

EASEL Area Action Plan

Sustainability Appraisal Report

SUMMARY REPORT

April 2007

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1 Introduction

- 1.1 This summary highlights the process and key findings of the Sustainability Appraisal (SA) of the East and South East Leeds (EASEL) Area Action Plan (AAP). The SA has been undertaken to assess the environmental, social and economic effects which are likely to arise from implementing the Preferred Options for the AAP. The SA also maximises the AAP's potential to support the delivery of social, economic and environmental objectives, with the SA providing a systematic way of checking and improving on the AAP as it develops.
- 1.2 The approach adopted in undertaking the SA is based on guidance set out in 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks', DCLG 2005 and the 'Guide to SA for the Leeds Local Development Framework', November 2005.
- 1.3 This SA was undertaken by a team with a background in planning and economic policy, transport policy, housing and sustainability issues. The initial appraisal of "Alternative Options" was carried out in May 2006. Appraisal of the "Preferred Options" was carried out in February/March 2007.

How to comment on the SA

- 1.4 Comments are invited on the EASEL AAP Preferred Options and on the SA. The detailed SA Report will accompany the EASEL AAP documents when it goes out for public consultation during a six week period in June/July 2007.

2 Background

Background to the EASEL Area Action Plan

- 2.1 Following changes to the planning system, brought about by the Planning and Compulsory Purchase Act (2004), the Unitary Development Plan (Review, 2006) for Leeds will gradually be replaced by the Leeds Local Development Framework (LDF). The LDF for Leeds will be made up of a number of land-use documents which will guide and control development. Area Action Plans are part of the LDF and are drawn up for areas where significant change is anticipated.
- 2.2 The vision of the EASEL AAP is *“to create sustainable mixed communities in which people will choose to live and work, now and in the future”*. The Area Action Plan for EASEL will show the location and type of land use change within the area over the next 15-20 years. The AAP will complement the EASEL Regeneration Initiative, a joint public-private venture to regenerate the area, by providing the statutory planning position to guide the implementation of proposals and to ensure that local people and other interested parties have the opportunity to help shape the plan before it is adopted. The AAP will ensure that sufficient land is available to carry out the regeneration initiative ensuring that appropriate land is available for new housing, greenspace, employment, schools, shops, health, sports and community facilities and will provide details on when and how proposals will be developed.
- 2.3 Preparation of the EASEL AAP has been progressing since 2005. In Summer 2006 the Council published three alternative futures for EASEL; this document “Alternative Options – Looking to the future” was subject to substantial public consultation. The City Council has refined those proposals and prepared the “Preferred Options – the future emerges” for the EASEL area, for public consultation in Summer 2007.

Purpose of the Sustainability Appraisal (SA)

- 2.4 The overall SA objective, of assessing the EASEL AAP, is to ensure that the AAP maximises its potential to support the delivery of social, economic and environmental objectives. The SA provides a systematic way for checking and improving on the AAP as it develops.

SA process

- 2.5 The following process has been followed when undertaking the SA of the AAP:
- Stage A Setting the context, objectives, baseline and scope
 - Stage B Developing and refining options and assessing effects
 - Stage C AAP Preferred Options assessment and mitigation
 - Stage D Reporting and consultation, and
 - Stage E Monitoring.

Stage A: Setting the context, objectives, baseline and scope

- 2.6 When setting the context, a review of relevant plans and programmes affecting or influencing the AAP was undertaken. Baseline data was also collected (where available) to help in characterising the area, identifying areas of opportunities and challenges and to help in the prediction of impacts. The baseline data is set out in a separate report. The SA objectives were taken from the already established SA

framework for Leeds City Council and it was against these objectives that the performance of the EASEL AAP Preferred Options was tested.

- 2.7 To ensure that the SA covered the relevant scope and detail, a Scoping Report was prepared in May 2006 and was issued to the statutory consultees for consultation. The Scoping Report outlined the SA objectives and the key sustainability issues for the SA to address. A number of alterations were made to the appraisal framework to take account of comments made by the four statutory consultees. This SA has been carried out using the revised appraisal framework.

Stage B Developing and Refining Options

- 2.8 The SEA Directive and the new Planning and Compulsory Purchase Act, 2004 place considerable emphasis on the consideration of reasonable alternatives. Consequently, a number of options or choices were developed for the EASEL AAP area. The alternative options were subjected to a Sustainability Appraisal and the detailed SA matrix tables and the commentary summarising the results of the SA were published on the Council's website. This enabled people to make an informed choice about the full effects of each of the alternative "options" when they were making their representations. The findings of the initial SA were used to help the City Council refine and develop the Options into Preferred Options.

Stage C AAP assessment and mitigation

- 2.9 The following key themes in the AAP were assessed against the SA framework:
1. Housing
 2. Mixed Use
 3. Priority Improvement Areas
 4. Retail & Local Services
 5. Education
 6. Greenspace & Recreation
 7. Transport & Movement
 8. Design & Sustainability
- 2.10 Predicted impacts of the eight themes of the EASEL AAP Preferred Options were evaluated and the results recorded using matrix tables. The matrix tables (set out in Section 4) use a series of notations to describe the likely effect of the AAP Options against the SA objectives.
- 2.11 The purpose of the SA assessment was to demonstrate that the likely sustainability effects of the AAP have been considered, taking both the objectives of the SA and the geographical scope of EASEL into account. The scoring enables consideration and recommendations of measures to prevent, reduce or offset any significant effects.
- 2.12 With the eight themes, where particular proposals were considered to justify individual assessment against the SA objectives, these have been highlighted within the matrix tables. This has helped to identify appropriate mitigation measures to minimize the risk of negative effects in the future.

Stage D Reporting and Consultation

- 2.13 This summary report has been produced to provide a summary of the key findings and to illustrate the process undertaken to complete the SA. A more detailed Sustainability Report will be published for comment with the Preferred Options. The consultation

period will be for six weeks. Following consultation, comments received will be used to determine whether any changes need to be made to the AAP.

Stage E Monitoring

- 2.14 The AAP, following implementation, will require regular monitoring to ensure that any significant effects are identified and, where necessary, remedied at the earliest opportunity. It is proposed that monitoring of the SA effects are linked to the Annual Monitoring Report (AMR), which forms part of the LDF. The Sustainability Report will set out a more detailed monitoring framework for the EASEL AAP.

Statement on the difference the process has made

- 2.15 The purpose of the SA is to ensure that social, environmental and economic considerations have been taken into account in developing the AAP Preferred Options. A review of the relevant plans and existing LCC programmes has assisted in informing the objectives of the AAP and the baseline compilation (contained in the Baseline Report) has helped to identify challenges and opportunities facing the EASEL area.
- 2.16 The SA process has also helped in making a comparison between having no AAP and the proposed AAP Preferred Options. This has highlighted where there are benefits in implementing a new AAP.
- 2.17 The SA has also helped identify areas where the AAP can be strengthened to ensure it delivers sustainable development. Where recommendations have been suggested, these are highlighted in the Matrix tables in Section 4.
- 2.18 The SA has also helped in identifying mitigation measures where relevant, it has also helped in highlighting areas where there are gaps in baseline data and areas where future monitoring is required.

Compliance with National, Regional and Local policy and programmes

- 2.19 The EASEL AAP sits within the wider context of the Local Development Framework (LDF) and the emerging Core Strategy, which will gradually replace the adopted Unitary Development Plan (Review, 2006) (UDP), as well as other national and regional guidance. Details of relevant plans and programmes are set out in the Baseline Report.
- 2.20 The EASEL AAP will replace the Gipton and Harehills Neighbourhood Renewal Areas (under Policy R1) and the Seacroft Regeneration Area (under Policy R2) within the Adopted Leeds UDP.

Compliance with the SEA Directive/Regulations

- 2.21 The Strategic Environmental Assessment (SEA) Directive for the assessment of the effects of certain plans and programmes was transposed into English law on the 20th July 2004 in the form of the Environmental Assessment of Plans and Programmes Regulations 2004. The objective of the SEA Directive is:

“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development”.

- 2.22 It has been determined that the EASEL AAP is required to meet the provisions of the SEA Directive. The SA encompasses the SEA of the Preferred Options AAP.

- 2.23 SA applies to all Development Plan Documents (including Area Action Plans) prepared as part of the LDF. The SA requires that the social and economic effects of the AAP are considered as well as environmental.

3 EASEL AAP Preferred Options – Summary of SA assessment

3.1 Predicted impacts of the eight themes of the EASEL AAP Preferred Options (1.11) were evaluated and the results recorded using matrix tables. The matrix tables use a series of notations to describe the likely effect of the AAP Preferred Options against the SA objectives. The notations used are:

- ++ Score awarded where objective is compatible and in line with the SA objective and is highly likely to have direct positive effects,
- + Score awarded where there is potential for positive effects either directly or Indirectly,
- O Score attributed to insignificant or neutral effect on the SA objective,
- Score awarded where objective is likely to have some negative impacts on SA objective either directly or indirectly,
- Score awarded where objective is incompatible with the SA objective and is highly likely to have adverse effects,
- D Impact dependent on how objective is implemented, could be positive or negative,
- ? Uncertain effect on SA objective.

3.2 In carrying out the assessment consideration was made of the impacts relating to short, medium and long term effects. In this assessment short, medium and long term were defined as:

- o short 0-5 years (2006-2011)
- o medium 5-10 years (2012-2016)
- o long 10 years onwards (2017 +)

Main options considered and how they were identified

3.3 The SA considered the strategic options, as set out by the eight themes (para 1.11) of the EASEL AAP Preferred Option. It was considered adequate to undertake a comparison of the sustainability impacts of not having an AAP, the 'No AAP Option', and having an AAP, the 'Preferred Option'.

No AAP Option

3.4 Under this option LCC would not produce the EASEL AAP. Instead, the Council would continue to depend on the adopted UDP Review policies that set out the general principles for development and use of land.

Preferred Option

3.5 The AAP Preferred Option identifies areas for development and provides details on when and how proposals will be developed. The EASEL AAP will show the location and type of land use change within the area over the next 15-20 years to ensure that sufficient land is available to carry out the regeneration initiative.

Comparison of social, environmental and economic effects

- 3.6 The Preferred Options were assessed against the SA objectives and their social, environmental and economic effects compared. The predicted impacts were evaluated and the results recorded using the matrix shown in Table 3.2.

General assessment of “No AAP” Option

- 3.7 Overall, when assessed against the economic SA objectives, the “no AAP” option is considered to have a negative effect on the economic potential of the EASEL area. The baseline information shows that the area has comparatively high levels of unemployment and economic inactivity, poor skills levels and low levels of household incomes. The “no AAP” option maintains current UDP allocations and therefore provides limited opportunities for further improvement. In addition, if the rest of the city continues to see an increase in economic growth and investment of businesses attracted to the City Centre and other key employment locations, and if no improvements are made to public transport accessibility (both within the EASEL area and linkages to surrounding areas) there is likely to be a negative trend over the longer term in local people not being able to access good quality jobs.
- 3.8 With the exceptions of ‘maintaining areas of greenspace’ and ‘improving the quality and disparity in the housing market’, the “no AAP” option is considered to have an insignificant impact on the social SA objectives, with potentially negative impacts on ‘engendering good health’. The “no AAP” option is likely to provide only marginal, indirect benefits across the EASEL area as the existing UDP does not provide new allocations for new facilities and therefore existing gaps in provision are not being filled.
- 3.9 Against the SA environmental objectives, overall, the “no AAP” option is considered to have a generally insignificant impact. There is the potential for some marginal positive benefits associated with developing existing UDP allocations and commitments. In the long term without further investment there is likely to be a decline in the quality of the environment.

General Assessment of “AAP Preferred Options”

- 3.10 When assessed against SA economic objectives, the “preferred options”, overall, are considered to have an insignificant affect in the short term. This is based on the assumption that the planning, implementation and release of large scale development sites to the market, together with sporting infrastructure is likely to take some time and more development is therefore likely to occur in the medium to long term. The “preferred options” do not propose specific employment allocations, however, the opportunity within the proposed mixed uses sites is considered to have positive effects on local economic growth in the medium to longer term depending on the proportion and type of employment uses brought forward and the number of jobs that are created for local people. In addition, housing market improvements, in terms of the quality of houses and disparity in provision, along with social and environmental improvements are likely to support investor confidence and attract new working populations. Furthermore, the access improvements to neighbouring employment opportunities in the City Centre, Aire Valley and Thorpe Park are considered the greatest positive impact on the economic SA objectives.
- 3.11 The “preferred options”, overall, are considered to have an insignificant impact in the short term on the social SA objectives. Again, similar to the economic objectives, this is based on the assumption that the planning, implementation and release of large scale development sites to the market, together with sporting infrastructure is likely to take

some time and more development is therefore likely to occur in the medium to long term. In addition, the impact of demolitions will result in people moving into and out of the area. In the short term this is likely to have negative impacts, particularly in regard to objectives SA8 and SA9 (social inclusion and cohesion). In the medium to long term the opportunities for development of new neighbourhoods and accessibility to new and enhanced leisure and recreational facilities is considered to have a positive affect on the social SA objectives. This depends on the type of development proposed and how proposals are implemented. The AAP will also provide indirect opportunities for increasing education participation and engendering good health.

- 3.12 Against the SA environmental objectives, overall, the “preferred options” promote positive improvements/enhancements in landscape, better accessibility, creation of biodiversity and the promotion of sustainable design. Within the proposals for new housing, there are greater opportunities for the creation of new higher quality greenspaces in the medium to longer term. In general terms however, there is uncertainty against many of the SA environmental objectives due to the number of variables that need to be considered in regard to the AAP overall, such as design, implementation and mitigation measures. For example, the proposals could increase growth in waste and impact on air pollution, but these variables can potentially be mitigated against to enable positive enhancements to be made overall.
- 3.13 When assessing the “Preferred options”, it was assumed that both land use and design implications were being considered and that indirect benefits relating to the Regeneration Initiative in regard to improvements to social housing stock, access to jobs and training etc would complement the “Preferred Options”. Whilst many of the SA objectives refer to impacts at city level, only the geographical area of EASEL was taken into consideration.
- 3.14 In regard to design and implementation the assumption was made that the City Council makes clear its commitment to the principles of sustainability within existing guidance and that this commitment to sustainability will ensure that broader sustainability benefits will come forward. Much emphasis is placed on the EASEL AAP proposals being guided by clear design principles. Design guidance will need to ensure that implementation is in accordance with broader planning guidance and the government’s sustainability agenda.

Table 3.2 Assessment of “no AAP” and “Preferred Options” – summary of scores only

SA Objectives		No AAP			AAP Preferred Options																							
					Housing			Mixed use			Priority Improvement Areas			Retail & Local			Education			Greenspace & Recreation			Transport & Movement					
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
SA1	Maintain or improve good quality employment opportunities and reduce the disparities in the Leeds labour market.	O	-	-	O	O	+	O	+	+	O	O	O	O	O	+	O	O	O	O	O	O	O	O	O	O	+	++
SA2	Maintain or improve the conditions which have enabled business success, economic growth and investment.	O	-	-	O	O	+	O	O	+	O	O	O	O	+	+	O	O	O	O	O	O	O	O	O	O	+	+
SA3	Increase participation in education and life-long learning and reduce the disparity in participation and qualifications achieved across Leeds.	O	O	O	O	O	O	O	O	+?	O	O	O	O	O	O	O	+	+	O	O	O	O	O	O	O	+	+
SA4	Improve conditions and services that engender good health and reduce disparities in health across Leeds.	O	-	-	O	+	+	O	O	+	O	+	+	O	+	+	O	O	O	O	+	++	O	+	+	O	+	+
SA5	Reduce overall rates of crime, and reduce the disparities in crime rates across Leeds.	O	O	O	D	D	D	D	D	D	O	+?	+?	O	O	O	O	O	O	O	+?	+	O	O	O	O	O	O
SA6	Maintain and improve culture, leisure and recreational activities that are available to	O	+	O	O	+	++	O	O	+	O	+?	+?	O	D	D	O	O	O	+	+	++	O	+	+	O	+	+

SA Objectives		No AAP			AAP Preferred Options																							
					Housing			Mixed use			Priority Improvement Areas			Retail & Local			Education			Greenspace & Recreation			Transport & Movement					
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
	all.																											
SA7	Improve the overall quality of housing and reduce the disparity in housing markets across Leeds	O	+	O	+?	+	++	O	O	+	O	+	+	O	O	O	O	+?	+	+	+	+	O	O	+			
SA8	Increase social inclusion and active community participation	O	O	O	-	D?	D+	O	O	O	+	+	O	O	+?	+?	O	+	+	+	+	+	O	O	O			
SA9	Increase community cohesion	O	O	O	-	D?	D+	O	O	O	-	+	+	O	D	D	O	+	+	+	+	+	O	O	O			
SA10	Increase the quantity, quality and accessibility of greenspace	+	+	+	+	+	++	O	+	+	O	+	+	O	O	O	O	O?	O	+	+	++	+	+	+			
SA11	Minimise the pressure on greenfield land by efficient land use patterns that make good use of derelict and previously used sites & promote balanced development.	O	O	O	++	++	+	+	+	+	+	+	+	+	+	++	O	+	+	+	+	+	+	+	+			
SA12	Maintain and enhance, restore or add to biodiversity or geological conservation needs.	O	O	O	-	O	+	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O			
SA13	Reduce greenhouse gas emissions.	-	-	-	O	O	+	?	?	?	?	?	?	O	+?	+?	O	O	+?	O	O	O	+	+	++			
SA14	Improve Leeds' ability to manage extreme weather conditions including flood risk	O	O	O	O	O?	O?	-	-	--	O	O	O	O	O	O	O	O	O	O	+?	+?	O	O	+			

SA Objectives		No AAP			AAP Preferred Options																							
					Housing			Mixed use			Priority Improvement Areas			Retail & Local			Education			Greenspace & Recreation			Transport & Movement					
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			
	and climate change.																											
SA15	Provide a transport network which maximises access, whilst minimising detrimental impacts.	O	O	O	O	O	O	O	O	O	O	O	O	O	O?	+	O	+	+	+	+	++	+	+	++			
SA16	Increase the proportion of local needs that are met locally.	O	O	O	O	+	+	O	+	+	O	O	O	O	+	++	O	+	+	O	+	++	+	+	+			
SA17	Reduce the growth in waste generated and land filled.	O	O	O	-	D	D	-	D	D	O	O	O	O	D	D	O	O	O	O	O	O	O	O	O			
SA18	Reduce pollution levels																											
	Contaminated land	O	O	O	+?	+	++	+	+	+	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O			
	Air Pollution	O	O	O				O	+	+				O	+?	+?	O	O	?	O	O	O?	O?	+	+			
	Water Pollution	O	O	O	O	+?	+	O	O	+	O	O	O	O	O	O	O	O	O	O	O	+	O	O	O			
	Noise Pollution	O	O	O							O	O	O	O	+?	+?	O	O	O	O	O	O	O	+	+			
	Light Pollution	O	O	O	O	O	O	O	O	O			+	O	+?	+?	O	O	O	O	O	O	O	O	O?			
SA19	Maintain and enhance landscape quality.	O	O	O	O	+	+	+	+	+	O	O	O	O	O	O	O	+	+	+	+	++	?	?	O			
SA20	Maintain and enhance the quality and distinctiveness of the built environment.	O	O	O	+	++	++	+	+	++	+	++	++	O	+	+	+	+	+	+	+	+	O	O	?			
SA21	Preserve and enhance the historic environment.	O	O	O	O	O	O	O	O	O	+	+	++	O	O	O	O	O	O	O	O	O	+	+	O			

SA Objectives		No AAP			AAP Preferred Options																				
					Housing			Mixed use			Priority Improvement Areas			Retail & Local			Education			Greenspace & Recreation			Transport & Movement		
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L
SA22	Make efficient use of energy and natural resources and promote sustainable design.	O	O	O	+	+	++	O	+	++	+	+	+	O	O?	O?	O?	O?	+	+	+	+	+	+	++

4 Proposed Recommendations, Risks and Uncertainties

- 4.1 The scores contained in Table 3 illustrate a number of potential negatives, uncertainties and potential impacts that depend on how proposals are implemented. These need to be addressed in the EASEL AAP to ensure that policies and or appropriate mitigation measures are put in place. The SA report provides more detailed commentary on this, as well as highlighting any gaps in the Baseline Report and/or EASEL AAP, where further details or analysis is required to enable monitoring of the SA objectives.
- 4.2 The table below highlights some of the key recommendations put forward by the SA assessment of the “Preferred Options”:

Table 4 Recommendations

SA Objective	Proposed Recommendation for AAP
General	Implications of the AAP Preferred Options should be considered in regard to the adjoining ‘City Centre Area Action Plan’ and ‘Aire Valley Area Action Plan’ as well as to wider district-wide strategies and policies for the Leeds District, including the emerging Core Strategy (and where appropriate, regional and national guidance and polices) to ensure that any sustainability issues arising from the geographical scope of EASEL are taken into consideration.
SA1 Quality employment opportunities	<ol style="list-style-type: none"> 1. The AAP needs to be more precise on what it aims to achieve in terms of proportion of uses within the Mixed Use sites. 2. A retail assessment is required to assess viability and capacity of proposed new retail/local centres
SA6 Culture, leisure and recreational activities	The AAP text needs to consider built leisure opportunities
SA7 Quality of housing	The AAP needs to be more precise on what it is providing in terms of mix, tenure, and type of housing e.g. provision for elderly, affordable homes, key workers accommodation etc
SA10 Greenspace	<ol style="list-style-type: none"> 1. A PPG17 greenspaces assessment is required to assess existing quantity and quality of greenspace. 2. AAP should specify where loss of greenspace/development of greenfield land is proposed as well as the proportion of brownfield development
SA11 Efficient land use patterns	The AAP needs to provide details of how the sites are to be phased and how they sit with the city’s overall housing land supply.
SA14 Flood risk & climate change	<ol style="list-style-type: none"> 1. The AAP needs to have a wider drainage strategy. 2. The AAP needs to have consideration of the wider implications relating to climate change and broader strategies to tackle resulting issues.
SA15 Transport network	The scale of the proposed extension to Seacroft District centre needs to be defined in the AAP and text is required to establish limits on what is appropriate development in the centre. (links to SA1 and need for retail assessment)
SA17 Waste	The AAP needs to consider the increase in waste and the potential mitigation measures that should be put in place.
SA18 Air pollution	This requires further information, analysis and monitoring.
SA22 sustainable design	The AAP should be aiming to achieve “excellent” sustainable design standards and should follow the Governments code for sustainable homes. This commitment is declared within the Council’s Corporate Procurement Strategy 2005 -2008, which contains details of the Council’s commitment to ensuring that all its procurement activities consider sustainable and environmental aims.

Uncertainties and risks

- 4.3 Uncertainties and risks exist in the process of preparing the SA, which are presented below.
- 4.4 The EASEL AAP Preferred Options is a strategic land use framework which will complement the implementation of the EASEL Regeneration Initiative. Whilst the AAP can allocate land it can not guarantee that individual sites are developed, this then effects the ability to fund individual projects and reduces the comprehensive nature of the proposals. The EASEL Regeneration Initiative reduces a substantial part of the risk of non development of sites and the loss of their ensuing benefits by committing sufficient funds to achieve the core objectives of the Regeneration Plan by formally agreeing a programme of development for a minimum of 120ha of land within the EASEL area. The potential for complementary funding to be secured from a range of developer contributions is more likely to be secured if there is a clear long term strategy for the regeneration of the area.
- 4.5 As already stated above, the EASEL AAP Preferred Options can not guarantee that individual sites are developed and therefore the amount of housing, employment and greenspace and supporting infrastructure can not be prescriptive and therefore there is uncertainty about the actual scale of what will be achieved. This means that monitoring is especially important for the EASEL AAP
- 4.6 The EASEL AAP proposals involve considerable demolition and the resulting issues relating to clearance and relocation could affect the time taken to decant residents to enable development to progress i.e. the potential for Compulsory Purchase Order (CPO) delays and possible CPO failure. In this regard, the Preferred Options rely on community “buy-in” to the proposals, so it is important that any uncertainties or lack of community support are considered through ongoing public consultation.
- 4.7 In regard to specific SA objectives, uncertainty exists as to flood risk and other issues resulting from climate change. The PPS25 requirement for a Flood Risk Assessment will deal with flood risk, but changing policy guidance on climate change needs further monitoring. Additionally, the Preferred Options include proposals to increase the quality and quantity of greenspace in the area. Whilst it is assumed that this will assist in urban cooling and provide land for rainwater soak away, the extent to which such spaces can fulfil this function is uncertain.
- 4.8 Similarly, data on greenhouse gas production, pollution and waste, which inevitably result from new development have many different and, in some sectors, uncertain variables, making it more difficult and subjective to assess. In these instances, and in others, where the effect has been described as “unknown”, this indicates that positive or negative impacts may arise from the preferred options but there is not a definitive answer, or there is an effect but it is difficult to determine. Further information may become available, including analysis through consultation, which can improve the prediction and evaluation of effects.
- 4.9 The data collected (base line report) has been used to determine key issues as well as forming the baseline for identification of effects. There is the risk that the information collected is not from the most appropriate source and/or other more reliable sources of information become available in time. This can make the assessment of effects through comparison of data over a time series difficult, particularly if the methodology differs, or if the boundaries of an area on which data is based change. There are also

uncertainties that data may not be available at a local level to determine the effects of policies, due to the nature and scale of effect.

- 4.10 Other risks and uncertainties may arise as the SA process develops in preparation of the EASEL AAP.

APPENDIX 1 Sustainability Appraisal (SA) Framework,

Sustainability Appraisal objectives, targets and indicators

4.49 The main aim of an SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the AAP. To ensure that the EASEL AAP has taken on board relevant sustainability issues, a set of sustainability appraisal objectives were used. The objectives (including sub objectives) have been drawn from those in the Leeds Guide to SA. These have been used to form the appraisal framework against which the AAP has been assessed. These objectives and sub-objectives are shown in table 4.8 below.

Table 4.8 Objectives and sub-objectives

SA OBJECTIVES	SA SUB-OBJECTIVES
ECONOMIC OBJECTIVES	
1. Maintain or improve good quality employment opportunities and reduce the disparities in the Leeds' labour market.	<ul style="list-style-type: none"> a. Will it maintain or improve current employment rates in Leeds? b. Will it raise average earnings? c. Will it support employment opportunities for people who live in or close to the area? d. Will it help develop the skills of people who live in or close to the area? e. Will it support equal employment opportunities? f. Will it reduce the disparities in employment rates between deprived and affluent parts of Leeds? g. Will it reduce the high rates of unemployment among black and ethnic minority groups? h. Will it improve access to affordable and quality childcare?
2. Maintain or improve the conditions which have enabled business success, efficient economic growth and investment.	<ul style="list-style-type: none"> a. Will it support existing businesses? b. Will it encourage investment? c. Will it improve productivity and competitiveness? d. Will it encourage rural diversification? e. Will it reduce slowness in negotiations over s106 agreements? f. Will it increase openness in obligations? g. Will it help reduce unpredictability for developers about the size and type of obligations they are likely to be asked for? h. Will it increase accountability over how funds gathered by s106 agreements are spent?
SOCIAL OBJECTIVES	
4. Improve conditions and services that engender good health and reduce disparities in health across Leeds	<ul style="list-style-type: none"> a. Will it promote healthy life-styles, and help prevent ill-health? b. Will it create a better balance between primary and hospital services, and make more health services available locally? c. Will it address health inequalities across Leeds?
5. Reduce overall rates of crime, and reduce the disparities in crime rates across Leeds.	<ul style="list-style-type: none"> a. Will it encourage crime reduction through design? b. Will it help address the causes of crime?

SA OBJECTIVES	SA SUB-OBJECTIVES
	<ul style="list-style-type: none"> c. Will it help reduce the fear of crime? d. Will it help to reduce disparities in crime rates across Leeds?
6. Maintain and improve culture, leisure and recreational activities that are available to all	<ul style="list-style-type: none"> a. Will it increase provision of culture, leisure and recreational (CLR) activities/venues? b. Will it increase non-car based CLR activities? c. Will it increase participation in CLR activities by tourists and local people d. Will it preserve, promote and enhance local culture and heritage? e. Will it improve access and affordability of CLR facilities?
7. Improve the overall quality of housing and reduce the disparity in housing markets across Leeds?	<ul style="list-style-type: none"> a. Will it make housing available to people in need (taking into account requirements of location, size, type and affordability)? b. Will it reduce (the risk of) low housing demand in some parts of the city, and reduce the number of empty properties? c. Will it increase the availability of affordable housing, especially in high demand areas? d. Will it help improve the quality of the housing stock and reduce the number of unfit homes? e. Will it improve energy efficiency in housing to reduce fuel-poverty and ill-health? f. Will it encourage the use of sustainable design and sustainable building materials in construction?
8. Increase social inclusion and active community participation	<p><i>Social inclusion</i></p> <ul style="list-style-type: none"> a. Will it provide more services and facilities that are appropriate to the needs of ethnic minorities, older, young and disabled people? b. Does it enable less-well resourced groups to take part? c. Does it take steps to involve difficult to reach groups? d. Will it increase financial inclusion? <p><i>Community participation</i></p> <ul style="list-style-type: none"> e. Will it give the community opportunities to participate in decisions? f. Will local community organisations be supported to identify and address their own priorities?
9. Increase community cohesion	<ul style="list-style-type: none"> a. Will it build better relationships across diverse communities and interests? b. Will it increase people's feelings of belonging? c. Will it encourage communities to value diversity? d. Could it create or increase tensions and conflict locally or with other communities?
ENVIRONMENTAL OBJECTIVES	
10. Increase the availability of parks and greenspace and improve the quality of greenspace.	<ul style="list-style-type: none"> a. Will it improve the availability of publicly accessible parks and greenspace? b. Will it address deficiencies of greenspace in areas that are under-provided? c. Will it improve the quality and management of parks and greenspace across Leeds? d. Will it improve the security of greenspace?
11. Minimise the pressure on greenfield land by efficient land use patterns that make good use of derelict and previously used sites & promote balanced development	<ul style="list-style-type: none"> a. Does it make efficient use of land by promoting development on previously used land, re-use of buildings and high densities? b. Will it promote the development of communities with accessible services, employment, shops and leisure facilities?
12. Maintain and enhance, restore or add to biodiversity or geological conservation interests	<ul style="list-style-type: none"> a. Will it protect and enhance existing habitats, especially priority habitats identified in the UK and the Leeds Biodiversity Action Plan?

SA OBJECTIVES	SA SUB-OBJECTIVES
	<ul style="list-style-type: none"> b. Will it protect and enhance protected and important species? (Important species are those identified in the UK and the Leeds BAP.) c. Will it protect and enhance existing designated nature conservation sites? d. Will it provide for appropriate long term management of habitats? e. Will it make use of opportunities to create and enhance habitats as part of development proposals? f. Will it protect / mitigate ecological interests on previously-developed sites? g. Will it protect sites of geological interest?
13. Reduce greenhouse gas emissions	<p>Will it reduce greenhouse gas emissions from:</p> <ul style="list-style-type: none"> a. Households? b. Commercial and industrial activities? c. Transport, agriculture, landfill & mining?
14. Improve Leeds' ability to manage extreme weather conditions including flood risk and climate change	<p><i>Flood Risk</i></p> <ul style="list-style-type: none"> a. Will it prevent inappropriate development on flood plains and prepare for the likelihood of increased flooding in future? <p><i>Other climate change effects</i></p> <ul style="list-style-type: none"> b. Will it improve the capacity to cope with the increases in strong winds and storms? c. Will it improve the capacity to cope with higher temperatures?
15. Provide a transport network which maximises access whilst minimising detrimental impacts	<ul style="list-style-type: none"> a. Will it reduce the need to travel by increasing access to key services and facilities by means other than the car? b. Will it ease congestion on the road network? c. Will it provide/improve/promote information about alternatives to car-based transport? d. Will it reduce the number of journeys by personal motor transport and by air? e. Will it make the transport/environment attractive to non-car users? f. Will it encourage freight transfer from road to rail and water? g. Will it encourage employers to develop green travel plans for staff travel to/from work and at work? h. Will it reduce the causes of transport-related accidents?
16. Increase the proportion of local needs that are met locally	<ul style="list-style-type: none"> a. Will it support the use of more local suppliers for agriculture, manufacture, construction, retailing and other services? b. Will it ensure that essential services (e.g. employment, health services and shops) and resources to serve communities are within reasonable non-car based travelling distance? c. Will it provide appropriate housing for local needs? d. Will it support the vibrancy of city, town and village centres? e. Will it encourage ICT links to connect isolated and disadvantaged communities to services and resources?
17. Reduce the growth in waste generated and landfilled.	<ul style="list-style-type: none"> a. Will it minimise waste? b. Will it promote re-use, recovery and recycling of waste? c. Will it provide facilities for recycling and recovering waste?
18. Reduce pollution levels	<ul style="list-style-type: none"> a. Will it promote the clean-up of contaminated land? b. Will it reduce air, water, land, noise and light pollution?

SA OBJECTIVES	SA SUB-OBJECTIVES
	<ul style="list-style-type: none"> c. Will it reduce the risk of pollution incidents and environmental accidents? d. Will it promote neighbourhood cleanliness?
19. Maintain and enhance landscape quality	<ul style="list-style-type: none"> a. Will it maintain and enhance areas of high landscape value? b. Will it protect and enhance individual features such as hedgerows, dry stone walls, ponds and trees? c. Will it increase the quality and quantity of woodland features in appropriate locations and using native species? d. Will it protect and enhance the landscape quality of the City's rivers and other waterways? e. Will it take account of the geomorphology of the land?
20. Maintain and enhance the quality and distinctiveness of the built environment	<ul style="list-style-type: none"> a. Will it ensure new development is well designed and appropriate to its setting? b. Will it ensure development is consistent with Leeds City Council design guidance for the built, natural and historic environment? c. Will it support local distinctiveness?
21. Preserve and enhance the historic environment	<ul style="list-style-type: none"> a. Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in urban and rural areas? b. Will it protect and enhance listed buildings, conservation areas and other designated historic features and their settings?
22. Increase the efficient use of energy and natural resources and promote sustainable design.	<ul style="list-style-type: none"> a. Will it increase energy and water efficiency in all sectors? b. Will it increase energy from renewable sources? c. Will it promote the energy, water and resource efficiency of buildings? d. Will it increase sustainable urban drainage? e. Will it increase efficiency in use of raw materials? f. Will it minimise the loss of high quality agricultural land and soils? g. Will it support reduced resource use by business?

