

## **Appendix 5**

### **Summary of the City Centre Area Action Plan Sustainability Appraisal**

## 1. INTRODUCTION

### PURPOSE

This report provides a commentary on the sustainability appraisal (SA) of the Leeds City Centre Area Action Plan objectives, alternative options and Preferred Options. The City Centre Area Action Plan is one of a series of local development documents being produced as part of the new planning framework for Leeds known as the Local Development Framework (LDF).

### WHAT IS A SUSTAINABILITY APPRAISAL?

It is a requirement of the new planning system that Development Plan Documents are prepared with a view to contributing to the achievement of sustainable development. At the heart of sustainable development is the idea of ensuring a better quality of life for everyone, now and for future generations. A widely used definition of sustainable development is: “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.

The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the proposals and policies in a DPD, from the outset of the preparation process, so that decisions can be made that accord with the objectives of sustainable development. The SA also needs to comply with the European Directive on Strategic Environmental Assessment (SEA) which requires that the significant effects that the plan is likely to have on the environment are identified.

### METHODOLOGY

The SA was carried out in accordance with Government guidance on sustainability appraisals set out in the document: ‘*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*’ (ODPM, November 2005). This incorporates the requirements of the SEA Directive.

The guidance sets out a number of stages to carrying out a sustainability appraisal. The first stage (Stage A) involves preparing a Scoping Report which sets the context and objectives, establishes the baseline and decides on the scope of the SA. The Scoping Report for the City Centre Area Action Plan was published in June 2005 and sent out for consultation with the four environmental consultation bodies (Environment Agency, English Heritage, English Nature and the Countryside Agency – these last two are now amalgamated into one Agency known as Natural England) and the Leeds Initiative (the Local Strategic Partnership). A number of changes were made to the SA framework as a result of feedback from the consultees.

The revised SA framework used to assess the CCAAP objectives and alternative options is set out at the end of this report. It includes 22 sustainability objectives divided into economic (2 objectives), social (7 objectives) and environmental (13

objectives). Under each objective there are a number of detailed decision-making criteria which are used to help assess the effects of the plan against that objective.

The next stage of the SA process (Stage B) involves testing the CCAAP objectives against the SA framework and developing the CCAAP options and assessing their effects. The CCAAP objectives were established in the Early Issues consultation document published in July 2005. The options are set out in detail in the 'Issues and Options' consultation document (April 2006).

Following the 6 week consultation period on the Issues and Options the results were used, along with the sustainability appraisal results, to develop the Preferred Options. The Report entitled 'Summary of Responses' shows how this was done. Further sustainability appraisal then took place on the Preferred Options to help refine them even further and identify ways of mitigating against any adverse effects.

Stage C of the SA process requires the whole SA to be written up and presented within a Sustainability Appraisal Report. The SA Report must clearly show that the requirements of the SEA Directive have been met and it will be one of the Documents released for public consultation with the Preferred Options Report.

## **2. APPRAISAL OF OBJECTIVES**

The following aim and objectives were tested against the appraisal framework:

Aim – support sustainable development for Leeds to maintain its role as the regional centre and a principal city of Europe

10 Objectives:

1. Promotion & maintenance of a high quality environment,
2. More greenery
3. Distinctive character & personality
4. Vibrancy with residential living, shopping, leisure & culture
5. Support growth of employment uses
6. Promote development opportunities & supporting infrastructure
7. Accessibility & appeal to all the community
8. Good connections to other areas, and ease of movement within the city centre
9. Safe & secure
10. Plan the city centre with regard to its context as centre of the Leeds sub-region & extend the benefits of the city centre to neighbourhoods throughout the city

The aim of the CCAAP scored very well against sustainability appraisal objectives. It rated a positive score against every one of the 21 objectives.

Overall the objectives showed a high degree of compatibility with sustainability appraisal objectives. There were areas of concern under economic CCAAP

objectives 5 and 6, where there was some conflict with environmental sustainability appraisal objectives. This is because economic growth and development inevitably leads to more greenhouse gas emissions, pollution and waste. However these adverse effects can be mitigated for and this has been achieved to some extent by the development of Preferred Options on Sustainable Construction (PO-23) and Renewable Energy (PO-24) and by locational policies which ensure that employment uses and other trip generating uses are kept within the city centre where there is optimum accessibility by public transport (eg PO- 02, PO-03, PO-09, PO-12).

### **3. APPRAISAL OF OPTIONS**

#### GROWTH AND SUCCESS

##### 1. Approaches to Growth

The sustainability appraisal showed that choice b) growth of Leeds City Centre to be market driven with a firm harness to ensure delivery of quality, is a very sustainable choice as it scored positive for almost every sustainability appraisal objective. It shows that a firm harness on the market is vital for us to achieve all the other objectives which we have identified as being important for Leeds.

##### 4. Size of City Centre

To keep the City Centre boundary as it is, would result in negative impacts in the long term on economic objectives.

To contract the City Centre boundary would gain positive scores under transport efficiency but would predominately produce negative scores, especially in the long term, for economic, social and some environmental objectives.

To expand the City Centre boundary would mostly produce a good number of positive scores, however there are two negative scores for greenhouse gas emissions and pollution. It is therefore important that if a preferred option is developed which expands the boundary of the City Centre – this is done so in union with detailed policies to address public transport accessibility and require new development to be energy efficient and use renewable energy.

##### 5. Provision of Office Space

Sustainability appraisal of choices in this option highlights the value of keeping B1 office space within the City Centre as the most accessible location for both clients and employees.

Choice b) ensuring that a minimum amount of B1 office space within a defined zone, gained the most positive scores of the three options and with no negatives. Choice c) no requirement for B1 office space should apply, gained no positive scores and a number of negatives and is therefore not a sustainable choice.

## 7. Training and Employment Agreement

The negotiation of training and employment agreements as part of developments, scores very well against sustainability appraisal objectives. Making this a requirement for all developments above 1,000 sq. m. gains the most positive scores as it means that more agreements would come into force and therefore maximises the benefits.

## MOVEMENT

### 1. Congestion

Choices a) Park and Ride, b) enhanced bus routes, c) new train stations and e) demand management all score generally well with no negative scores. Choice b) enhanced bus routes, achieves the most positive scores and has two double positive awards for improving health and providing a transport network which maximises access whilst minimising detrimental impacts.

Choice d) restraint on commuter car parking, also delivers a number of positive scores. However, it could lead to more pressure for development on greenfield land and therefore gets a negative score for that objective. There are also negatives in the short and medium term for possible effects on economic investment but this is likely to improve in the long term as the economy realises the benefit of reduced congestion.

Choices f) building and widening roads and g) allowing traffic to self-regulate, both score poorly under sustainability objectives. f) has some benefits in the short term but this becomes worse in the long term, as new roads fill up with more cars. g) does not achieve any positive scores and has four double negatives which indicates that it is not a sustainable option.

### 2. Car Parking for Visitors

Sustainability appraisal of whether visitor parking should be expanded or reduced in the City Centre did not really offer any help in choosing the best option, as advantages and disadvantages tended to cancel each other out. If reduction of visitor parking frees up land to be used as open space/greenery then this becomes the more sustainable choice.

### 3. Car Parking for Commuters

The appraisal showed that the expansion of car parking for commuters is not sustainable in the long term. However, reducing car parking for commuters in the City Centre did not score as well as one might have expected. This is due to uncertainty about how land previously used for parking might be used instead and

concerns about stifling economic investment. There are opportunities for reduced commuter parking with other measures to mitigate against these negative effects.

#### 4. Public Transport Infrastructure

All choices which involved improvements to public transport infrastructure achieved some positive scores especially under the objective of providing a transport network, which maximises access whilst minimising detrimental impacts – where they achieved double positives. Choice a) leveraging in contributions, is the only one of the five that had a negative score and that was due to concerns that contributions may deter developers however, it is possible to mitigate against this by ensuring that the contribution requirement is set at a fair level so developments remain viable. Choice f) no public transport improvement, scored a lot of negatives and is therefore not a sustainable choice.

#### 5. Connecting the South of the City Centre

There were no negative scores amongst any of the choices. Choice b) more bridges over the river and canal, came out slightly better than the others.

#### 6. New Stations and Interchanges

Protecting land for new stations and interchanges scored a lot of positives and no negatives and is the most sustainable choice of the two.

#### 7. Travel Planning

Expanding the use of travel plans scored well with no negatives and is the most sustainable of the three choices.

#### 8. Congestion Charging

The sustainability appraisal showed that limiting congestion charging to just the City Centre produces a negative and double negative score which do not occur if the congestion charge is spread more widely across the City. This is primarily because it is anticipated that a congestion charge in the City Centre would encourage more people to drive around the edge of the centre to avoid the charge and this would have bad effects in terms of pollution, noise, road safety and stress for those people living in the inner city – often those wards within the highest levels of deprivation.

#### 9. Cycling

All choices for encouraging cycling score well with no negatives.

## 10. Walking

All choices for encouraging walking score well with no negatives.

## 11. Road Safety

All choices for improving road safety score well with no negatives. Choices e) zones where traffic is prohibited or limited and f) determining HGV and other vehicle entry, have the potential for additional positive scores if carried out at locations where cultural, leisure and recreational activities take place.

## 12. Use of the River

Promoting the use of the river for a commuter river bus into the City Centre scores well as a sustainable choice. The score can be further improved by ensuring that the tourist industry is able to take advantage of the river bus and also by ensuring that wildlife habitats along the river are not disturbed.

## MANAGING RESOURCES

### 1. Flood Risk

Choice b) appropriate measures to reduce flood damage within the development and to reduce flood risk overall, scored the best of the three choices. Although choice c) refusing permission in flood risk areas and expecting development in other areas to take suitable measures to reduce flood risk overall, scored a lot of positives it also had negative scores primarily because of its economic effects and possible pressure on greenfield land. Further SA on this option has been carried out subsequent to the Council receiving the draft Strategic Flood Risk Assessment (see below on Flood Risk).

### 2. Design of Buildings to Save Energy

All choices scored well with no negatives except for a concern that choice d) 10% of energy use from renewables for all buildings could be too onerous for small developments due to capital costs. This could be mitigated against in a number of ways, for example offering grant funding and is expected to improve as new technologies become available and become cheaper.

### 3. Local Sustainable Building Materials

Encouraging developers to use materials in City Centre developments from local sustainable sources scores very well as expected and with no negatives, It is the only sustainable choice in this option.

#### 4. Re-use and Recycling

Both choices in this option have some positive scores and no negatives. However, choice a) building fabric longer lasting and floorspace more adaptable, achieves additional positive scores which only emerge in the long-term.

#### 5. Lighting

Controlled lighting scores much better than minimal lighting, primarily due to energy efficiencies.

#### 6. Biodiversity

Generally, this option has no significant impact for either choice, on any of the sustainability appraisal objectives except the one on biodiversity. Under biodiversity the choice which encourages protecting and enhancing biodiversity scores better.

#### 7. Waste

Choices have no significant impact on sustainability appraisal objectives except for sustainability appraisal objective 17 which refers to reducing the growth in waste. Against this objective, choice a) to provide sufficient and accessible waste collection and recycling areas within the curtilage of development scores the best.

#### 8. Litter Collection

Choices have no significant impact on sustainability appraisal objectives except for sustainability appraisal objective 17 which refers to reducing the growth in waste. Against this objective, choice a) scores the best.

### OPEN SPACE AND GREENERY

#### 1) – 4). Provision of Greenspace

Provision of more greenspace in the City Centre scores very well against sustainability appraisal objectives. However, there is a negative score for economic growth because the requirement to provide greenspace can be a cost for developers. The negative impact can be minimised by ensuring that contributions are set at a fair rate which allows development to remain viable. There is also a negative score for sustainability appraisal objective 11 which is about efficient land



use patterns. It is recognised that the City Centre attracts a variety of types of land-use and these are predominately market driven. Greenspace only tends to occur when it is a requirement of development and therefore would not be likely to displace other uses to a greenfield location. More greenspace can also create the opportunity for anti-social behaviour but this can be mitigated for by good design and management.

#### 6). Recreational Scope

All choices for provision of recreational and passive space have some positive impacts and no negatives.

#### 7). Out of Centre Contributions

Generally, more contributions means that more benefits can be achieved.

#### 8). Enhanced Management

The appraisal showed that positive impacts for public realm infrastructure will only arise if there is also maintenance. Without maintenance the scores become negative especially in the long term.

#### 9). Pedestrianisation and Green Networks

Both choices for greening-up existing pedestrian routes and creating new ones score positively. It is noted that there could be a negative impact of creating new green routes if they create opportunities for muggers. Advice would therefore be needed from the Council's Architectural Liaison Officers.

#### 10). Hours of Access

Increasing the hours of access to public spaces allows more people to use the spaces as they want to however, it should be noted that if spaces are being used at night it could create more opportunities for muggers.

#### 12). Hidden Watercourses

Opening up watercourses for amenity, wildlife habitats or public art creates a number of positive scores and is the more sustainable choice of the two.

#### 13). Recreation on the Aire

Promoting recreation on the River Aire produces a number of positive scores against sustainability appraisal objectives. However, it would be important to ensure that sensitive areas of the river with biodiversity value are adequately protected.

#### 14). Waterfront Planting and Habitat Management

Both choices have no significant impact on sustainability appraisal objectives except for sustainability appraisal objective 12 on biodiversity, where they can both have positive scores.

### DESIGN AND CONSERVATION

#### 1. Design Approaches

Appraisal of choices under this option showed them to have very little significant impact on sustainability appraisal objectives. However, a possible score was noted for choice a) controlling the design of new buildings and spaces by informing design guidelines, for its contribution to enhancing the quality and distinctiveness of the built environment.

#### 2. Safety and Security

Only one sustainability appraisal objective was affected by these choices and that is sustainability appraisal objective 5 on reducing crime and disparities in crime rates. All three choices gained positive scores against this objective with the third choice combining the initiatives of the other two, scoring a double positive.

#### 3. Conservation Areas

Extending Conservation Areas in the City Centre came out as the most sustainable of the three choices. However, it should be noted that the restrictive nature of Conservation Areas means that it may make it more difficult to mitigate against adverse weather conditions or to require renewable energy provision within Conservation Areas. These factors need to be taken into account if this choice is to be developed as a preferred option.

#### 4. Active Places

It is more sustainable to ration uses which generate activity to a limited number of localities than it is to accept such uses in all mixed-use developments.

## 5. Tall Buildings

Choice c) accepting tall buildings within defined zones, is the most sustainable of the three choices. Choice b) accepting tall buildings anywhere in the City Centre scored well for minimising pressure on greenfield land but it produced a number of negative impacts primarily around the impact on the historic environment and landscape quality.

Choice c) can maximise benefits by locating tall buildings close to integrated transport nodes.

## 6. City Centre Boundary – Visual Definition

Providing visual definition at edges and gateways to the City Centre has very little impact on sustainability appraisal objectives. It also depends on how it is done as it was noted that it could widen disparities between the City Centre and inner city areas.

## 7. Coherence of Routes

Whether or not City Centre routes are designed to cohere with each other has no significant impact on SA objectives apart from sustainability objective 20 which refers to the quality and distinctiveness of the built environment. Having coherence between routes gains a positive score against this objective.

## 8. Design Planning Process

The inclusion in the City Centre Area Action Plan of planning processes for dealing with design and conservation gives people further opportunity to be included in debating the good design of developments.

## ENTERTAINMENT

### 1. Focal Points or Not

Having entertainment focal points in the City Centre brings positive impacts in terms of supporting the vibrancy of the City Centre and concentrating noise into specific areas so that detrimental impacts on City Centre residents can be minimised.

### 2. Focal Points – Land Use Controls

The sustainability appraisal showed that there is little difference in impact between whether focal points are merely indicative or whether they are operated by planning controls. However, there was a concern that full and partial controls may stifle

investment and this could become worse over time if space ran out to meet the demand for entertainment uses.

### 3. Focal Points – Controls

Having controls over the variety of mix of entertainment uses within focal points does not have a great deal of impact on sustainability appraisal objectives. However, positive scores could be achieved if controls reduced the amount of pubs and ensured facilities were provided that appealed to a greater range of people. This has implications for the wording of the Council's preferred option.

### 4. Controls to Avoid Nuisance

Choice b) amenity and safety controls for bars in designated licensing zones, is the most sustainable of the three choices.

### 5. Protection of the Entertainment Uses.

Protecting certain entertainment uses such as theatres, cinemas and museums scored very well. Not protecting them scored badly and is not a sustainable choice.

### 6. Concert Hall

Locating a concert hall within the City Centre scored very well. Locating it outside the City Centre produced a number of negative scores primarily around increasing travel and pollution.

### 7. Arena

Locating an arena within the City Centre scored very well. Locating it outside the City Centre produced a number of negative scores primarily around increasing travel and pollution. It was considered that the same scores applied to the location of a casino.

## RESIDENTIAL

### 1. Residential Development in the City Centre

Promoting City Centre living came out as a more sustainable choice than discouraging it. This was primarily due to City Centre living reducing the need to travel (backed up by research by Rachel Unsworth) and reducing pressure on greenfield land because it helps to meet our RSS housing requirement (but note that this may not provide for different housing needs). There was a concern that too much residential development could displace employment uses, especially if left

unchecked in the long term, this could be mitigated for by reinforcing protection of existing employment uses and/or policy choices suggested in the next option on Residential Quarters. There was also a concern that because Leeds city centre has a lot of land in the flood risk zone that promoting residential development could lead to more vulnerable uses being located in flood risk areas and increasing the risk of flooding overall – this is mitigated for by policy choices that have been suggested in the Managing Resources Option.

## 2. Residential Quarters

If residential development is to be promoted it is more sustainable if it is only promoted in residential quarters and not allowed anywhere in the City Centre, particularly if residential quarters are located close to transport nodes. It was noted that residential quarters could help foster community spirit and contribute to vibrancy as well as ensure that employment uses are not threatened by take over from residential uses.

## 3. Dwelling Mix

Sustainability appraisal indicates that it is better to control the mix of types and sizes of dwellings in new residential development than to leave it to the house builders to decide. There was little difference in results between whether to do this in all development or whether to do it in just major developments but in both scenarios it was noted that the benefits tend to emerge in the long term.

## 4. Associated Open Space

The most sustainable option is to require greenspace for all residential developments. Not providing greenspace scores very badly against social and environmental objectives.

## 5. Funding Shops and Facilities

It is more sustainable for new residential developments to fund facilities needed by residents as it is a way of helping to provide facilities such as doctors and dentists which might otherwise not be provided. There were no negative scores against these choices as it was not anticipated that this requirement would have any significant impact on economic objectives however it may be necessary to define a size threshold over which the funding would be required to ensure that smaller schemes remain viable.

## 6. Purpose Built Student Accommodation

Allowing student accommodation anywhere in the City Centre has no significant impact on any of the SA objectives. Allowing student accommodation only in peripheral locations that are well connected to the Universities by public transport scored two positives because it reduces the need to travel – this is therefore the more sustainable option but there may be ways to make the first option more sustainable for example – making good use of historic buildings.

## RETAIL

### 1. Expansion of the Shopping Quarter

Under economic objectives the option for limited expansion of the PSQ scored better than no expansion but increased density. There was uncertainty as to what the implications of these policy interventions might be. For example if there is no expansion in density but the PSQ is allowed to increase in density then this might potentially bring about positive scores in reducing travel because it keeps the centre relatively compact however if there is limited expansion of the PSQ this could lead to a shopping centre which is too disparate for easy access and therefore encourages people to drive to different parts of it. There is uncertainty as to how people might respond in their patterns of behaviour however to ensure that scores are maximised choice b) could be accompanied by a deliberate attempt to ensure that the PSQ does not become too disparate.

### 2. Retail Format

To resist all extensions to retail warehouses scores the most poorly against appraisal objectives compared to the other choices (although not massively worse). Encouraging retailers to modify their format so that they can fit into the PSQ scores one positive for encouraging uses to stay in the centre which is the most accessible location. Limited expansion of retail warehouse designations also has one positive because it helps reduce pressure on greenfield sites, however it also has one negative because it encourages car use. Generally speaking the SA is not particularly useful in helping to choose between the options in this case.

### 3. Mix of Shopping Uses

This policy choice only had a significant effect on one of the sustainability appraisal objectives and that was SA objective 16 which strives to ensure that local needs are met locally. Under this objective it was noted that choice b) would score positively because up-to-date shopping frontage policies should help to ensure that the city centre retains comparison shopping in the PSQ.

### 4. Convenience Shopping

Allowing convenience shops only in locations in the City Centre where there is a lack of convenience shops (choice b) scored well in the sustainability appraisal with 4 positives, 0 negatives and 2 possible further positives depending on public behaviour. Allowing convenience shopping only in local centres (choice c) also scored reasonably well with 2 positives and one double positive (for increasing the proportion of local needs met locally) and a possible 4 more positives depending on public behaviour. Allowing convenience shopping anywhere in the City Centre (choice a) should be approached with caution, because although it did not directly result in any negative scores it was noted that there could potentially be 4 negatives if shops become too dispersed and therefore do not remain viable with the result that people then have to travel by car to go shopping.

## 7. Protection of Existing Convenience Shopping

Protecting existing convenience shopping from change of use scored very well in the SA with 5 positives and 2 double positives. However it was noted that there could potentially be 2 negative scores if shops don't remain viable and have to close – resulting in a vacant building which might then fall into dereliction.

Conversely, providing no protection for convenience shopping scored poorly with 6 negatives and 1 double negative and no positives. This indicates that the CCAAP does need to introduce a form of policy intervention to protect convenience shopping in the City Centre.

### ACCESS

#### 1. Car Parking Restraint

The Sustainability Appraisal indicated that there should be exceptions against car parking restraint for disabled people. This was particularly important for maximising access for disabled people.

#### 2. Ease of Access from Public Transport Stops

This option considered whether or not investors in public transport should consider distances from bus stops to destinations and between modes of transport. There is a very clear difference between the two choices in terms of sustainability. 'Yes investors should' was overwhelmingly more sustainable than 'no investors shouldn't'. It was particularly important for increasing community cohesion so that disabled people are not segregated from other people and can integrate without barriers. It also meant that there were less barriers to them taking up employment opportunities which helps us to achieve our SA objective of reducing disparities in the labour market.

#### 3. Public Conveniences and Baby Changing Facilities

The Sustainability Appraisal indicated that it is important to require these facilities to be sure that SA benefits occur, for example engendering good health and making people feel safe. Although encouraging the facilities would possibly result in them being provided, the SA team did not feel certain enough of this to enable them to credit the option with positive scores. There was also a concern that developers should be required to provide family friendly facilities to ensure that the City Centre is available for all.

#### 4. Places to Sit and Relax

The SA indicated that more positive scores can be achieved by providing places to sit and relax in areas of activity only rather than equally spread throughout the City Centre. This is primarily because people are safer when there are lots of people around rather than in isolated locations where they may feel vulnerable. Also, seating can be provided in areas of leisure and recreation to enhance their function

and encourage observers of activities to help foster understanding and appreciation of them.

#### 6. Affordability

This option endeavoured to look at how we might be able to make the City Centre more affordable to people. The choice that scored the most positives was providing lower rate car parking for particular groups, it could score even more if it was extended to cover reductions on public transport prices as well but this is probably beyond the control of planning. The particular groups should include elderly and disabled people to maximise positive scores.

#### 7. Housing for Elderly People

The Sustainability Appraisal indicated that it is more sustainable for the CCAAP to expect special provision for housing for over 55s. There were slightly more positive scores if a small proportion is provided in all developments rather than just providing sheltered housing clusters in larger developments.

#### 8. Facilities for Families with Children

All the choices scored well in the Sustainability Appraisal with no negative scores. However it was noted that playgrounds can provide opportunities for crime unless they are well designed and sensitively located.

#### 9. Indoor Venues for Teenagers

Both choices score the same in the Sustainability Appraisal.

#### 10. Accessibility for Disabled People

The Sustainability Appraisal clearly indicates that development should be designed to be as accessible as possible for disabled people. However it does not offer much help in choosing between whether this should be in all developments or whether there should be exceptions for conservation and heritage concerns. It was noted that exceptions for historic buildings can affect accessibility to uses taking place in those buildings therefore if that choice is the preferred option it is important to consider how this accessibility issue can be overcome.

### FLOOD RISK AND RESIDENTIAL DEVELOPMENT

Since the SA of the flood risk option was carried out, detailed in the section on Managing Resources, the Council has received a draft Strategic Flood Risk Assessment which has allowed us to develop a greater understanding of the nature of flood risk in the city centre. Consequently further SA has been carried out on the implications of residential development in high flood risk areas. This has examined three options – no residential development in Zone 3 (high flood risk), residential development allowed in Zone 3, residential development only allowed in Zone 3 if accompanied by suitable mitigation.



The second option was the least sustainable particularly because it puts people's homes at risk and doesn't do anything to manage flood risk. The first option only scored well against the one SA objective on managing flood risk (SA14) and it could potentially lead to negative scores under other SA objectives, particularly economic where it was noted that it could lead to blight. The third option was the most sustainable overall because it allows the efficient re-use of brownfield land, gives opportunity for biodiversity interests to be promoted and allows housing to be provided with appropriate levels of mitigation. However, it was noted that in the long term, if climate change leads to a rise in flood levels, there could be a greater risk to residential development built in Flood Zone 3. It is therefore recommended that the Preferred Option on Flood Risk mitigation (PO-24) should require flood control measures to take account of climate change.

## PROPOSAL AREAS

### 1. City Gate

The proposal generally scored well, particularly because the prime use is offices which scored very well for assisting economic growth. Proposals for open space, a riverside walkway and footbridge attracted positive scores for SA objectives on greenspace (SA6) and increasing pedestrian and cycle accessibility (SA15). Scores were enhanced by the proposed hotel and leisure uses as well as ancillary supporting uses. Existing car parking is proposed to be retained and possibly increased on this site and this led to negative scores against the SA objective on reducing greenhouse gases. However it was noted that this could be mitigated for to some extent by ensuring that the car parking changes from the current long stay use to short stay. This will ensure that the car parking does not encourage commuting as it will serve no purpose for those wishing to drive to work and park the car all day. It was noted that parts of the site were in a high flood risk zone and this has implications for the provision of a hotel because it is a use which is more vulnerable to flood. To mitigate negative effects against SA objective 14, it is important that hotel use is accompanied by appropriate measures for flood defence both on and off site and emergency planning procedures. These should be designed to accommodate rises in flood level resulting from climate change.

### 2. Elmwood Road and Brunswick Terrace

The combination of uses proposed on the site generally scored well in terms of sustainability. These are - offices, leisure, hotel plus related conference and exhibition uses, ancillary small scale supporting uses, some residential, public space and underground short stay parking. Offices may help to improve current employment rates. The site is currently a derelict building plus former car park, therefore this increases amount of office space but doesn't do anything specific to reduce disparities in the Leeds labour market, a specific requirement for training may help do that. It was noted that public space scores better if it is specifically green space rather than hard landscaping and as this applies to all open spaces it has therefore been included as a requirement in the Preferred Option on the use of open space (PO-25).

Proposed car parking could potentially lead to negative scores against the SA objective on reducing greenhouse gases. However it was noted that this could be

mitigated for to some extent by ensuring that the car parking is short stay. This will ensure that the car parking does not encourage commuting as it will serve no purpose for those wishing to drive to work and park the car all day.

3. Kidacre Street

**(Work in progress – the sustainability appraisal conclusions of the 7 other proposal areas will be tabled at the Development Plan Panel meeting).**