550	Holmecroft York Road Ls13 4	Identified employment (permitted)		2.3	0	0	0					
3103750	Wighill Lane & Rudgate, Thorp Arch Ind Estate	Identified employment (UDP)		0	0	0	0					
EMP00337	Avenue D & E Thorp Arch Estate	Identified employment (UDP)		0	0	0	0					
1046	Spofforth Hill, Wetherby LS22	Identified housing (permitted)	325	15.4	0	0	0					
777	Churchfields, Boston Spa	Identified housing (UDP)	170	8.6	0	0	0	5.15	1.51		1.5	
15	Wetherby Road - Scarcroft Lodge, Scarcroft	Housing allocation	130	5.8	0	0	0					
778	Bowcliffe Road - Bramham House, Bramham	Identified housing (UDP)	30	2.1	0	0	0					
4074	Forensic Science Lab, Sandbeck Lane, Wetherby	Identified housing (permitted)	57	2	0	0	0					
HG2-20	Mercure Hotel, Wetherby Road, Wetherby (extended to include Micklethwaite Farm)	Housing allocation	86	1.9	0	0	0					
757	Harewood Village Farm	Identified housing (UDP)	18	1.2	0	0	0					
1154 and 3132	Church Street (land to east of), Boston Spa LS23, merged with SHLAA site 3132	Housing allocation	36	1.7	0	0	0					
786	Aberford Road - Bramham Lodge	Identified housing (permitted)	11	1	0	0	0					
1041	Wetherby Road (land to east of Castle Mona Lodge), Scarcroft	Identified housing (permitted)	11	1	0	0	0					
4070	Black Horse Farm, South Approach, Aberford	Identified housing (UDP)	5	0.9	0	0	0					
3152	Spenn Common Lane, Bramham	Identified housing (permitted)	9	0.8	0	0	0					
785	Syke Lane/Moses Syke, Scarcroft	Identified housing (permitted)	11	0.7	0	0	0					
798	Station Road (37-51), Scholes	Identified housing (permitted)	1	0.7	0	0	0					
4068	Land to the East of Belle Vue Avenue, Scholes	Housing allocation	15	0.6	0	0	0					

HLA3100390	Land To Rear Of 20-30 Syke Lane, Scarcroft, Leeds	Identified housing (permitted)	9	0.6	0	0	0	0				
4150	Farfield House, Bramham	Housing allocation	14	0.5	0	0	0	0				
90	Church Lane (27) - St Vincents School, Boston Spa	Identified housing (permitted)	13	0.5	0	0	0	0				
787	Linton Springs, Sicklinghall Road, Linton	Identified housing (permitted)	16	0.5	0	0	0	0				
4076	Benfield Ford, Deighton Road, Wetherby	Identified housing (permitted)	56	0.5	0	0	0	0				
1153	Keswick Lane (land to north of), Bardsey - site of The Blessed Sacrament Church	Housing allocation	10	0.4	0	0	0	0				
71	Thorp Arch Grange, Walton Road, Thorp Arch	Identified housing (permitted)	14	0.4	0	0	0	0				
3353	Wetherby LS23 6HJ	Identified housing (permitted)	5	0.4	0	0	0	0				
3223	Elmhurst, Elmwood Lane, Barwick In Elmet	Identified housing (permitted)	1	0.3	0	0	0	0				
4072	White House Farm, Bunkers Hill, Aberford, LS25	Identified housing (permitted)	5	0.3	0	0	0	0				
5139	HALLFIELD LANE WETHERBY	Identified housing (permitted)	9	0.2	0	0	0	0				
HLA3104350	REAR OF 134-140 HIGH STREET, BOSTON SPA, WETHERBY, LS23 6BW	Identified housing (permitted)	6	0.2	0	0	0	0				
HLA3104250	201 HIGH STREET BOSTON SPA	Identified housing (permitted)	10	0.1	0	0	0	0				
HLA3104340	FORMER GEORGE & DRAGON, HIGH STREET, WETHERBY, LS22 6LT	Identified housing (permitted)	2	0.1	0	0	0	0	93.87			
HG2-227	Wealston Prison	Housing allocation	142	6.3	0	0	0	0				
MX2-39	Parlington	Housing allocation with mixed uses	1850	261.7	0	0	0	0				
			3077									

*Sites which fall in two or more HMCAs, only the capacity for the area within this HMCA have been added to the total.

The Sequential Test

In the Outer North East HMCA, 3077 dwellings can be achieved on sites within zone 1 flood risk, leaving 1,923 dwellings to be found from the 5,000 target.

Looking next at sites that contain small quantities of land that floods (a combination of EA Zone 2 and Zone 3), if the quantity is smaller than the standardised area assumed to be undevelopable for housing (ie the gross site area less the net developable area) but needed for roads, landscaping, greenspace etc, these are sequentially preferable than sites with meaningful amounts of Flood Zone 2 land. These sites have been individually checked to ensure that the location of and size of areas of flood would not preclude development of the assumed dwelling capacity. Outer North East has three such sites listed in Table 3 below, which provides a capacity of 1920 dwellings. Deducting these from the 1,923 dwellings means that 3 dwellings still need to be found.

Looking next at sites that have meaningful amounts of land in EA Zone 2 but not in Zone 3, this means at least 10% of the area of sites of 0.4 – 2ha in size and at least 25% of sites of more than 2ha. These are effectively Zone 2 sites. In Outer North East there are two sites as set out in Table 4 allowing 21 dwellings to be deducted. This means that the 5,000 target has been met.

Looking next at sites with a meaningful amount of land in SFRA Zone 3ai, but not in SFRA Zone 3aii, these are set out in Table 5 and provide for a total capacity of dwellings of 42.

Finally, looking at sites with a meaningful amount of land in SFRA Zone 3aii, there is one site with 5 dwellings in this zone.

The revised Publication Plan for the Outer North East HMCA can therefore meet the 5,000 target without having to allocate any sites with significant amounts of land in zone 3ai or zone 3aii. However, it is recognised that some sites already have planning permission and therefore are already counted in. Furthermore the number of dwellings is not excessively over the target and therefore it is prudent to include other sites as a contingency measure. The four sites with some land in zone 3ai and 3aii need to be assessed individually in terms of the Exception Test.

Surface water and other sources of flooding

The City Council keeps an up-to-date record of incidents of flooding that are non-fluvial, such as flash floods from high rainfall incidents and infrastructure breakdown. The SFRA 2007 includes a map of localised flood problems (Fig B – Local Flood Incident Overview). This information was utilised as part of the individual site assessments for all of the sites being proposed for allocation in the Site Allocations Plan and the Aire Valley Area Action Plan. Where proposed sites are known to have a history of local flood incidents, appropriate site requirements are given. The Natural Resources and Waste Local Plan has a suite of policies to ensure that development is appropriately laid out and designed to deal with flood risk.

Table 3: sites where combined EA2 & EA3 area of flood risk is less than the SHLAA net development threshold.

Site Ref	Address	Status	Units	Ha	EA2	EA3	EA2+3	SFR 2	SFR 3ai	SFR 3aii	SFR 3b	RI
					Proportion of site within flood zone							
5166	Land at Sandbeck Lane Wetherby	Housing allocation	165	6.3	2.04	7.56	9.6	9.25	7.22			
797	East Leeds Extension	Identified housing (UDP)	675	204.5	0.58	4.36	4.94	1.85	1.43			
HG2-226	Land to the east of Wetherby	Housing allocation	1080	47.6	2.05	10.06	12.11	12.11	10.06			
			1920									

Table 4: sites with a meaningful amount of land in EA Zone 2 flood risk, but not in EA Zone 3

Site Ref	Address	Status	Units	Ha	EA2	EA3	EA2+3	SFR 2	SFR 3ai	SFR 3aii	SFR 3b	RI
HLA3104180	THE BIGGIN GREAT NORTH ROAD BRAMHAM	Identified housing (permitted)	7	0.1	75.63	0	75.63	75.63				
1127	Woodacre Green and Bankfield (land to south), Bardsey	Identified housing (UDP)	14	1.2	42.27	3.61	45.88	45.89	3.61		1.39	
			21									

Table 5: sites with a meaningful amount of land in SFRA Zone 3ai, but not in SFRA Zone 3aii

Site Ref	Address	Status	Units	Ha	EA2	EA3	EA2+3	SFR 2	SFR 3ai	SFR 3aii	SFR 3b	RI
783	Bowcliffe Road Timber Yard, Bramham	Identified housing (permitted)	14	0.9	81.02	18.42	99.44	99.44	16.8		5.67	
5126	Keswick La, Bardsey	Identified housing (UDP)	10	0.3	1	11.93	12.93	12.89	11.93			
HG2-225 ref 5285	Land at the Rowans, Wetherby	Housing allocation	18	0.6	87.26	12.02	99.28	99.28	11.99			
			42									

Table 6: sites with a meaningful amount of land in SFRA Zone 3aii

Site Ref	Address	Status	Units	Ha	EA2	EA3	EA2+3	SFR 2	SFR 3ai	SFR 3aii	SFR 3b	RI
780	First Avenue, Bardsey	Identified housing (permitted)	5	0.6	4.33	79.32	83.65	79.32	79.32		72.82	

*Sites which fall in two or more HMCAs, only the capacity for the area within this HMCA has been included in the total

Exception Test

Four sites in Tables 5 and 6 need to be subject to the Exception Test in the Outer North East HMCA.

OUTER NORTH EAST HMCA EXCEPTION TESTS

Introduction

Para 102 of the NPPF requires that for those sites that have passed the Sequential Test and are proposed for a 'more vulnerable use', including residential, the sites must also pass the Exception Test.

For the Exception Test to be passed:

1. It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by the Leeds Strategic Flood Risk Assessment; and
2. A site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Results

There are 4 sites in the Outer North East HMCA which require the Exception Test to be applied. These sites are:

780 First Avenue, Bardsey
783 Bowcliffe Road Timber Yard, Bramham
5126 Keswick lane, Bardsey
5285 Land at the Rowans, Wetherby (HG2-225)

Exception Test for Site 780 First Avenue, Bardsey	
Flood Risk Zone: Mainly zone 3ai and small area of 3b	
Proposed uses subject of Exception Test: Housing (estimated 5 units)	
A: Does the development provide wider sustainability benefits to the community that outweigh flood risk?	
Yes	Explain how: The site already has a planning consent.
B: Has a FRA demonstrated that the development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reduce flood risk overall?	
A Flood Risk Assessment was submitted by the developer and this was accepted by the Environment Agency, subject to the inclusion of conditions.	
Conclusion	
This site has already been developed. A flood Risk Assessment was submitted by the developer and this included a number of measures to protect the site against flooding, as well as flood mitigation to ensure that the development did not increase flood risk elsewhere	

Exception Test for Site 783 Bowcliffe Road Timber Yard, Bramham**Flood Risk Zone: Zone 2, some zone 3ai and small area of 3b****Proposed uses subject of Exception Test: Housing (estimated 14 units)****A: Does the development provide wider sustainability benefits to the community that outweigh flood risk?**

Yes	Explain how: The site already has a planning consent. Sustainability appraisal site assessment: scores positively for re-use of brownfield land, walking distance to health facilities and accessibility to the highways network. Scores negatively for nature conservation effects and loss of agricultural land and for flood risk.
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B: Has a FRA demonstrated that the development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reduce flood risk overall?

A Flood Risk Assessment was submitted by the developer and this was accepted by the Environment Agency, subject to the inclusion of conditions.

Conclusion

A detailed FRA was submitted alongside the planning application demonstrating that the development will be safe and will not increase flood risk elsewhere. Site specific wording should note that the zone 3b functional floodplain part of the site must be kept open for flood storage.

Exception Test for Site 5126 Keswick lane, Bardsey**Flood Risk Zone: 3a(i) and 2****Proposed uses subject of Exception Test: Housing (estimated 10 units)****A: Does the development provide wider sustainability benefits to the community that outweigh flood risk?****No****Explain how:**

Sustainability appraisal site assessment: there are 5 double negative scores and only one minor positive.

B: Has a FRA demonstrated that the development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reduce flood risk overall?

- The SFRA Flood Map indicates that a small part of the site is located within Flood Zone 3A(i). The EA Flood Map indicates that the same part of the site is located within Flood Zone 3.
- Additional modelling of the beck and topographical survey of the site is required in order to make a more accurate assessment of flood risk at the site. [Note: if the land is raised in order to take it out of flood plain the developer will have to contribute to off-site flood improvements to mitigate the impacts]
- Any flooding is likely to be of short duration, (less than 2 hours), hence it is likely that people could remain inside buildings at first floor level, if they are unable to evacuate the site.
- Higher ground can be found at other locations within the site.
- The depth and velocity of flooding at the site during extreme events (> 1 in 100yrs return period) is unlikely to present a risk of structural damage to buildings.
- The measures described below, explain how the flood risk will be reduced in order to make the site safe for its users:
- Flood resilient construction should be utilised, where appropriate. For example, concrete ground floors should be used in preference to timber. Electrical sockets, fuse boxes, control equipment and wiring should be located at least 1.5 metres above floor level. Electrical cables should come down the wall to raised sockets rather than be located below ground level.
- Floor levels should be raised above the 100 year flood level, as per LCC's Minimum Development Control Standards.
- There is also a risk of flooding from other sources, such as sewers, water mains and surface water run-off. This needs to be considered during detail design. It is expected that flood risk from these sources will be reduced by setting finished floor levels above adjacent ground levels.
- In terms of drainage, the site is classed as a 'green-field'. Any future development would have to incorporate SuDS measures to mimic greenfield runoff.

Conclusion

The site did not score well in the sustainability appraisal and therefore it cannot be shown that there are sustainability reasons for allocating the site that outweigh the flood risk. Only a small part of the site is affected by flood risk, therefore it may be possible to avoid built development in that part of the site. It is therefore recommended that either the boundary of the site be amended to exclude the high flood risk area or that the site specific criteria for this site should specify that the high flood risk part of the site must be avoided for housing or other 'more vulnerable' use.

Exception Test for Site 5285 Land at the Rowans, Wetherby	
Flood Risk Zone: Zone 2, some zone 3ai	
Proposed uses subject of Exception Test: Housing (18 units)	
A: Does the development provide wider sustainability benefits to the community that outweigh flood risk?	
Yes	Explain how: The site already has a planning consent. Sustainability appraisal site assessment:
B: Has a FRA demonstrated that the development will be safe for its lifetime, without increasing flood risk elsewhere, and, where possible, reduce flood risk overall?	
A Flood Risk Assessment was submitted by the developer and this was accepted by the Environment Agency, subject to the inclusion of conditions.	
Conclusion	
A detailed FRA was submitted alongside the planning application demonstrating that the development will be safe and will not increase flood risk elsewhere.	

Conclusion

The first and last sites in the exception test schedule have been developed. The further two sites are required to have passed an Exception Test in the Outer North East HMCA. One of them already has a planning consent, the other, site 5126 at Keswick Lane, does not have any overriding sustainability reasons that outweigh the flood risk, however only a small part of the site is affected by flood risk. This site should only proceed to allocation if it can be shown that the site can be developed so that the built development avoids the high flood risk parts of the site.

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Site Allocations Plan
Revised Publication Draft: Area Proposals for Outer North East

**Flood Risk Sequential Test & Exception Test of
Proposed Site Allocations in the
Outer North East Addendum**

Leeds Local Development Framework
Development Plan Document

September 2016