



Site Allocations Plan

Leeds Local Development Framework

Development Plan Document

**Submission Draft Sustainability Appraisal – Non-Technical
Summary**

February 2017

1.0 Introduction

- 1.1 Leeds City Council is preparing the Leeds Site Allocations Plan which will identify land for housing, employment, retail and greenspace for the period to 2028. This will help to deliver the Core Strategy policies, ensuring that sufficient land is available in appropriate locations to meet the targets set out in the Core Strategy.
- 1.2 The first stage of the Site Allocations Plan was the Issues and Options which sets out initial ideas or options for the Site Allocations Plan and was subject to a period of public consultation from 3rd June to 29th July 2013. This was followed by the Publication Draft Plan which was published for consultation from the 22nd September to 16th November 2015. 9,644 submissions were made during the consultation resulting in 41,046 representations overall (ie individual specific issues raised).
- 1.3 Prior to the start of the Publication Draft consultation, the land owner of the new settlement proposal at site MX2-33 Headley Hall withdrew the site from the Site Allocation Plan process in September 2015. As a result of this withdrawal, it was necessary to reconsider the proposals for the Outer North East Housing Market Characteristic Area (HMCA) and to have a second Publication draft consultation limited to the Outer North East HMCA from the 26th September to 7th November 2016. 4,073 representations were received.
- 1.4 Subsequent to the Publication Draft Plan and the Outer North East HMCA Revised Publication Draft Plan the Council has prepared Pre-Submission Changes in response to the changes arising from the consultation responses and other changes resulting from further work undertaken or information presented since the Publication draft was prepared.
- 1.5 The plan is considered by the Council to have complied with the legal and procedural requirements and to be 'sound'.
- 1.6 This non-technical summary of the Sustainability Appraisal (SA) Report should be viewed alongside the full SA Report and Site Allocations Plan Pre submission.

What is Sustainability Appraisal?

- 1.7 The aim of Sustainability Appraisal (SA) is to promote sustainable development through better integration of economic, social and environmental considerations into the preparation and adoption of plans. SA is a means to identify and evaluate the impact of a development plan on economic, social and environmental objectives. It provides a systematic way of assessing and providing recommendations to improve plans as they are developed and identifying ways to mitigate against any negative effects of a plan.
- 1.8 It should be noted that SA cannot ensure that development will be absolutely 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 also have negative environmental impacts but they can be outweighed by positive social and economic aspects of the policy, which in balance allow it to be regarded as sustainable.

- 1.9 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

- 1.10 European legislation (the 'Strategic Environmental Assessment Directive' (SEA Directive)) 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.
- 1.11 The Planning and Compulsory Purchase Act 2004 (Section 19(5)) 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 (paragraph 165).

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 Site Allocations Plan (provided at Appendix 7 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 (Appendix 8 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 Site Allocations Plan. The SA Framework is explained in more detail in paragraph 2.7 below. A Scoping Report was then prepared and subject to consultation with the SA Consultees (Historic English, the Environment Agency and Natural England) and revised to reflect the comments received (Appendix 3 of the SA Report).
- 2.2 In addition to the formal consultation undertaken at the Scoping and Issues and Options stage, officers have been working with a number of consultees (internal and external to the Council) to establish an evidence base of comments and information on the individual sites subject to detailed assessment through the Site Allocations 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 Children’s Services. 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 scale of the Site Allocations Plan and number of sites assessed has been one of the greatest challenges in carrying out the Sustainability Assessment. Resourcing the individual site assessment work has been one of the main issues given the time constraints of 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 was updated for the Publication draft document and managing this process has also been reliant upon the combined resources of officers which has been challenging given other work priorities, particularly given the need to expand and update the content of the baseline to include evidence for each of the Housing Market Characteristic Areas. These updates were considered necessary to make the baseline information more ‘fit for purpose’ for the SA of the Site Allocations Plan. A number of small revisions were made to the baseline for the Pre-Submission changes stage including a revision of the maps showing all heritage assets, provide an updated flood risk zone map from the Environment Agency and to make a number of minor changes.

Key Sustainability Issues

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

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 greenspace
	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 greenspace.
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.

Option Selection

- 2.8 The role of the Site Allocations Plan is to identify sufficient land to deliver the spatial development strategy set out in the Core Strategy. The Core Strategy has been subject to a detailed Sustainability Appraisal (SA) and was found to be 'sound' by an independently appointed Planning Inspector and was adopted by the Council in November 2014.
- 2.9 The SA of the Core Strategy provides the backdrop to the preparation of the Site Allocations Plan and accompanying SA. The SA of the Site Allocations Plan should be considered within the framework established by the Core Strategy when considering development options.
- 2.10 Spatial Policy 1 of the Core Strategy identifies the location of development (including new housing, employment land and retail development). In relation to housing, Spatial Policy 6 identifies the housing land requirement and allocation of housing land, and Spatial Policy 7 gives the distribution across the 11 Housing Market Characteristic Area established by the Core Strategy. Policy H1 sets out the criteria for the location of sites for Gypsies & Travellers and Travelling Show People. Spatial Policy 9 identifies the requirement for new employment sites.
- 2.11 The preparation of the Site Allocations Plan and the options presented in the Issues and Options document were therefore guided by the development parameters set by these and other relevant Core Strategy Policies. The work undertaken in the preparation of the Publication Draft was to consider the alternative options presented in the Issues & Options document and from that identify the proposed sites for allocation, having regard to many considerations including distribution of sites, green belt, infrastructure and the SA assessment. Additional new sites were submitted during and subsequent to the Publication (2015) consultation and during the Revised Publication for the Outer North Housing Market Characteristic Area (2016). They have also been subject to the SA assessment process. Where considered potentially suitable, sites have been included in the Pre-Submission Changes stage.

Evaluation of Effects

- 2.12 Each site has been assessed against the 22 SA objectives. In order to achieve a consistency of approach a scoring framework was established, setting out a recommended score for sites reflecting how well the site performed against each SA objective. The scores range from a major positive effect (++), minor positive (+), neutral (O), minor negative (-) to major negative (--). Sites with an uncertain effect are scored ?. Not all SA objectives have a

full range of scores from ++ to --, this was dependant on the detailed information available to enable 5 different scores to be devised. The scoring criteria is detailed in paragraph 4.25-4.28 of the SA Report.

Identified Effects

- 2.13 The assessment of the proposed sites against the 22 SA objectives is provided in Appendix 10-12 of the SA Report. Appendix 10 lists the sites proposed for allocation and safeguarded land, Appendix 11 lists the sites not supported for allocation and Appendix 12 assesses the proposed policies.

Cumulative impact

- 2.14 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, cumulative and synergistic effects. Collectively this is called an assessment of the cumulative impact.
- 2.15 This process considers the effects of the SAP as a whole against the SA objectives. Appendix 1 of this document (Appendix 13 of the SA Report) 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 therefore focussed on the location of the allocations and their distribution across the Leeds district.

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 Report must include measures to prevent, reduce or offset significant adverse effects of implementing the Site Allocations Plan. 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 Site Allocations Plan or through subsequent planning applications for individual sites.
- 3.3 Appendix 14 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 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 Site Allocations Plan. The Core Strategy has established a monitoring framework which will also be used to assess the effects of the Site Allocations Plan. The monitoring framework is provided in Appendix 15 of the SA Report.

5.0 Habitats Regulations Assessment

- 5.1 In accordance with Article 6.3 of the Habitats Directive 92/43/EEC, screening assessments were carried out in relation to the Site Allocations Plan Publication Draft (2015) and the Site Allocations Plan Revised Publication Draft Proposals for Outer North East (2016) to determine whether Appropriate Assessment was required. It was determined in both instances that Appropriate Assessment was not required, a conclusion which was supported by Natural England. This was because it was considered that the physical proximity of the Site Allocations do not give rise to any potential Likely Significant Effects (LSEs), either alone or in combination, with other relevant Development Plan Documents (local plans). In addition, mitigation mechanisms have already been established in the Policy framework of the Site Allocations Plan and in adopted Development Plans, the Natural Resources and Waste Local Plan (2013) and the Core Strategy (2014).
- 5.2 Following the close of consultation on the Site Allocations Plan Publication Draft and the Revised Proposals for Outer North East and the review of representations received, the City Council is promoting a number of Pre-submission changes (PSCs) to the Plan. Individually and in combination, these changes do not amount to a fundamental change in the overall approach of the Plan but in a number of site specific instances seek to further mitigate the impact of the proposals. As a consequence, it is considered that the PSCs do not warrant an Appropriate Assessment, as these changes do not give rise to any LSEs alone or in combination. Natural England has been consulted on this conclusion and written confirmation was provided on the 24th January by Natural England that the PSCs do not alter the conclusions of the Habitat Regulations Assessment.

Appendix 1 Summary of Effects of the Site Allocations Plan

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
M	Medium	M	Medium term
L	Low	L	Long term
Permanence			
P	Permanent		
T	Temporary		

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 . New and retained allocations • The distribution of employment allocations aligns closely with the main urban area and regeneration areas, reflecting Core Strategy Policy SP1 with significant concentrations in the south and east of the district • The City Centre is the focus for office development (Policy SP3) providing an accessible location from within and beyond Leeds, including regeneration areas • There will be some loss of existing employment sites to housing use, creating a negative effect, however overall the SAP will have a significant positive effect in terms of SA1.

SA2 – Economic Conditions	R & L	P	S-L	H	++	<ul style="list-style-type: none"> • Employment allocations and mixed use allocations providing employment. New and retained allocations • City Centre focus for office and retail development. • Supporting investment in the City Centre and boundary changes to existing town centre uses identifying opportunities for new development • Reflecting Core Strategy objectives for the role of the City Centre and Town Centres (Policy SP1 & SP3) • Providing employment allocations in regeneration areas will encourage investment in those areas. • New housing allocations attracting investment by developers. New residents sourcing the job market, maintaining the economy and accessing services in the CC and TCs and other local services
SA3 – Education	L	P	S-L	M	+	<ul style="list-style-type: none"> • Allocation of land to accommodate new and extended schools to address increased demands for school places arising from new housing – phased to address housing needs • Beyond the scope of the SAP to increase participation in education and qualifications in disadvantaged communities and BME groups, however by supporting new development in the regeneration areas this may indirectly provide opportunities for increased participation, for example through new employment. Supported by Core Strategy Spatial Policy 8.
SA4 - Health	L	P	S-L	M	+	<ul style="list-style-type: none"> • Protection of existing greenspace and designation of new areas of greenspace to enable existing and new communities to have access to greenspace. Enabling recreation and healthy lifestyles. • Promoting accessible locations for new development. • Beyond the scope of the SAP to enable improved access to health facilities. It is the role of NHS England/CCGs/ and GP and dental surgeries to respond to increased demands for health care arising from new housing. These organisations

						have been consulted on the SAP process.
SA5 – Crime	L	P	S-L	M	?	<ul style="list-style-type: none"> Beyond the scope of the SAP to address rates of crime
SA6 – Culture, leisure & recreation	R & L	P	S-L	M	+	<ul style="list-style-type: none"> New housing in the City Centre and locations with access to existing facilities and attractions across the City will support participation New employment allocations directed to the City Centre and Town Centres will support and may increase patronage of existing facilities Retail policies protecting the City Centre and Town Centre boundaries will reinforce the role and attraction of centres In some circumstances, new housing allocations propose development on sites occupied by existing community facilities. However overall, the effect on SA6 is considered to be positive
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 Policy SP7 of the Core Strategy and the Leeds SHMA The delivery of the housing allocations will be expected to provide affordable housing reflecting Policy H5 of the Core Strategy The SAP will not address the number of empty and unfit homes, however other Council strategies address this including the Empty Homes Strategy The delivery of a mix of housing types will be expected to address the requirements of Core Strategy Policy H4 Sites are proposed for Gypsies and Travellers (Policy H7) Sites are identified as potentially suitable for elderly people (Policy H8) The delivery of the new housing allocations will be assessed against national housing standards for energy efficiency
SA8 – Social inclusion &	L	P	S-L	M	+	<ul style="list-style-type: none"> Employment and mixed use allocations will provide opportunities for investment and new employment,

participation						<p>particularly sites in the regeneration areas and the City Centre</p> <ul style="list-style-type: none"> • Sites located in accessible areas will enable access to existing services. Sites in less accessible areas will need appropriate mitigation to ensure improved accessibility • Protecting greenspace areas will provide opportunities for participation
SA9 – Community cohesion	L	P	M-L	H	0	<ul style="list-style-type: none"> • The number of new housing allocations potentially challenges the social cohesion of existing communities particularly in the outlying areas on the edge of the Main Urban Area and Major Settlements. Development of new sites in the Green Belt places new pressures on existing communities to accommodate the needs of new residents for example school places and health provision and the effect of increased traffic levels. Appropriate mitigation will be needed through design / landscape treatment, infrastructure, phasing • New housing and employment allocations would however 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 allocations where new facilities and infrastructure will be required.
SA10 – Greenspace	L	P	S-L	H	+ and --	<ul style="list-style-type: none"> • The SAP proposes the continued protection of existing UDP greenspace 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 across the city and access of communities to it (standards are set in Policy G3). However through the process of identifying new sites for housing allocation, in order to meet the Core Strategy housing requirements for a number of the

						<p>HMCAs existing greenspace sites are proposed for reallocation to housing use. This will impact on the overall availability of greenspace provision within the HMCA and local community with resultant effect on environmental and social objectives.</p> <ul style="list-style-type: none"> Deficiencies of greenspace 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. However through consideration of individual planning applications the type of new greenspace provided could be informed by the existing deficiencies within the local area.
SA11 – Greenfield and brownfield land	L	P	S-L	H	+	<ul style="list-style-type: none"> The SAP seeks to maximise the delivery of brownfield land. New housing requirements for the Leeds district established and agreed in the Adopted Core Strategy will unavoidably require new housing allocations comprising both brownfield and greenfield land.. Appropriate phasing will be used to ensure the release of brownfield sites early in the plan period whilst achieving a balanced supply of housing across the HMCAs. However given the housing requirement greenfield sites in regeneration areas in the more accessible locations will need to be come forward in the early phases. Greenfield sites in other areas will come forward in later phases. The majority of the proposed allocations for general employment are greenfield sites, but the majority of allocations for office use are brownfield. On, balance the overall effect on SA11 is considered to be neutral.
SA12 – Biodiversity and geological conservation	L	P	S-L	M	-	<ul style="list-style-type: none"> The majority of sites will have no significant ecological impact A number of the proposed allocations will

						<p>potentially affect sites with nature conservation value, including sites designated as Sites of Special Scientific Interest (SSSI), Sites of Ecological or Geological Importance (SEGI), Leeds Nature Areas (LNA) or habitats identified in the Leeds Biodiversity Action Plan or UK Biodiversity Action Plan Priority Habitats or within the Leeds Habitat Network.</p> <ul style="list-style-type: none"> It is important that appropriate measures are used to protect areas with biodiversity value through site specific requirements or Core Strategy policies.),), There are a number of sites where it is considered that mitigation would not be possible to address the effect upon biodiversity.
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 Core Strategy Policy SP10 which directs development to more sustainable locations within the settlement hierarchy, thereby directing growth to areas with public transport to the car and existing services. However some sites particularly in the more outlying areas are less accessible and appropriate mitigation will be sought to address this. Some of the larger sites with poor accessibility are of sufficient scale to offer opportunities to provide new infrastructure to address the existing accessibility limitations, eg land east of Garforth (HG2-124) and Parlington (MX2-39)
SA14 – Flood risk	R & L	P	S-L	H	-	<ul style="list-style-type: none"> Sites in highest flood risk zone sieved out (Zone 3B) SuDS are now required for all development since April 2015, which helps to manage flood risk. Natural Resources & Waste Local Plan (NRWLP) flood risk policies provide a way to manage flood risk on all sites. The flood risk sequential test shows that in some HMCAs it is not possible to meet the housing target

						without allocating some sites in flood zones 2 and 3a. The sites in Zone 2 and 3a will need to show that they have adequate mitigation for flood risk and do not make flood risk worse elsewhere. This is in accordance with the flood risk policies in the NRWLP. Where sites are allocated for housing in zone 3a an exceptions test is also required and this means that a detailed flood risk assessment must be available for each of those sites. In some cases FRAs will already have been prepared but on wholly new sites that have not previously been considered for development, a new FRA will have to be prepared.
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 within the settlement hierarchy, thereby directing growth to areas with public transport to the car and existing services. However some sites particularly in the more outlying areas are less accessible and appropriate mitigation will be needed to address this. Some of the larger sites with poor accessibility are of sufficient scale to offer opportunities to provide new infrastructure to address the existing accessibility limitations, eg land east of Garforth (HG2-124) and Parlington (MX2-39) • Given the scale of growth established through the Core Strategy there will inevitably be a cumulative impact on traffic levels across the Leeds district, which will have an impact on the capacity of existing roads. Appropriate mitigation will be required to minimise the effect on the road network
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 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 within the City Centre, town

						<p>centres and other locations. For less accessible locations mitigation will be needed to enable access.</p> <ul style="list-style-type: none"> • 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 housing mix (Policy H4) and affordable housing (Policy H5). The SAP proposes allocations for gypsies and travellers (supported by Core Strategy Policy H7) and identifies sites suitable for elderly accommodation (supported by Core Strategy Policy H8).
SA17 – Waste	L	P	S-L	M	0	<ul style="list-style-type: none"> • The NRWLP identifies sites for waste management. • A number of the proposed allocations lie within 100m of designated waste sites. Appropriate measures will need to be used to alleviate any potentially harmful effects.
SA18 – Pollution	L	P?	S-L	M	-	<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. • Effects on air quality/emissions particularly for sites in the less accessible locations may lead to increased car useage and therefore increased pollution. Appropriate mitigation is need through measures to improve accessibility • In relation to land instability the site allocations proposed in the plan promote development in Coal Authority DHRAs and close to MZIs. Developers are already required to undertake Coal Mining Risk Assessments for development in DHRAs in accordance with saved UDPR Policy GP5 and NRWLP Policy Minerals 3. Mitigation of coal mining legacy issues may increase site development costs although this will depend on the specific site

						<p>conditions. Where extraction of near surface coal is economically viable it could help to increase the viability of site development. An overall negative score is given because there may be a very small but inherent longer term risk where coal is left in the ground or with development around MZIs.</p> <ul style="list-style-type: none"> The effects on water quality will need to be mitigated, for example through Sustainable Urban Drainage Systems (Sustainable Urban Drainage in Leeds SPG), NRWLP Policy Water 7 drainage standards and the Minimal Development Control Standards for Flood Risk.
SA19 – Landscape	L	P	S-L	M	-	<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 and Core Strategy policies and the Neighbourhoods for Living SPG should be applied to assess the landscape value of the sites. A number of the proposed allocations lie within Special Landscape Areas, however this is small compared to the total number of sites proposed for allocation by the SAP. UDP and Core Strategy policies and the Neighbourhoods for Living SPG should be applied to assess the landscape value of the sites and value within the wider area.
SA20 - Local distinctiveness	L	P	S-L	M	0	<ul style="list-style-type: none"> The number of new housing allocations potentially challenge the objective of retaining local distinctiveness, particularly in the outlying areas on the edge of the Main Urban Area and Major Settlements. Development of new sites in the Green Belt needs to be treated sensitively with appropriate design and landscape requirements (UDP and Core Strategy policies and the Neighbourhoods for Living SPG). However the overall affect on SA20 is considered to be neutral given the number of allocations proposed across the Leeds district most of which would have limited or no negative effect on local distinctiveness .

SA21 – Historic environment	L	P	S-L	M	0	<ul style="list-style-type: none"> • A number of sites include or lie within close proximity to a heritage asset (Listed Building, Conservation Area, Scheduled Ancient Monument, Registered Park and Garden, Registered Battlefield). Sensitive locations include Bramham Park, Parlington, Temple Newsham and Roundhay Park • Appropriate mitigation will be needed to preserve the character of heritage assets through UDP and Core Strategy policies and planning conditions or agreements identified through the development management process • The SAP provides an opportunity to bring positive benefits to improve / cross subsidise the renovation of some heritage assets for example and Holbeck Urban Village (Temple Mills)
SA22 – Energy & natural resources	L	P	S-L	H	--	<ul style="list-style-type: none"> • Proposing new allocations places pressure on resource consumption (water and energy). Core Strategy policies however promote greater use of renewable energy/energy efficiency in design of new buildings. • NRWLP policies help us to manage resource use in the face of unprecedented demand for resources. • A large number of proposed allocations are brownfield sites; however there are a significant number of greenfield sites, including agricultural land. The release of greenfield sites will be managed through the phasing strategy. • 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.