



Site Allocations Plan

Leeds Local Plan

Development Plan Document

Post-Hearing Addendum 5 to Sustainability Appraisal

November 2018

Post-hearing Addendum to the Sustainability Appraisal

1. The Inspectors' Post Hearing Note

1.1. This Addendum has been prepared in response to the Inspectors' Post Hearing Note to the Council (**EX72c**) and responds specifically in relation to the issues raised in respect to the Sustainability Appraisal (SA). The Inspectors have raised two issues in relation to the Sustainability Appraisal, namely:

- The SA should incorporate an assessment of reasonable alternatives and reasons why sites are either preferred and allocated or rejected in order to meet the SEA requirements – this is currently lacking from the SA itself and should be incorporated;
- The SA should demonstrate why the release of the particular Green Belt sites that the Council puts forward instead of any UDP PAS sites is a preferred option to address housing provision up to year 11, setting out clear reasons in the SA.

2. A summary of the Council's approach

2.1. The Council considers that its approach to SA is sound and sufficient to support the preparation of the Site Allocations Plan and therefore complies with the requirements of the Strategic Environmental Assessment Directive (SEA Directive), transposed into the Environmental Assessment of Plans and Programmes Regulations 2004.

2.2. The matters raised by the Inspectors relate to Part 3 Regulation 12 (2) (b) of the 2004 Regulations, concerning the function of the SA to consider "...reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" and Schedule 2 (8)) to provide: "An outline of the reasons for selecting the alternatives dealt with..."

2.3. The SA documents produced as part of the preparation of the SAP have considered all reasonable alternatives, taking account of the scope of the Plan and geographical extent of the plan area. Appendix 2 of this document lists all SA documents. The Submission Draft SA, May 2017 (**CD1/17**) explains (section 2) the appraisal methodology for preparing the SA and the approach to identifying reasonable alternatives together with an outline of the reasons for selecting sites for allocation is set out in Section 4.

2.4. The Council's Self-Assessment of Soundness, March 2018 (**CD1/26**) summarises the approach taken as follows:

*For site allocations, the SA Report (**CD1/17**) clearly sets out in Appendices 10 and 11 the reasonable alternative sites identified. The sites assessed were derived from existing allocations from the UDP, sites submitted by landowners/developers and other areas of vacant/underused land that the Council identified, as explained in the relevant background papers (housing / employment). The sites were evaluated against the SA framework for sites as explained in Section 4 of the SA Report.*

*The reasonable alternative sites have been considered since the early stages of plan preparation. They were initially presented as distinct options by "colour coding" as set out in the Housing Background Paper (**CD1/34**). There are few alternative strategic options given the wider context set by the Core Strategy. However, an exception to*

*this is the range of alternative approaches in the Outer North East Housing Market Characteristic Area given submissions for a stand-alone strategic site (see Housing Background Paper **CD1/34** Section 5).*

*The SAP Policies are internally consistent, compatible and complementary, as evidenced by the Sustainability Appraisal Report (**CD1/17**) which demonstrates that against the sustainability appraisal objectives the cumulative impact of policies can be seen to be positive.*

- 2.5. Therefore, the submitted Plan contains an assessment of reasonable alternatives. Reasons why sites are either preferred and allocated or rejected are also contained within the evidence base at the Housing Background Paper (**CD1/34**) which also contains conclusions for individual sites on why they are released and for individual PAS sites that are rejected why this is the case.

3. Response to Inspectors Post Hearing Note

- 3.1. Notwithstanding that the Council considers that the SA undertaken, as an iterative process within the production of the SAP is a sound and legally compliant one, that has considered all reasonable alternatives for allocation at each stage of plan making, further work has been undertaken in response to the Inspectors note, to complement and supplement the work already done.
- 3.2. It is noted that the Council carried out further assessment work when it submitted a Revised Submission Draft Plan in March 2018 which included designation of broad locations. The Council, at this stage, also considered that the need to provide housing up to 2023 from land released from the Green Belt was an important factor in the suitability of proposed Green Belt allocations. Deliverability was a factor in this assessment. As a result of the discussions at the hearing sessions, summarised by the Inspectors in their post hearing note, relating to the soundness of broad locations, the plan approach is now proposed to be amended via Main Modification to delete all Green Belt sites which do not support planned delivery up to 2023. The effect of this modified plan approach, given the further assessment work carried out, is that the Council's revised Green Belt releases remain sound in the Council's view and are therefore unchanged with the former Broad Locations now proposed for deletion via Main Modification. Following the Inspector's post hearing note the Council has carried out further consideration of the SA to reinforce the assessment of outputs. This further consideration has revealed no different outcome as regards either the suitability of Green Belt releases or their consideration against alternatives.
- 3.3. The factor of deliverability has remained a key consideration to be considered alongside the Green Belt assessment, SA and site assessment. The conclusions for the larger Green Belt releases selected, when considered against the amended plan approach, confirm the need for local infrastructure provision including schools, which would not be present on smaller sites. This supports the evidential preference for the release of sites MX2-39 (land at Parlinton) and HG2-124 (Stourton Grange South, Garforth) which will provide dwellings in advance of 2023.
- 3.4. This clarification affords the opportunity for the SA to also fully reflect the post-hearing amendments to the plan approach, which only allows for release of Green Belt land where necessary to provide for housing needs up to 2023.

Methodology

- 3.5. For each site (all allocations for housing, employment and mixed use, safeguarded land designations, and sites rejected for housing, employment or mixed use) a summary of the specific SA carried out for that site has now been completed, to assist plan users. This summary facilitates comparison with both other sites and with the overall site assessment conclusion and (where a site is within Green Belt) the Green Belt assessment.
- 3.6. In the majority of cases, where the SA comprises largely negative scores, it can be seen that the site has not subsequently been allocated. In the majority of cases where the SA is largely positive, the site has subsequently been allocated.
- 3.7. In cases where the conclusions of the SA may not outwardly appear justified by the overall site assessment conclusion, a justification for this difference has been provided. To that end, where an SA is largely positive, but the site has not subsequently been allocated (mainly due to site assessment or Green Belt assessment conclusions), a justification is provided. Conversely, where an SA is largely negative, but the site has been allocated, a justification is provided.
- 3.8. This additional reporting of the SA conclusions is entirely consistent with the approach to site selection, which explains that the SA is not the conclusive factor in determining those sites suitable for allocation, but one of a number of considerations (paragraph 2.30 of the SAP **CD1/1**). The overall Site Assessment and/or Green Belt Assessment conclusions may outweigh the SA conclusions in certain circumstances. Furthermore, where the SA has negative scores against objectives, consideration is also given to whether these aspects can be mitigated against, to make the site deliverable. Only when mitigation is available (provided either through the existing Local Plan policies or specific site requirements) have the sites been preferred to alternatives.
- 3.9. An overview/conclusion for each HMCA is now provided to further explain the process of site selection, considering all the reasonable alternatives within the HMCA, including consideration of UDP PAS sites and the justification for retaining some of these as safeguarded land in preference to allocation, where applicable.

Identified Sites

- 3.10. Identified sites have not been subject to this further work as the majority of these sites already have planning permission. Remaining identified sites (expired sites and UDP allocations) have been subject of further work - see the SA Addendum – Identified Sites August 2018 (response to **EX52** Inspectors Actions). This concluded that for the majority of SA objectives, the identified sites have either neutral or positive effects. Where negative effects were identified mitigation measures are identified, as with allocated sites. Following the consultation on the SA Addendum of Identified sites (14th August to 11th September 2018), the Council reviewed the representations received and as a result, one identified site (HG1 – 68 Silk Mill Drive LS16, North HMCA) is proposed for deletion due to loss of woodland.

Protected Areas of Search

- 3.11. Where UDP PAS sites are not proposed for allocation in preference to other sites, the reasons are outlined in the HMCA summaries. This is consistent with the Core Strategy paragraph 4.8.6 which states that “Which land is identified by LDF Allocation Documents (and in particular the Site Allocations Plan) will depend on how well it meets the strategy for housing distribution, embodied by the criteria in Spatial Policy 6. Land not appropriate for housing might be needed for employment allocations or retained as future PAS in the LDF.” Paragraph 9.4 of the Green Belt Review Background Paper (**CD1/31**) also explains that all UDP PAS sites “were assessed against up to date guidance, legislation and the Adopted Core Strategy to determine their suitability for allocation” and “some Green Belt sites ‘scored ‘higher than existing PAS sites, for example, because they were considered to be in a more sustainable location. The conclusions from the assessment therefore mean that some existing green belt sites are being proposed for allocation whereas some existing PAS sites are not.
- 3.12. This is considered to be in line with national policy and carries out alterations to the Green Belt and designation of Safeguarded Land in the context of the preparation of a Local Plan.” Of a total of 37 UDP PAS sites, 14 are identified housing allocations (as they have received planning permission prior to 5th April 2018, 7 are proposed housing allocations, 2 are not allocated for housing nor safeguarded land (one has no notation, one is designated as green space) and 14 are proposed as safeguarded land. See paragraph 9.6 of **CD1/31** which lists all UDP PAS sites and their subsequent allocation or designation in the SAP, alongside the draft Main Modifications which propose that 5 PAS sites be identified housing sites. Therefore a total of 14 PAS sites (out of 37 initially proposed as PAS in the UDP) remain as safeguarded land on the basis that the assessment of reasonable alternatives concludes other sites (including Green Belt) to be more favourable.
- 3.13. UDP PAS sites which are safeguarded for future development by Policy HG3 are not considered to be sequentially preferably when compared to the reasonable alternatives within their HMCA, as detailed in the conclusions for the HMCA concerned.

Further SA Addendum

- 3.14. Appendix 1 reports on each Housing Market Characteristic Area as a table providing the SA summary of individual sites with the Green Belt assessment (where applicable) and overall site assessment conclusion and a justification provided (where relevant) where there is difference between the SA assessment and the site conclusion. This table helps elucidate the SA assessments for individual sites already submitted (2017 Submission SA (**CD1/17**) and 2018 Revised SA Addendum (**CDR1/5b**)). A commentary and conclusion for each HMCA is also provided to explain the conclusions for the overall selection of sites within that area, alongside specific HMCA spatial characteristics which have a bearing on SA objectives and their scoring e.g. access to rail network or potential for use of previously developed land. This includes an explanation of the approach to UDP PAS sites for each HMCA, where relevant.

Overall conclusions

- 3.15. This further assessment work has confirmed that for the majority of sites proposed for allocation the overall effects of individual sites on SA objectives are generally neutral or positive.
- 3.16. This assessment has been undertaken in the context of the Adopted Core Strategy and its strategic spatial approach. Sites within the more urban areas, in particular the City Centre and Inner HMCAs, are inherently more sustainable, justifying the higher housing numbers in these HMCAs. Conversely the outlying areas on the edge of the Main Urban Area, the major settlements and smaller settlements are generally less sustainable but nevertheless, in line with the distribution of housing throughout the District, needing to accommodate some housing allocations. In these HMCAs, particularly apparent in the Outer North East HMCA, the inherent characteristics of the areas concerned provide context to the SA outputs, especially as regards public transport accessibility. This is set out in HMCA summaries in Appendix 1.
- 3.17. From the assessment work undertaken, justifications have been provided for sites where further explanation is necessary in order to fully clarify the SA conclusions in comparison with the overall site assessment conclusions or Green Belt assessment. As explained above, as paragraph 2.30 of the SAP explains, the SA was one of a number of assessments undertaken to inform the selection of sites. Therefore in some instances the sites selected for allocation may be less sustainable when compared to reasonable alternatives within a HMCA, but there are other overriding factors for the allocation. These factors are clearly acknowledged (as noted in ¶3.7 above) and for these sites, mitigation measures have been identified.
- 3.18. The SA summaries refer to a number of mitigation measures which will be required to address negative SA effects. For example, ecology, heritage and landscape (sites subject to Tree Preservation Orders). Mitigation measures will be achieved through a combination of a) site specific requirements, and b) application of planning policy as identified in paragraphs 2.52 - 2.54 of the SAP (**CD1/1**). Paragraph 5.4 - 5.6 and Appendix 14 of the Submission Draft SA (**CD1/17**) lists mitigation measures for each SA objective which can be used to off-set negative impacts for individual site allocations.
- 3.19. To conclude, this SA Addendum comprises further detail for all sites, except for identified sites (dealt with in **EX52**) and is additional information supplementing the overall SA, including updates to the reporting of the assessment of all reasonable alternatives and reasons why sites are either preferred and allocated or rejected, in order to clarify the SA process, particularly in light of the plan approach to only release land from the Green Belt if it is necessary to meet housing needs up to 2023. This includes further justification why the release of particular Green Belt sites instead of any UDP PAS sites, (where applicable within the HMCA concerned) is a preferred option to address housing provision up to 2023.

APPENDIX 1:

HMCA summaries to be inserted at end of the SA tables for each HMCA.

The objectives of the SAP are set out at paragraph 1.6 (**CD1/1**) as proposed to be modified. They are to provide site allocations and requirements that 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 and achieve the Council's ambitions. It is acknowledged that there will be a need for a Site Allocations Plan review, to be adopted before 31st March 2023, where there will be a need to consider any additional Green Belt land that may need to be released to meet Core Strategy Selective Review housing requirements.

The most relevant objectives of the Core Strategy are set out in the spatial vision and spatial development strategy (SP policies) with Policies SP1: Location of Development; SP3: Role of Leeds City Centre; SP4: Regeneration Priority Programme Areas; SP6: The Housing Requirement and Allocations of Housing Land; SP7: Distribution of Housing Land; SP10: Green Belt and SP11: Transport Infrastructure Investment Priorities, being of particular importance in guiding the approach to site selection throughout the 11 individual housing market characteristic areas.

Aireborough

Consistent with the objectives of the SAP the approach in Aireborough has applied Policy SP1 of the Core Strategy to direct housing growth to the major settlement of Guiseley, Yeadon and Rawdon. The approach to selecting housing sites was further informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration.

Given the nature of the urban area within the HMCA, the opportunities for development of brownfield land are limited, although there are 5 housing allocations on brownfield or existing areas within the settlements limits. Therefore inevitably the SA reveals more negative scores relating to use of greenfield land, such as ecology and landscape. The remaining 8 housing allocations are on Green Belt land necessitated by the need to address the housing requirement up to 2023. In general the sites have neutral effects for the majority of SA objectives and any negative effects can be mitigated through site requirements and local plan policies, including ecology, built heritage, highways, and flooding. These allocations are the most sequentially preferable having regard to the combined conclusions of the assessment work undertaken compared to other reasonable alternatives within the HMCA.

For example, HG2-2 Wills Gill Guiseley is allocated in preference to 1255B Shaw Lane, Guiseley because whilst both sites score neutrally for the majority of SA objectives and both relate well to the settlement, it is concluded in the Green Belt assessment that the latter site does not have as defensible a Green Belt boundary and would create a greater protrusion into land to the north of the settlement than alternative sites.

The two UDP PAS sites are not carried forward as safeguarded land under Policy HG3. Haw Lane, Yeadon is subject to a Village Green designation and Canada Road, Rawdon is not proposed for development due to highway site access visibility constraints.

One employment allocation (EG2-24 Land at Carlton Moor, Leeds Bradford Airport) is proposed adjacent to Leeds Bradford Airport and was subject to the same assessments as the housing sites. It is considered to be an acceptable location for employment use having regard to the Green Belt characteristics of the site and proximity to the airport, evidence of

local need for a consolidated site for employment in this part of the city, subject to the mitigation measures identified as site requirements together with local plan policies. Alternatives for employment sites have largely been rejected on the basis of their lack of availability or suitability.

City Centre

Consistent with the objectives of the SAP and Policy SP1 and SP3 of the Core Strategy, housing and employment growth is directed to the main urban area and the City Centre. The Core Strategy identifies the second largest housing requirement for the City Centre HMCA (Policy SP7), as 10,200, reflecting the importance of the City Centre as a regional centre, its brownfield land capacity, and as a highly sustainable and accessible location for future housing and economic growth.

The majority of sites proposed for both housing and employment (and mixed use) allocation are sustainable and brownfield and their allocation is consistent with the settlement hierarchy approach. Alternative sites are largely rejected on the basis of their availability and suitability.

East

Consistent with the SAP objectives and Spatial Policy 1 of the Core Strategy, housing growth within the East HMCA is directed towards the Main Urban Area through both infill and expansion. The approach to selecting housing sites was informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration.

The SAP had regard to sites in the HMCA which are already identified and which contribute the majority of the housing target for the area. The identified housing site HG1-288 East Leeds Extension was carried forward from the UDP representing the largest site within the East HMCA, and delivering a third of the HMCA's total housing growth. The site will provide an urban extension to the Main Urban Area of Leeds, and will be accompanied by an orbital relief road (East Leeds Orbital Road – ELOR), as well as 3 new primary schools and local services, including health, shopping and recreation. Site mitigation will be provided through the existing UDP policy requirements and through the adopted East Leeds Extension Supplementary Planning Document.

Housing allocations within the East HMCA are provided on a mix of brownfield and greenfield sites. Of the 9 allocations for housing, 3 are Green Belt sites. These allocations are the most sequentially preferable having regard to the SAP objectives and combined conclusions of the assessment work undertaken compared to other reasonable alternatives within the HMCA. The non-Green Belt allocations have positive effects in SA terms as they are located within the main urban area and any negative effects can be mitigated through site requirements and local plan policies, including ecology, built heritage and highways. The Green Belt allocations form urban expansions to the main urban area and whilst these have some negative SA scores associated with their greenfield nature and relative distance from services, these can be mitigated. In comparison, further Green Belt alternatives in the HMCA scored poorly on all assessments (SA, Green Belt assessment and Site Assessment) which justified their rejection and contributed to the HMCA being significantly under its indicative housing target.

In addition, the provision of local services on sites such as HG1-288 and MX1-25 will improve the sustainability of adjacent allocated sites by delivering additional retail, leisure and education provision within accessible locations. There are no UDP PAS sites within this HMCA and no proposed safeguarded land designations.

One general employment allocation is proposed (EG2-27 Manston Road). The site performs well in SA terms. Being a cleared brownfield site, in an existing employment area, within the Main Urban Area and outside of the Green Belt, the site is considered sustainable against reasonable alternatives. One mixed use allocation including employment is proposed adjacent to Thorpe Park office and retail park (MX2-38 Barrowby Lane, Manston). It is considered to be an acceptable location for employment and housing uses having regard to the Green Belt characteristics of the site and proximity to the motorway and Thorpe Park retail and office park, subject to the mitigation measures identified as site requirements together with local plan policies.

Inner

Consistent with Policy SP1 and SP3 of the Core Strategy, housing and employment growth is directed to the Main Urban Area. The Core Strategy identifies the third largest housing requirement for the Inner HMCA (Policy SP7), as 10,000, reflecting the importance of the main urban area as a highly accessible and highly sustainable location for future housing and economic growth.

The majority of sites proposed for both housing and employment (and mixed use) allocation are sustainable and brownfield and their allocation is consistent with the settlement hierarchy approach. Allocations for housing in this area, characterised by overlapping with the city's designated regeneration areas, help stimulate wider regeneration and bring much needed investment to the areas. Alternative sites are largely rejected on the basis of their availability and suitability.

North

Consistent with Spatial Policy 1 of the Core Strategy, housing growth within the North HMCA is directed towards the Main Urban Area. The approach to selecting housing sites was informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration.

Of the 23 housing allocations (of which one is a mixed use site), 6 are within Green Belt. These allocations are mainly infill and provide the most sequentially preferable having regard to the combined conclusions of the assessment work undertaken compared to other reasonable alternatives within the HMCA. The sites have some positive effects in SA terms and negative effects can generally be mitigated through site requirements and local plan policies, including ecology, built heritage and highways. Whilst the area is mainly urban in character and with good access to the city centre via key guided bus routes and park and ride sites, it has relatively few previously developed land opportunities. Therefore Green Belt extensions are necessary and the SA reveals more negative scores relating to use of greenfield land such as ecology and landscape.

The area has an extensive Green Belt boundary and release of some sites e.g. HG2-43 Horsforth Campus is on the basis that whilst it scores neutral for the majority of SA effects and some negative effects given its greenfield nature it is well connected to the main urban and has relatively minimal Green Belt impacts. This compared to other options which are discounted, such as 4240 South of A65 from Horsforth & Rawdon RA or 2053A Alwoodley Lane, Alwoodley, sites with similar SA scores, but which would result in expansions to the main urban area, which relate less well to the main urban area.

There is one UDP PAS site which is part a proposed housing allocation in the SAP - site HG2-29 Moseley Wood Gardens, and part an identified site as it has received planning permission

– site HG1-58. There is one office employment allocation, which is the mixed use site MX2-4 Kirkstall District Centre, allocated partly for office, partly for residential as this is a brownfield site in a sustainable location within the centre of Kirkstall.

Outer North East

Consistent with the objectives of the SAP and the spatial strategy of the Core Strategy the approach in Outer North East has applied Policy SP1 and Policy SP10 of the Core Strategy, whereby housing growth is directed to the major settlement of Wetherby alongside exploring opportunities for a sustainable standalone settlement in the Green Belt. As the Housing Background Paper (**CD1/34**) explains, the Outer North East HMCA is characterised by a pattern of free standing settlements, mainly small villages, except for the Major Settlement of Wetherby to the north of the HMCA – this makes delivery of significant infrastructure benefits difficult.

Of the 8 housing allocations (which includes one mixed use site), 1 removes land from the Green Belt (MX2-39 Parlington Estate, Aberford for a mixed use new settlement proposal for 792 dwellings and 5ha of employment land) and one is proposed to remain within the Green Belt (HG2-26 Scarcroft Lodge Wetherby Road, Scarcroft).

There is a large urban extension to the major settlement of Wetherby in line Policy SP1 of the Core Strategy and having considered other infill opportunities (reflected as identified sites). This is UDP Rural Land; site HG2-226 Land to the east of Wetherby. This extension to the north east of Wetherby scores neutrally or negatively given its greenfield nature and its relative inaccessibility to wider services a situation shared with other sites in the HMCA. Nonetheless HG2-226 is preferable to alternatives extensions to Wetherby as these were rejected on the basis that they scored less favourably on other objectives such as flood risk and also on Green Belt impacts.

Given the nature of the urban areas within the HMCA, the opportunities for development of brownfield land is limited. Therefore the SA reveals more negative scores relating to use of greenfield land such as ecology and landscape. With the exception of HG2-26 Scarcroft Lodge the only major brownfield opportunity within the Outer North East lies at Thorpe Arch (1055a and b). However, the SA informs the site's lack of sustainability, further evidenced by the dismissed (July 2018) appeal for housing development on this site.

Whilst there is a defined major settlement and smaller settlements within the HMCA the lack of existing rail opportunities does limit the accessibility of settlements towards the outer edge of the ONE. To that end, the self-sufficiency of Wetherby and the employment opportunities within the town and at Thorp Arch Trading Estate move towards offsetting the relative isolation of the outer edges of the HMCA. Elsewhere in the HMCA links are possible to the major settlement of Garforth (with two train stations) and the main urban area (including programmed improvements to rail and a park and ride at Thorp Park).

There are 8 UDP PAS sites within the HMCA. Of these, 3 are identified housing sites (HG1-28 Spofforth Hill, HG1-519 Leeds Road, Collingham and HG1-520 Grove Road, Boston Spa, the latter 2 of which are proposed Main Modifications to the Plan, as they have received planning permission following appeal). The remaining 5 UDP PAS sites are designated as safeguarded land in the SAP under Policy HG3, and are not allocated for housing. This is because, Core Strategy Policy SP10 allows for the development of stand-alone settlements in exceptional circumstances. In this HMCA, proposed mixed use allocation MX2-39 Parlington is considered exceptional broadly by reason that; it is of a scale that will provide infrastructure, including education, retail, green space and employment provision, to deliver a sustainable settlement. The delivery of this infrastructure will off-set many of the negative SA

scores for this site. The site performs better in terms of its Green Belt and overall site assessment than Green Belt alternatives. This approach to site selection in the Outer North East HMCA is detailed in the Housing Background Paper **CD1/34**. In particular paragraph 6.25 explains why a new settlement at Parlington has been exceptionally considered compared to other reasonable alternatives, including the remaining UDP PAS sites, as being more appropriate in meeting the spatial objectives of the Core Strategy to deliver the housing required to this more remote and less sustainable area of Leeds district.

There is only one employment allocation in the HMCA – MX2-39 Parlington, the mixed use allocation for both housing and 5ha of employment land, which is an essential component for delivery of the sustainable stand-alone settlement.

Outer North West

Consistent with Policy SP1 of the Core Strategy, housing growth is directed to the major settlement of Otley and the smaller settlement of Bramhope. The approach to selecting housing sites was informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration. The selection of sites in Otley was particularly influenced by the flooding constraints of the Wharfe Valley together with the local topography of The Chevin and Green Belt function of land abutting the settlement.

The identified housing site MX1-26 East of Otley was carried forward from the UDP and provides the largest contribution towards housing supply in the HMCA. The site will provide an urban extension to Otley together with a relief road serving the site and local traffic within Otley and a new school.

Rejected alternatives in and around Otley were discounted on the basis of remoteness from the settlement, existing uses or flood risk.

The remaining sites in Otley are brownfield sites within the urban area including two mixed use allocations (MX2-1 and MX2-2, Ashfield Works and Westgate). Site requirements are provided for these sites including ecology, highway access and heritage supported by local plan policies.

The housing provision within the smaller settlement of Bramhope is provided by HG2-17 Breary Lane East, which was approved on appeal including the provision of land for a new school. A second site HG2-18 Church Lane, Adel has also had outline approval for housing including land for a new school. This site is located on the southern edge of the HMCA adjoining the Main Urban Area and relates more closely to the North HMCA at Adel. Both HG2-17 and HG2-18 are PAS sites in the UDP. Sustainability appraisal scores within this area reflect the lack of rail infrastructure to the major settlements, with reliance instead on bus routes to Leeds and Aireborough.

A safeguarded site (HG3-5) is proposed in the smaller settlement of Pool-in-Wharfedale. This site is PAS in the UDP and is proposed to be retained as safeguarded land. The site has neutral or negative effects in terms of SA objectives and is less sequentially preferable to other reasonable alternatives within the HMCA having regard to the objectives of the Plan (e.g. HG2-17 within the larger settlement of Bramhope). The village of Pool-in-Wharfedale is not a sustainable location and is notably less well served by public transport and local services compared to other locations in the HMCA including Otley, Bramhope and the Main Urban Area at Adel.

Sites for employment allocation are limited to two small sites in Otley (EG2-2 and EG2-3 Ilkley Road, Otley). Together with the identified employment allocation at East of Otley (MX1-26) these sites will provide for new employment development in the Outer North West HMCA supported by mitigation to address ecology and heritage. There are no other sequentially preferable sites within the HMCA compared to reasonable alternatives.

Outer South

Consistent with Policy SP1 of the Core Strategy and the SAP objectives, the greatest amount of housing growth and development in this HMCA is directed to the Major Settlement of Rothwell. A lower amount of development is directed to Mickletown and Methley, and Lofthouse and Robin Hood, which is commensurate with their role and function as Smaller Settlements. Additionally, a small allocation is proposed in the Village of Carlton, recognising the site specific benefits that would be associated with the allocation of this site. Out of a total of 10 housing allocations and recognising the lack of suitable brownfield land opportunities, 6 are Green Belt.

The allocations proposed in the major settlement of Rothwell (including Oulton and Woodlesford) make the most of the limited opportunities for infill development and the re-use of previously developed land (including site HG2-176 Windlesford Green Hostel), though Green Belt extensions to the town have been required comprising 5 sites. To support the residential development proposed, a new primary school is required to be provided as part of the development of site HG2-180 (Land between Fleet Lane and Methley Lane, Oulton), which is a Green Belt site. Overall, all of the proposed allocations score well in SA terms. Whilst the SA identifies some negatives for site HG2-180 in relation to a range of indicators which relate to accessibility, it is recognised that this is because of the distance between the site and the designated Town Centre of Rothwell, and does not take into account the existence of local shops and services in Oulton and Woodlesford which (despite not being within a designated local centre) will be accessible to future residents on this site. As a result, the site is considered to be suitable for allocation. This is compared to similar scale sites such as 1049_1058 Haighside Rothwell which was rejected because it has fewer positive SA scores and would represent a more significant incursion into the Green Belt given its location.

In Mickletown and Methley the SAP makes one Green Belt allocation (HG2-186 Main Street, Hunts Farm, Methley) which is a brownfield, part greenfield site, that scores reasonably through the SA and the potential negatives identified can be addressed through site requirements and local plan policies.

The SAP proposes to retain the existing UDP PAS site at Carlton as safeguarded land (HG3-26 Main Street/Pitfield Road, Carlton). The SA identifies that this site would have a negative effect on community cohesion and local distinctiveness, due to its size relative to the village. This concern is reflected by the wider site assessment, which also specifically notes that Carlton is defined as a 'Village' in accordance with Core Strategy Policy SP1, where development is expected to be limited. As a result, the site is considered to be less sequentially preferable for release compared to other reasonable alternatives within the HMCA. There is only one employment allocation (MX2-14 Aberford Road, Oulton) which is a brownfield site, within the settlement.

Outer South East

Consistent with Policy SP1 of the Core Strategy and the SAP objectives, the greatest amount of housing growth and development in this HMCA is directed to the Major Settlement of Garforth, which is served by 2 train stations. The town also has good links to the motorway network, being situated close to the A1(M) and M1 junctions. A lower amount of development

is directed to Allerton Bywater and Kippax, which is commensurate with their role and function as Smaller Settlements without rail infrastructure and to Micklefield, which whilst a smaller settlement benefits from a railway station.

The approach to selecting housing sites was informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration. There are 9 housing allocations, of which 3 are Green Belt sites within the HMCA.

The majority of development in Garforth is focussed on one large urban extension to the east of the town (site HG2-124 Stourton Grange Farm South, Garforth). This is as a result of the limited opportunities for infill development within the town itself, which is limited to a couple of small HG1 identified sites, and site HG2-235 (Stocks Blocks site). The site scores mainly neutrally in the SA given its edge of settlement location and greenfield nature. The site requirements of the SAP (alongside other existing policies of the Local Plan) help to mitigate potential adverse effects identified by the SA in relation to ecology, land stability and landscape. Moreover, a requirement for a new local centre as part of the development provides an opportunity for a new facility that would address the negative score noted against the health SA indicator. The proposal to direct the majority of development for the HMCA to a single site of such a scale will mean that development would have the critical mass needed to deliver the necessary infrastructure and services (both on and off-site), including education, wider green space benefits (in the form of a community park), a local centre and highway improvements as part of a comprehensive development proposal. The allocation of site HG2-124 is therefore in preference to allocating a larger number of smaller alternative Green Belt sites where critical infrastructure is less readily delivered and to alternative sites of a similar scale. Such sites for example, 1165 and 4258 Land at Barwick Road have significant constraints in the overall site assessment due to significant highway access issues. Other sites, including sites 3112, 5012, 1100 and 1044 Land northwest of Wakefield Road are not allocated due to the strategic importance of their role as part of the Green Belt gap between the Main Urban Area of Leeds and Garforth. Site 1232A Stourton Grange North is broadly comparable to HG2-124 and has similar SA scores but overall is not considered as preferable to the allocation. This is because it scores less well in relation to public transport accessibility, the proposed HS2 line will run through the north of the site, which creates potential uncertainty for delivery and highways access during the construction phase of HS2 and furthermore there was a local preference for a comprehensively developed site at HG2-124.

In Kippax the SAP proposes the allocation of two brownfield infill sites; HG2-129 (Ash Tree Primary School) and HG2-130 (Land at 25-29 High Street, Kippax) which both scored well overall through the SA and wider site assessments. In Allerton Bywater it supports the continued build out of the Millennium Village development (MX1-27), and allocates a small infill site that lies alongside it (HG2-135 Barnsdale Road) and a small Green Belt extension to the west of the settlement (HG2-133 Ninevah Lane) in accordance with the positive findings of the SA, site assessments and Green Belt assessment. Additionally, in Micklefield, the SAP carries forward a number of UDP allocations (HG1-305 South of Micklefield, HG1-306 Manor Farm Buildings and HG1-307 Church Lane and Manor Farm, Micklefield) on which proposals have been advanced and are at varied stages in the planning process. It also makes two new allocations, one of which is a former UDP PAS site (HG2-125 Pit Lane, Micklefield) and the other is a Green Belt site that lies between existing/proposed development and the railway station (HG2-126 Micklefield Railway Station car park). Whilst the SA does identify some negatives associated with the accessibility of the two sites in Micklefield, as the access to some services falls outside of the accessibility standards of the Core Strategy, on balance

they are considered suitable for development (particularly given their location next to the railway station which provides direct access into the Major Settlement of Garforth alongside other destinations).

The SAP proposes to retain two existing UDP PAS sites as safeguarded land – sites HG3-18 Selby Road, Garforth, and HG3-20 Park Lane/Doctor's Lane, Allerton Bywater. In the case of HG3-18, whilst the site scores reasonably through the SA (and a number of the potential negative effects identified by the appraisal could be mitigated through site requirements and local Plan policies) the SAP has consciously directed development towards a single large urban extension site. This is because a large urban extension will have the capacity and critical mass to deliver the necessary infrastructure on and off site as part of a comprehensive development. This is considered to represent the best planning outcome for the area, and offer comprehensive and cohesive planning benefits which would not be achieved through the allocation of a series of smaller sites. Conversely, site HG3-20 at Allerton Bywater would form a substantial extension to a Smaller Settlement. It scores relatively poorly through the SA, and a number of concerns about the site are identified through the site assessment process. Consequently, both sites are considered to be less sequentially preferable for release compared to other reasonable alternatives within the HMCA.

Outer South West

The allocations within the Outer South West HMCA are consistent with Policy SP1 of the Core Strategy, with the greatest amount of housing growth and development directed towards the Major Settlement of Morley and the Major Urban Area extensions around Middleton and Lower Wortley. The approach to selecting housing sites was informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration. There is also a considerable amount of housing allocated in the Smaller Settlements of Drighlington (close to the main settlement of Morley) and Gildersome, Tingley and East Ardsley (in effect contiguous but distinct urban extensions to Morley in their own right) and a limited amount of development in Thorpe on the Hill (a stand alone village). This approach is as a result of the specific spatial pattern of opportunities for infill and extension within the HMCA, a reflection of the importance of maintaining strategic Green Belt gaps close to the main urban area and affected also by the M62 running through the area.

Reflecting the urban nature of the area, the majority of sites within the HMCA are within the settlement boundaries. Of the 29 housing allocations, 8 are within the Green Belt. There are 2 Green Belt employment allocations. The removal of Green Belt land is necessitated by the need to address the housing requirement up to 2023. These allocations are the most sequentially preferable having regard to the combined conclusions of the assessment work undertaken compared to other reasonable alternatives within the HMCA. The sites have generally positive effects in SA terms (given their brownfield nature and accessibility helped by good rail and bus links) and negative effects can be mitigated through site requirements and local plan policies, including ecology, built heritage, highways, and land stability.

Two Green Belt housing allocations are adjacent to the Main Urban Area: HG2-136 Harpers Farm, Whitehall Road, Lower Wortley and HG2-159 Sissons Farm, Middleton. These are sequentially preferable to other Green Belt sites in terms of their relation to the settlement hierarchy and limited impact on the Green Belt. Moreover, alternatives such as 3060A Gelderd Road/M621, Gildersome which whilst having neutral or positive SA scores was discounted on the basis that its Green belt assessment concluded that it would have a detrimental impact on the gap between Morley and Gildersome.

Of the two Green Belt sites allocated in Morley, HG2-150 (Land to the east of Churwell will help to deliver education provision, and is sequentially preferable to other reasonable Green Belt alternatives (e.g. a cluster of rejected sites between Morley and Middleton, which would erode the strategic Green Belt gap at this location). HG2-153 (Albert Drive, Morley) is only partially Green Belt (40%) and is well related to the existing residential area so will have a limited negative impact on the Green Belt surrounding Morley.

The smaller settlements of Gildersome, East Ardsley and Drighlington all have several housing allocations. There are no Green Belt housing allocations in Drighlington and Gildersome and all sites that have been allocated are within the settlement boundaries. Drighlington has site HG2-143 King Street/Spring Gardens, which was a former UDP PAS site and is in close proximity to Drighlington local centre. Therefore it was considered sequentially preferable to other reasonable alternatives including Green Belt sites on the basis that rejected sites (e.g. 1332) scored poorly in terms of SA and highways access and would have greater impacts on the Green Belt.

There are several housing allocations in the area of Tingley, West Ardsley and East Ardsley. There are two Green Belt allocations, HG2-167 Old Thorpe Lane, Tingley and HG2-233 Moor Knoll Lane, East Ardsley. HG2-233 is a small brownfield allocation. HG2-167 would have a limited impact on the Green Belt as it is contained by roads on all sides of the site, and is well related to the existing built up area of Tingley. Due to the reasons outlined above, both sites have been assessed to be sequentially preferable to other reasonable alternatives, including Green Belt sites.

There are also 2 Green Belt housing allocations in the village of Thorpe on the Hill: HG2-165 Thorpe Hill Farm, Lingwell Gate Lane and HG2-166 Long Thorpe Lane which are within the South Leeds Regeneration area. HG2-165 is a brownfield site. These sites were allocated as they were the best sites available to meet local needs, had the least impact on the Green Belt objectives, had no sustainability appraisal issues that could not be mitigated against and were in line with key Core Strategy Spatial Policies.

Two sites in East Ardsley – HG2-168 and HG2-169 Haigh Wood remain sequentially preferable sites as they are not within the Green Belt and score relatively well in terms of SA.

2 UDP PAS sites are housing allocations HG2-149, Lane Side Farm, Morley and HG2-143 King Street/Spring Gardens, Drighlington. The UDP PAS site on Bradford Road, East Ardsley was granted permission on appeal and is identified housing site HG1-522 (in the schedule of Main Modifications to the SAP). There are 3 UDP PAS sites that are proposed as safeguarded land. HG3-23 (Tingley Station) has not been allocated due to the SA and site assessment concluding that it is a less sustainable location for housing. Moreover, the existence of employment allocations, such as the extension of Capitol Park, are assessed as being sequentially preferable whilst HG2-167 Old Thorpe Lane, Tingley scores well in terms of SA and is a well contained Green Belt release with the ability to use existing local services. The remaining 2 UDP PAS sites were not allocated as housing allocations as there were sequentially preferable sites within the HMCA, of a scale to deliver the housing requirement (HG3-22 Manor House Farm, Churwell, and HG3-25 New Lane, East Ardsley).

There are 6 employment allocations within the HMCA. The major strategic allocations are EG2-23 Nepshaw Lane, Asquith Avenue, Gildersome, and Green Belt site EG2-19 Off Topcliffe Lane/to the north of Capitol Park Morley. The majority of EG2-23 has a planning approval for employment use and EG2-19 is an extension of the existing employment site, Capitol Park. Although EG2-19 is a Green Belt site, it is more sequentially preferable to meet the district wide employment requirement than other potential employment sites as it would

result in a logical extension to the existing employment hub, Capitol Park. Both sites have no sustainability appraisal issues that could not be mitigated against and are in line with key Core Strategy Spatial Policies.

Outer West

Consistent with Policy SP1 of the Core Strategy, housing growth is directed to the Main Urban Area, which includes Pudsey, Farsley, Bramley, Stanningley, Armley, Farnley and Wortley. The approach to selecting housing sites was informed by the existing characteristics of the area, the requirements of Core Strategy Policy SP6, along with the findings of the Sustainability Appraisal, Site Assessment and Green Belt assessment (where applicable) of each site submitted for consideration.

As reflects the urban nature of the area with overlapping SP3 regeneration areas, out of a total of 26 housing allocations (including 1 mixed use allocation; MX2-5 Waterloo Lane, Bramley), there are only 7 Green Belt allocations. The majority of sites are within the settlement limits of the Main Urban Area and 12 of these sites are brownfield/part brownfield. The Green Belt allocations are necessitated by the need to address the housing requirement up to 2023. These Green Belt allocations are the most sequentially preferable, all being within the Leeds Bradford Regeneration Priority Area (Core Strategy Policy SP4) and having regard to the combined conclusions of the assessment work undertaken compared to other reasonable alternatives within the HMCA. The sites have reasonable effects in SA terms and negative effects can be mitigated through site requirements and local plan policies, including ecology, built heritage, highways, and flooding.

In general, the sites have mainly neutral effects in SA terms and negative effects can be mitigated through site requirements and local plan policies, including ecology, built heritage, highways, and flooding. For example, site HG2-69, Dick Lane, Thornbury scores neutrally for most SA objectives and the Green Belt assessment and overall site assessment support its allocation when compared to site 1060A-3377A Hough Side Road, Pudsey. The latter site is rejected on the basis that, whilst the SA is similarly mainly neutral and with good links to the settlement, the conclusion of the Green Belt assessment is that the Green belt impacts of the former site are minimal as the site is surrounded on three sides by development and with a railway line on its southern boundary, the latter site is only bounded by development to the north and would be a greater incursion.

Out of 3 UDP PAS sites, one is now identified site HG1-523 Low Moor Side, New Farnley (in the schedule of proposed Main Modifications to the SAP), and the remaining 2 are retained as safeguarded land designations, HG3-14 land at Rodley and HG3-15, Kirklees Knowl, Bagley Lane, Farsley. Neither of these are within the Leeds Bradford regeneration area which provides a focus for investment brought about by new housing opportunities in an accessible corridor. The regeneration benefits brought about in this area including through release of sustainable Green Belt sites are considered to be preferable than use of PAS land.

There are 4 employment allocations, all of which are within the main urban area, in sustainable locations.

APPENDIX 2: SUSTAINABILITY APPRAISAL DOCUMENTS

CD1/9	Sustainability Appraisal Scoping Report, May 2012
CD1/10	Sustainability Appraisal Issues and Options, June 2013
CD1/11	Sustainability Appraisal Issues and Options- Non-Technical Summary, June 2013
CD1/12	Publication Draft Plan - Sustainability Appraisal Report, Sept 2015
CD1/13	Publication Draft Plan - Sustainability Appraisal Report – Non-Technical Summary, Sept 2015
CD1/14	Revised Publication Draft Plan - Sustainability Appraisal Addendum: Outer North East HMCA, Sept 2016
CD1/15	Pre Submission Changes - Sustainability Appraisal Report, Feb 2017
CD1/16	Pre Submission Changes - Sustainability Appraisal Report – Non-Technical Summary, Feb 2017
CD1/17	Submission Draft Sustainability Appraisal Report, May 2017
CD1/18	Submission Draft Sustainability Appraisal Report – Non Technical Summary, May 2017
CDR1/5a	Revised Submission Draft SAP Amendments Sustainability Appraisal Addendum 1 Jan 2018 Consultation Draft Version
CDR1/5b	Revised Submission Draft SAP Amendments Sustainability Appraisal Addendum 2 March 2018 Submission Draft Version
EX44	Identified (HG1) Sites and Intended Further Work in relation to Sustainability Appraisal
No ref given as yet:	Council’s Response to EX52, Appendix 2: SA of Identified Sites
No ref given as yet:	SA Addendum: Council’s response to Inspectors’ Post Hearing Note 5 th October 2018 (this document)