

LEEDS CORE STRATEGY SELECTIVE REVIEW

SUBMISSION DRAFT

**SUSTAINABILITY APPRAISAL NON TECHNICAL
SUMMARY**

JUNE 2018

1. Introduction

- 1.1. This document summarises the Sustainability Appraisal (SA) of the Leeds Core Strategy Selective Review Submission draft (CSSR). For a full assessment including the application of the Strategic Environmental Assessment Directive and the Habitats Directive (92/43/EEC) please see the SA Report.
- 1.2. This non-technical summary includes the essential scoring components of the SA and summary of the results and significant effects of policy options on the SA objectives, including assessment of negative impacts and how they can be mitigated.

2. Scoping Report

- 2.1. The SA Scoping Report was published and sent out for consultation on the 21st May 2017 to the three statutory SA consultees (Natural England, the Environment Agency and Historic England). The five week consultation period ended on 30th of July 2017.
- 2.2. Comments were received from the statutory consultees suggesting amendments to the SA Framework, baseline information and additional plans and strategies relevant to the SA. These were incorporated into the SA of the Publication Draft.

3. Publication Draft SA

- 3.1. The Publication Draft Sustainability Appraisal and Non-Technical Summary were made available for comment during the 6 weeks of consultation in February and March 2018 and the three statutory consultation bodies were notified. The Environment Agency responded but made no comment about the SA. Natural England said it welcomed the updated Sustainability Appraisal and had no outstanding concerns. Historic England raised concerns about the scoring of Policy SP7 which the City Council does not accept. The comments and LCC response are set out in the SA Report.

4. The SA Framework, including SA Objectives, Targets, Indicators and Decision Making Criteria

- 4.1. Leeds City Council reviewed the SA Objectives in 2017 with a view to developing a systematic method of scoring planning policies and proposals.
- 4.2. The review led to the following changes:
 - i. Combining the objectives of social inclusion and community participation into one; recasting locally met needs as accessibility; dividing pollution into 4 categories of amenity (noise, light, odour and proximity to

hazardous installations) and combining Landscape and Townscape quality.

- ii. Revisions affecting equal opportunities, education, leisure/recreation, greenspace/indoor leisure, agricultural land, flood risk and energy use.
- iii. Creating a single set of Decision Making Criteria, and Sub-Criteria which can help score more than one objective
- iv. Making links with Best Council Plan & Monitoring Indicators

4.3. The SA consultees were given an opportunity to comment on these changes through the consultation on the SA Scoping Report which set out the revised approach in May 2017.

4.4. The Revised SA Framework sets out 23 objectives (under economic, social and environmental headings), and for each of these there are decision-making criteria and indicators to assist in the assessment of significant effects. Through the SA scoping process the 23 objectives were retained with a number of changes suggested by English Nature made to the decision making criteria of objectives SA08, SA10, SA12, SA17 and SA18.

5. Decision Making Criteria

5.1. The revised sustainability appraisal process involves scoring the impact of plan proposals on the SA Objectives in a simpler way. Previously, each plan proposal was scored against each of the SA Objectives, with the more detailed decision making criteria that sit below the SA Objectives being considered to help reach conclusions. The revised process involves scoring each plan proposal against each of the full set of decision making criteria as a first step. There are now currently 78 primary decision making criteria. Each PDMC relates to at least one SA Objective. Some DMC relate to several SA Objectives. It is easy to score the impact of plan proposals on the PDMC because they constitute single effects that can be easily understood and scored.

5.2. Once a plan proposal has been scored against all of the PDMC the second stage of the process involves grouping the PDMC scores in association with relevant composite decision making criteria (CDMC). This enables the appraising team to see the scores of the range of DMC factors that have a bearing on the CDMC. For example, scoring the CDMC "Reduce disparities in levels of economic and social deprivation" is made easier by seeing the scores of relevant DMC's.

5.3. The final stage of the process sets all relevant DMC and CDMC against the SA Objectives so that the appraising team can easily see the DMC scores and make informed judgements on the SA Objective scores.

5.4. The decision making criteria are set out in the table in Appendix 1. The table also shows the relationship with the SA objectives and indicators of Leeds' Best Council Plan and the Authority Monitoring Report.

6. The CSSR Policies

6.1. The CSSR proposes to amend the following Policies:

- SP6 the housing requirement,
- SP7 housing distribution,
- H5 affordable housing,
- G4 green space provision in residential development,
- EN1 carbon dioxide reduction
- EN2 sustainable design and construction.

6.2. The sustainability appraisal assess these policies in terms of their impact on the SA Objectives.

6.3. Policy SP7 retains only the percentage distribution of dwellings between different Housing Market Characteristic Areas. The absolute numbers are deleted because they do not accord with the new housing requirement. Table 2 concerning distribution to the Settlement Hierarchy is deleted entirely.. An alternative is to delete the policy entirely.

6.4. The CSSR proposes new policies:

- H9 Housing space standards
- H10 Housing access standards
- EN8 Electric Vehicle Charging Points

6.5. The sustainability appraisal assesses these policies and alternatives in terms of their impact on the SA Objectives. The policy alternatives are as follows:

Housing Requirement SP6

With the Low housing requirement being the baseline to score against Alternatives

- i) Low housing requirement at 42,384 (the CLG consultation figure¹)
- ii) Mid-range housing requirement 51,952
- iii) Mid-range housing requirement 55,648
- iv) High housing requirement at 60,528 (SHMA 2017 High Growth Scenario)

Housing Distribution SP7

Against a baseline of not having a policy at all, Alternatives

- i. Retaining the % distribution for HMCAs of SP7
- ii. Not having a distribution policy at all

Affordable Housing H5

Scored against the baseline of not having an affordable housing requirement

¹ <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals> The dwellings per annum figure of 2,649 is set out in the Housing Need Consultation Data Table. Multiplied by the plan period of 16 years gives 42,384 dwellings.

Alternatives.

- i) Maintain existing % targets for 4 geographic zones: i.e. 5% City Centre, 5% Inner, 15% Outer South, 35% Outer North
- ii) Halve the current AH targets: 2.5% for City Centre and Inner. 7.5% for Outer South; 17.5% for Outer North
- iii) Increase the existing targets by 5% for each zone: 10% City Centre, 10% Inner, 20% Outer South, 40% Outer North
- iv) Increase the existing targets by 2% for City Centre and Inner Zones: 7% City Centre, 7% Inner, 15% Outer South, 35% Outer North

Space Standards H9

Against a baseline of not having a policy at all,

Alternatives

- i) Application of the NDSS to all dwellings with student housing exemption
- ii) Not introducing the standards at all

Access Standards H10

Against a baseline of not having a policy at all,

Alternatives

- i) Medium provision (percentages of dwellings): 30% for M4(2) and 2% for M4(3) done
- ii) High provision (percentages of dwellings): 40% for M4(2) and 5% for M4(3) done
- iii) Low provision (percentages of dwellings): 15% for M4(2) and 1% for M4(3)
- iv) Test not introducing the standards at all

Green Space G4

Against a baseline of not having a policy at all, assuming that housing development will take place, but without a policy requirement for green space. Consider quantity of green space provision against population expectations of Policy G3 and absolute quantity of green space.

Alternatives

- i) A green space requirement of 80sqm with policy guidance of Core Strategy 2014
- ii) A green space requirement of 40sqm / dwelling with choice of provision responsiveness
- iii) A green space requirement of average 40sqm / dwellings applied according to size of dwelling (by bedroom) with choice of provision responsiveness
- iv) Not having a green space policy for new dwellings

Policy EN1: Climate Change CO2 Reduction

The SA will only score the changes which affect major residential development. The part of the policy concerning non-residential development is not proposed to be changed and was scored in the original Core Strategy, so is not being scored here.

Against a baseline of not having a policy at all
Alternatives

- i) Retaining the “where feasible” requirement to provide a minimum of 10% of the predicted energy needs of major development from renewable or low carbon energy
- ii) Deleting the residential elements of the policy

Policy EN2: Sustainable Design and Construction

The SA will only score the changes which affect major residential development. The part of the policy concerning non-residential development is not proposed to be changed and was scored in the original Core Strategy, so is not being scored here.

Against a baseline of not having a policy at all,
Alternatives

- i) Retaining the “where feasible” requirements for residential development to meet a water standard of 110 litres per person per day
- ii) Deleting the residential elements of the policy and relying on the lower water standard of Building Regulations

Policy EN8: Electric Vehicle Charging Points

Against a baseline of not having a policy at all,
Alternatives

- i) Requiring residential development to provide 1 point per dwelling and non-residential development providing 10% of spaces with points, and infrastructure to add more at a later date
- ii) Not introducing the policy at all

7. Sustainability Appraisal Results

- 7.1. The scores are set out in Appendix 2. Possible scores range from a major positive effect (++) , minor positive (+), neutral (N), minor negative (-) to major negative (--).

8. SUMMARY OF SIGNIFICANT AND CUMULATIVE EFFECTS OF THE CSSR

8.1. The Housing Requirement

- 8.1.1. Four policy alternatives have been scored:

- i. Low housing requirement at 42,384 (the CLG consultation figure)

- ii. Mid-range housing requirement 51,952
- iii. Mid-range housing requirement 55,648
- iv. High housing requirement at 60,528 (SHMA 2017 High Growth Scenario)

- 8.1.2. The Low housing scenario of 42,384 dwellings was scored as the baseline. Without a policy, this would be the default requirement. Consequently, most of the effects scored as neutral, although in real terms could be regarded as negatives. There are transport negatives of proposing a housing requirement which is considered insufficient to support the employment growth forecast in the Regional Econometric Model (REM) of March 2017 and therefore drawing in additional commuting from outside of the district. There are consequent negatives for air quality and health. There are no positives.
- 8.1.3. The two mid-range scenarios of 51,952 and 55,648 dwellings score positively against the economic objectives, largely because the quantity of dwellings would be consistent with the REM forecast of employment growth. They also score positively for provision of housing. They have negatives for a number of environmental objectives which would necessitate policy interventions to mitigate impacts. For example, green space, design and environmental safeguarding policies.
- 8.1.4. The high growth scenario of 60,528 dwellings also scores positively for economic and housing objectives and scores negatively for a number of environmental objectives. It scores double negative for "Efficient and Prudent Use of Land" which reflects the increased level of Green Belt land take over and above the mid-range scenarios.

8.2. Housing Distribution

- 8.2.1. Two policy options were scored: i) retaining a distribution for Housing Market Characteristic Areas (HMCAs) and ii) deleting the existing policy entirely. The option of retaining distribution by geographical areas of the Settlement Hierarchy was not considered realistic because of the inability to differentiate between in-settlement and extensions to settlement development.
- 8.2.2. The option of retaining a distribution for HMCAs scored positively for employment (SA1) and business investment (SA2), housing (SA6) and social inclusion (SA7). This was based on the positives of a broader distribution of housing site opportunities enabling the market to deliver the full requirement of housing, and consequently being able to deliver more affordable housing and a better housing mix. It had double negatives of efficient use of land (SA9), climate change adaption (SA12) and flood risk (SA13) because more Green Belt land will be required and sites with higher flood risk in the city centre will be justified. There were single negatives concerning transport (SA14), air quality (SA17) and landscape (SA21). This was on account of the expectation that more housing sites would need to be found in urban fringe areas which would be less easy to serve by public transport and this could be negative for air quality. It also presumes there may need to be some development affecting Special Landscape Areas.

8.2.3. The option of having no distribution policy only resulted in three positive effects on business investment (SA2), climate change mitigation (SA11) and transport (SA14) based on the expectation of greater use of public transport from less housing being accepted in outer areas. A consequence of such housing distribution is that people are able to get to work more easily boosting business investment. However, without the ability to plan for a broader distribution of housing there were a large number of negative effects. With fewer market areas having housing opportunities this approach was expected to fail in achieving full provision of housing (SA6), and consequently deliver less affordable housing particularly in outer areas would adversely affect social inclusion (SA7). Fewer residential developments in outer areas was considered likely to mean less opportunity to provide green space and green infrastructure in areas where it is normally feasible creating negative effects for green space (SA8) and biodiversity (SA10). The expectation that no policy would see a greater concentration of housing development in inner areas would also have negative effects on air quality (SA17) and amenity (SA20). Whilst having a distribution policy may lead to more land of high flood risk being developed for housing, the option of not having a distribution policy would still be likely to see pressure for housing development on land of high flood risk in the inner areas and city centre, so this scores as a single negative for flood risk (SA13).

8.3. **Affordable Housing**

8.3.1. Three alternative policy approaches were scored initially. A fourth alternative was scored after an Economic Viability Assessment update concluded that there was scope to raise targets for the City Centre and Inner zones:

- i. Maintain existing % targets for 4 geographic zones: 5% City Centre, 5% Inner, 15% Outer South, 35% Outer North
- ii. Halve the current AH targets: 2.5% for City Centre and Inner. 7.5% for Outer South; 17.5% for Outer North
- iii. Increase the existing targets by 5% for each zone: 10% City Centre, 10% Inner, 20% Outer South, 40% Outer North
- iv. Increase the existing targets by 2% for City Centre and Inner Zones: 7% City Centre, 7% Inner, 15% Outer South, 35% Outer North

8.3.2. All three options were found to have many neutral effects, particularly concerning the environmental SA objectives. However, critical differences were apparent concerning a small number of SA objectives.

8.3.3. Option i) scored double positive for its effect on housing (SA6) and a single positive for social inclusion (SA7). This is because the moderate requirement for affordable housing was considered to enable provision of market housing and a good mix of housing sizes and types. Also, the moderate provision of affordable housing would contribute to social inclusion. All other effects were neutral.

- 8.3.4. Option ii) scored single positives for housing (SA6) and social inclusion (SA7) on the basis that a lower affordable housing target would have the same effects as Option i) but not so pronounced. All other effects were neutral.
- 8.3.5. Option iii) also scored single positives for housing (SA6) and social inclusion (SA7) but for different reasons. The strong positives of greater affordable provision and social inclusion were partly diluted by reductions to the deliverability of market housing. There were also single negative effects on the employment objective (SA1) because of an anticipated small reduction in housing construction jobs as a consequence of reduced market housing development. The SA objectives of landscape (SA21) and historic environment (SA22) were also negatively affected on the assumption that high affordable housing requirements could render historic building restoration projects unviable.
- 8.3.6. Option iv) scored the same as Option i). This is because both these options were scored on the basis that the optimum amount of affordable housing is deliverable, without undermining deliverability of market housing.

8.4. **Policy H9: Housing Space Standards**

- 8.4.1. Two policy options were scored including application of the NDSS to all dwellings (with student housing exemption) and the option of not introducing the standards at all. Both options had mostly neutral effects. The policy of applying minimum space standards scored positively for health (SA3), housing (SA6) and social inclusion (SA7). The option of not introducing the policy scored neutral against all of the SA objectives.

8.5. **Policy H10: Housing Access Standards**

- 8.5.1. Four policy alternatives were scored:
- i. Medium provision (percentages of dwellings): 30% for M4(2) and 2% for M4(3)
 - ii. High provision (percentages of dwellings): 40% for M4(2) and 5% for M4(3)
 - iii. Low provision (percentages of dwellings): 15% for M4(2) and 1% for M4(3)
 - iv. Test not introducing the standards at all
- 8.5.2. Options i) of medium provision and ii) of high provision both scored double positive against the SA objectives of health (SA3) and social inclusion (SA7) and a single positive for housing (SA6). They also both had single negative effects on employment (SA1) and historic environment (SA22). It was considered that the high provision would have more serious impacts on employment and historic environment because of the impact on viability and deliverability, but the effects were marginal, and not significant enough to warrant double negative scores.

8.5.3. Option iii) of low provision affected the same SA objectives as options i) and ii), but the positives for health (SA3) and social inclusion (SA7) only warranted single rather than double positives.

8.5.4. Option iv) of not having a policy scored neutral against all SA objectives.

8.6. **Policy G4: Green Space**

8.6.1. Four alternative policy approaches for G4 were scored: i) Not having a green space policy for new dwellings ii) A requirement of 80sqm / dwelling (current policy) iii) A green space requirement of 40sqm / dwelling with choice of provision responsiveness and iv) A green space requirement of 40sqm / dwellings applied according to size of dwelling (by bedroom) with choice of provision responsiveness.

8.6.2. The SA for option (i) 'Not having a green space policy for new dwellings' had no positive benefits. It was seen to have a negative impact on 8 SA objectives for the reason of the residents of new dwellings putting an increased burden per capita on existing Green Space: SA3 (Health), SA5 (Culture), SA7 (Social inclusion & community cohesion), SA8 (Green Space, sports and recreation), SA10 (Biodiversity & geodiversity), SA12 (Climate change adaption), SA17 (Air quality) and SA21 (landscape & townscape quality)

8.6.3. Option (ii) 'SA of G4 with a requirement of 80sqm / dwelling (current policy)' was assessed on the presumption that the 80sqm per dwelling would be achieved in line with the Core Strategy and not factor in any implementation and delivery difficulties.

8.6.4. In general this approach returned the most 'positive' scores in the SA. It was seen to have more positive impacts (when compared to the alternatives). In particular it scored highly against objectives SA8 (Green Space, sports and recreation), SA17 (Air quality) and SA21 (Landscape & Townscape quality). However, it scored less well when compared to Policy options iii) and iv). The inability to easily direct Green Space provision to identified deficiencies in an area using this approach was a negative for objective SA7 (Social inclusion & community cohesion). Whilst a positive outcome was recorded the approach was not as positive as options iii) and iv). The policy was also seen as an inhibitor to high density residential development and therefore scored very poorly in comparison to options iii) and iv) for objective SA9 (Efficient and prudent use of land).

8.6.5. Policy approaches (iii) and (iv) scored identically in the SA. In comparison to policy option ii (80sqm by dwelling), both iii and iv had more positive impacts on SA objective SA2 (Business investment / economic growth) in a sustainable manner by promoting an increases in the proportion of journeys by non-car modes and increases in walking and cycling journeys. However both had negative impacts on objective SA17 (Air Quality) and SA21 (Landscape and townscape amenity).

8.7. Policy EN1: Climate Change CO2 Reduction

- 8.7.1. Two alternative policy approaches were scored: i) retaining the minimum requirement of 10% of energy needs from renewables/low carbon sources, ii) deleting the residential elements of the policy.
- 8.7.2. The policy option of retaining the minimum requirement of 10% of energy needs from renewables/low carbon sources scored very positively against the SA objectives. There would be some advantages to business investment (SA2) as a result of technological innovation and there would be double positives for health (SA3) deriving from improved quality of housing, improvements to air quality and increased energy efficiency of domestic buildings. There would be a double positive effect towards housing (SA6) also derived from improved quality of housing. The positive effects on health and housing also contributed toward social inclusion and community cohesion (SA7).
- 8.7.3. The 10% energy option also scored very positively for climate change mitigation (SA11) which derives from the expected reduction in greenhouse gas emissions from buildings. There were also double positive effects toward air quality (SA17) and energy and resource efficiency (SA23). All other effects were neutral; there were no negative effects.
- 8.7.4. The effect of the policy option of deleting the residential elements of Policy EN1 produced a number of negative effects on SA objectives. Health (SA3), social inclusion (SA7), climate change mitigation (SA11) and energy and resource efficiency (SA23) all scored with a single negative. There were no neutral effects.

8.8. Policy EN2: Sustainable Design and Construction

- 8.8.1. Two alternative policy approaches were scored: i) retaining the minimum requirement for residential development to meet a maximum water standard of 110 litres per person per day, ii) deleting the residential elements of the policy and relying on the lower water standard (125 litres) of the Building Regulations.
- 8.8.2. The policy option of a water standard of 110 litres per person per day scored positively against SA objectives of business investment (SA2), health (SA3), housing (SA6), social inclusion (SA7) and water quality (SA8), and scored with a double positive against the objective of energy and resource efficiency (SA23). These positives were derived from anticipated improvements in technical innovation, quality standards of housing and improvements to the quality of water bodies. A double positive was registered for the impact on energy and resource efficiency (SA23) which is generated from expected increases in the water efficiency of new buildings.
- 8.8.3. The policy option of deleting the residential elements of the policy scored neutral against almost all of the SA objectives. It scored negatively against the objective for energy and resource efficiency (SA23) because it will fail to increase the water efficiency of new buildings.

8.9. **Policy EN8: Electric Vehicle Charging Points**

- 8.9.1. Two alternative policy approaches were appraised: i) requiring residential development to provide 1 point per dwelling and non-residential development to provide 10% of car parking spaces with points, ii) not introducing the policy at all.
- 8.9.2. The policy option of requiring provision of charging points scored positively against a wide range of SA objectives. It was considered that the policy would encourage technical innovation which generated a positive for business investment / economic growth (SA2). It would also impact positively on health (SA3) and housing (SA6) by promoting a safe local environment and improving the quality / standard of housing. It would assist climate change mitigation (SA11) by helping to reduce greenhouse gas emissions. The policy scored positively against the transport network objective (SA14) based on a double positive score for improving the environment for non-car users, offset by the negative of electric cars causing transport related accidents. The policy scored double positives for air quality (SA17) and amenity (SA20) based on expected reductions in noise and odour pollution. The policy also scored positively for energy and resource efficiency (SA23). However the policy scored negatively against the SA objectives to promote landscape and townscape quality (SA21) and the historic environment (SA22) because the appearance of charging points could be damaging to attractive visual and historic environments.
- 8.9.3. The option of no policy had a number of negative effects, some neutral effects and no positive effects. It scored negatively against objectives for health (SA3), housing (SA6), social inclusion (SA7), transport network (SA14), air quality (SA17) and amenity (SA20).

8.10. **Cumulative Effects**

- 8.10.1. Most of the policy proposals concern policy areas that are unrelated in their immediate effects, although the following relationships are recognised and appraised below.

The Housing Requirement, Affordable Housing, Housing Standards and Green Space

- 8.10.2. There is a relationship between the housing requirement, affordable housing and housing standards. The higher the housing requirement the more potential there will be to provide affordable housing, housing built to NDSS minimum space standards and accessible homes. As can be seen in Appendix 7, the scoring of the housing requirement options of Policy SP6 already has positive scores for the options of higher housing numbers against the SA objectives of housing (SA6) and social inclusion (SA7). This reflects the cumulative effect of higher housing numbers (options 2, 3 and 4) on affordable housing provision and on provision of accessible housing which in turn has positive effects on social inclusion.

- 8.10.3. There is also a relationship between the housing requirement and green space policies in that the options of higher housing numbers (options 2, 3 and 4) were considered to increase the burden on existing green spaces through increased use by higher numbers of residents. Recognition of this negative effect through the SA process generates a stronger need to have appropriate green space policy to secure provision of green space / or improvements to existing green spaces as mitigation for the effects of new housing.

Climate Change CO2 Reduction (Policy EN1) and Sustainable Construction (Policy EN2)

- 8.10.4. These policies have similar intentions concerning the overall environmental sustainability of new development. It is the residential development aspects of the policies that are being reduced in accordance with the Written Ministerial Statement of March 2015 leaving the policies to control only use of renewable energy (EN1) and use of water (EN2). The two proposed policy changes (EN1 and EN2) score very similarly against the SA objectives. In most cases the policies will be mutually reinforcing, but not enough to increase any of the individual scores.

Development Viability

- 8.10.5. Development viability unites many of the proposed policy effects. A combination of the policy requirements for affordable housing, green space, space standards, accessible housing, CO2 reduction, sustainable construction and electric vehicle charging points will impact on the viability of new housing development. This has been robustly assessed through the Economic Viability Study Update 2018 with the intention that policies be introduced so that, cumulatively, their effect does not render typical residential development unviable.

9. Negative Effects and Possible Mitigation

9.1. SA01 – Employment

- 9.1.1. The policy requiring accessible dwellings (H10) scored negatively for employment on the assumption that the larger dwellings, particularly M4(3) types, will affect the cost of housing development, which in turn could reduce development and reduce jobs. Similarly, the policy requirement for affordable housing (H5) produced a similar effect. The impacts of these policies have been viability tested to mitigate the effects.

9.2. SA02 – Business Investment / Economic Growth

- 9.2.1. None of the policy alternatives score negative against this objective.

9.3. SA03 – Health

- 9.3.1. The “have no policy” options for Policies EN1, EN8 and G4 scored negatively on the SA health objective. It was considered that with the forecast population growth in Leeds, unless there is to be commensurate increases in carbon reduction, in electric vehicle charging points and in green space, the impact on health would be negative. There is no obvious means of mitigation.
- 9.3.2. All four alternatives of Policy SP6 scored negatively on health. The low housing requirement scored negatively because a failure to build enough dwellings to keep up with forecast employment growth means greater commuting from neighbouring local authorities and greater air pollution and loss of amenity as a result. Mitigation could include better public transport, but this may not be feasible because of cost.
- 9.3.3. The three higher housing requirements scored negatively because of increasing population demands on facilities such as green space and other environmental resources. Mitigation is possible by introducing planning policies that safeguard environmental resources and seek provision of additional green space to serve the growing population.
- 9.3.4. The policy option for Policy SP7 of maintaining a distribution of housing amongst Housing Market Characteristic Areas (HMCAs) scored negatively on health because of danger of harming environmental designations in outer areas and less opportunity for public transport use in outer areas. This may be mitigated by selecting housing sites in the outer areas that will not have adverse impacts on environmental resources and have public transport opportunity. Policies to insist on “travel planning” can also help. Site development can also be planned to avoid harm to environmental resources, and even make enhancements as appropriate.

9.4. SA04 – Crime

- 9.4.1. None of the policy alternatives scored negatively against this objective.

9.5. SA05 Culture

- 9.5.1. Only the Policy G4 alternative of not having a green space policy requirement scored negative against this objective. Green space can often provide opportunity for cultural events etc. There is no obvious means of mitigation.

9.6. SA06 – Housing

- 9.6.1. The alternative of not having a policy requiring electric vehicle charging points (Policy EN8) scores negatively for housing. The standard of housing quality will be diminished by not making provision for the charging of electric vehicles that are expected to become more mainstream over coming decades. There is no obvious means of mitigation.

- 9.6.2. Concerning the green space policy (G4), the three alternatives that require green space provision all scored negatively on the housing SA objective. The requirement for green space can affect viability and deliverability of housing, which underlines the importance of viability testing the policy alternatives to ensure that housing development is not unduly undermined.
- 9.6.3. The policy alternative of not setting a framework for the geographical distribution of new housing scored negatively on the housing SA objective. It was considered that, without ensuring balanced provision of site opportunities, the market would be constrained and be unable to deliver the housing requirement. There is no obvious means of mitigation.

9.7. SA07 – Social Inclusion and Community Cohesion

- 9.7.1. The “have no policy” options for Policies EN1, EN8 and G4 scored negatively on the SA social inclusion objective. Without better energy efficiency of homes, they could become less affordable. Without electric vehicle charging points communities are likely to suffer the adverse impacts of noise and poor air quality for longer. Without provision of green space there will be limited opportunities for sport and other communal recreational activities. There is no obvious means of mitigation.
- 9.7.2. The policy options of the low housing requirement to Policy SP6 and not having a distributional arrangement in Policy SP7 both scored negatively on the social inclusion objective. A low level of housing provision would reduce opportunities for affordable and mixed types of housing, working against the objective of social inclusion. There is no obvious means of mitigation.

9.8. SA08 – Green space, Sports and Recreation

- 9.8.1. The option of not having a policy requiring provision of green space in new residential development scored negatively against SA08. There is no obvious means of mitigation.
- 9.8.2. The three higher housing requirement options of Policy SP6 scored negatively against objective SA08. This underlines the need for green space requirement policy to deliver the green space that is needed by a growing population.
- 9.8.3. The policy alternative of not setting a framework for the geographical distribution of new housing scored negatively on the green space SA objective. It was considered that, without ensuring balanced provision of site opportunities, opportunities for green space provision on the most opportune low density sites could be lost. There is no obvious means of mitigation.

9.9. SA09 – Efficient and Prudent Use of Land

- 9.9.1. The three green space options of Policy G4 that require green space provision scored negatively against SA09. These policy options were considered to be inhibitive of high density residential development. Mitigation is possible by ensuring that green space policy is applied

responsively to different site circumstances, including acceptance of commuted sums in lieu of on-site provision where appropriate higher density developments would be jeopardised by on-site green space requirements.

- 9.9.2. The three higher housing requirement options of Policy SP6 scored negatively against objective SA09. Both alternatives of Policy SP7 concerning housing distribution also scored negatively. All these policy options involve some level of Green Belt development. It cannot be mitigated against without town cramming as the alternative.

9.10. SA10 – Biodiversity and Geodiversity

- 9.10.1. The option of not having a policy requiring provision of green space in new residential development scored negatively against SA10. There is no obvious means of mitigation.
- 9.10.2. The three higher housing requirement options of Policy SP6 scored negatively against objective SA10. Both alternatives of Policy SP7 concerning housing distribution also scored negatively. It was anticipated that all these policy options carry potential to harm interests of biodiversity and geodiversity importance. This underlines the need for appropriate policy protection and for sites to be identified carefully to safeguard biodiversity and geodiversity importance.

9.11. SA11 – Climate Change Mitigation

- 9.11.1. The “have no policy” option for Policy EN1 scores negatively on SA objective SA11. It would fail to make optimum reductions in CO2 emissions as part of residential development. There is no obvious means of mitigation.
- 9.11.2. The three higher housing requirement options of Policy SP6 scored negatively against objective SA11. Greater housing provision (above the baseline of 42,384) brings negatives in terms of climate change. An appropriate policy response would be to optimise the credentials of new housing in reducing greenhouse gas emissions.

9.12. SA12 Climate Change Adaption

- 9.12.1. The option of not having a policy requiring provision of green space in new residential development scored negatively against SA12. Green space is an opportunity for trees and vegetation that dampen climate change effects. Without green space provision there is no obvious means of mitigation.
- 9.12.2. The three higher housing requirement options of Policy SP6 scored negatively against objective SA12. Both alternatives of Policy SP7 concerning housing distribution also scored negatively. It was anticipated that all these policy options could worsen ability to adapt to climate change. This underlines the need for appropriate policy interventions in association with new housing development.

9.13. SA13 Flood Risk

- 9.13.1. The three higher housing requirement options of Policy SP6 scored negatively against objective SA13. Both alternatives of Policy SP7 concerning housing distribution also scored negatively, with the distribution requirement scoring as a double negative. It was anticipated that all these policy options could lead to development in areas of high flood risk. There is no easy solution to this because there are other very strong sustainability advantages of building on land of high flood risk in the city centre and inner urban areas. Such land is highly accessible to employment and supporting infrastructure and tends to avoid negative impacts on landscape and other environmental resources.

9.14. SA14 Transport Network Infrastructure

- 9.14.1. The option of not having an electric vehicle charging point (EVCP) policy was scored negatively against SA objective SA14. EVCPs offer a contributory dimension to transport network infrastructure. There is no obvious means of mitigation.
- 9.14.2. The low housing requirement of Policy SP7 also scored negatively on SA14. This is on the basis that a shortfall of housing against employment growth will drive up in-commuting from outside Leeds district, putting pressure on network infrastructure. Mitigation could include better public transport, but this may not be feasible because of cost.

9.15. SA15 Accessibility to Employment, Services and Facilities

- 9.15.1. The three higher housing requirement options of Policy SP6 scored negatively against objective SA15. Having to find higher levels of housing land means it is more difficult to accommodate all new housing in highly accessible locations. Mitigation measures would include giving priority in site selection to locations with the best accessibility and requiring housing developments to agree Travel Plans.

9.16. SA16 Waste

- 9.16.1. The three higher housing requirement options of Policy SP6 scored negatively against objective SA15. Having to find higher levels of housing land inevitably means more domestic waste will be generated. Mitigation would be possible by planning individual developments to allow for recycling and easy and effective collection of waste.

9.17. SA17 Air Quality

- 9.17.1. The “have no policy” options for Policies EN8 and G4 scored negatively on the SA air quality objective. It was considered that with the forecast population growth in Leeds, unless there is to be commensurate increases in

electric vehicle charging points and in green space, the impact on health would be negative. There is no obvious means of mitigation.

- 9.17.2. The low housing requirement scored negatively on the assumption that more development would be concentrated in urban areas where it is difficult to avoid zones of low air quality. Mitigation would involve giving priority to locations with better air quality.
- 9.17.3. Both policy options for distribution of housing (Policy SP7) scored negatively against air quality. They both would lead to more housing development in the inner urban areas that tend to suffer the worst air quality. However, a policy that favoured development outside of the inner urban areas would be unsustainable for many other reasons, particularly accessibility, making efficient use of land and impacts on environmental resources.

9.18. SA18 Water Quality

- 9.18.1. None of the policy alternatives scored negatively against this objective.

9.19. SA19 Land and Soils Quality

- 9.19.1. None of the policy alternatives scored negatively against this objective.

9.20. SA20 Amenity

- 9.20.1. The option of not having an electric vehicle charging point (EVCP) policy scored negatively against SA objective SA20. EVCPs will support the growth of electric vehicles in place of vehicles powered by petrol and diesel engines. Without provision of EVCPs the use of petrol and diesel engines is likely to persist for longer with consequent negative effects on amenity in terms of noise, smells and pollution. There is no obvious means of mitigation.
- 9.20.2. The three higher housing requirement options of Policy SP6 scored negatively against objective SA20. Having to find higher levels of housing land inevitably means more car journeys will be generated with consequent negative effects on amenity in terms of noise, smells and pollution. Mitigation measures would include giving priority in site selection to locations with the best accessibility and requiring housing developments to agree Travel Plans.

9.21. SA21 Landscape and Townscape Quality

- 9.21.1. The policy option of requiring electric vehicle charging points (EVCPs) in new development (Policy EN8) scored negatively against SA21. EVCPs could appear alien and inappropriate to valued townscape. Therefore, there is a case for policy advice to ensure EVCPs are appropriately sited and designed where surroundings are sensitive.

- 9.21.2. Not having a green space policy (Policy G4) also scored negatively against SA21 because provision of space is often necessary to safeguard the setting of attractive buildings and townscape. Other design and conservation policies can help mitigate such negative effects.
- 9.21.3. The policy option of requiring the highest provision of affordable dwellings (H10) scored negatively against SA21 on the assumption that a higher affordable housing requirement will challenge the viability of housing development, which in turn could limit resources for good design and conservation. The impacts of this policy needs to be viability tested to mitigate the effects
- 9.21.4. The three higher housing requirement options of Policy SP6 scored negatively against objective SA21. Also, the option of setting a housing distribution for local areas of Leeds (Policy SP7) scored negatively. Higher housing requirements mean pressure to accommodate housing in locations and ways that may not always safeguard landscape and townscape quality. The option of planning the distribution of housing means that the landscape of outer areas may be negatively affected. Appropriate choices of site selection and other design and conservation policies can help mitigate such negative effects.

9.22. SA22 Historic Environment

- 9.22.1. The policy option of requiring electric vehicle charging points (EVCPs) in new development (Policy EN8) scored negatively against SA22. EVCPs could appear alien and inappropriate to historic buildings. Therefore, there is a case for policy advice to ensure EVCPs are appropriately sited and designed where surroundings are sensitive.
- 9.22.2. All three policy options of introducing accessible housing standards (Policy H10) score negatively against SA22. The physical requirements of the standards could be harmful to historic character in the case of conversions of history buildings. Other design and conservation policies can help mitigate such negative effects, but writing in policy considerations about the importance of historic buildings to the supporting text of Policy H10 could provide further safeguard.
- 9.22.3. The policy option of requiring the highest provision of affordable dwellings (H10) scored negatively against SA22 on the assumption that a higher affordable housing requirement will challenge the viability of housing development, which in turn could limit resources for good design and conservation. The impacts of this policy needs to be viability tested to mitigate the effects.

9.23. SA23 Energy and Resource Efficiency

- 9.23.1. The policy options to delete policies to require higher CO2 reductions (Policy EN1) and lower use of water (Policy EN2) for residential development scored negatively against SA23. There are no obvious means of mitigation.

Appendix 1: Decision Making Criteria

SA OBJECTIVES	DECISION-MAKING CRITERIA		INDICATORS
SA1 EMPLOYMENT	DM01	Create more jobs (permanent and temporary)	BCP: 10, 11, 14, 15, 18, 19 AMR: 2, 3, 11, 15, 16, 17, 18, 19, 23, 32, 33, 34, 36
	DM02	Improve physical access to jobs (transport)	
	DM03	Improve skills & access to training	
SA2 BUSINESS INVESTMENT / ECONOMIC GROWTH	DM02	Improve physical access to jobs (transport)	BCP: 13 AMR: 2, 3, 11, 15, 16, 17, 18, 19, 20, 21, 22, 23, 31, 34, 40
	DM04	Promote economic development: <ul style="list-style-type: none"> - Offices, industry & distribution - Retail & commercial leisure - Tourism & culture - Energy sector - Minerals & waste sectors - Health & education sectors - Transport & physical infrastructure - Housebuilding & other residential sectors 	
	DM05	Increase/maintain vibrancy of centres	
	DM06	Promote improved ICT networks & technological innovation	
	DM07	Promote growth & diversity of rural economy	
SA3 HEALTH	DM02	Improve physical access to jobs (transport)	BCP: 4, 5, 10, 11, 14 16 & 18 AMR: 23, 24, 25, 31, 32, 33, 34, 35, 36, 38
	DM03	Improve skills & access to training	
	DM08	Encourage people to take more physical exercise	
	DM09	Safe local environment	
	DM10	Increase/maintain access to fresh food	
	DM19	Improve quality/standard of housing	
	DM37	Increase provision of and access to green infrastructure	
	DM50	Appropriate provision of key services and facilities (schools, health facilities, retail & commercial leisure)	
	DM51c	Increase/maintain access to health facilities	
	DM54	Avoid exposure to poor air quality	

SA OBJECTIVES	DECISION-MAKING CRITERIA		INDICATORS
	DM55	Impact of policy/proposal on air quality	
	DM71a	Increase energy efficiency of housing and reduce energy bills & fuel poverty	
SA4 CRIME	DM11	Reduce crime / fear of crime	BCP: 3
SA5 CULTURE	DM04c	Development of tourism and cultural facilities (hotels, museums, galleries, theatres etc)	BCP: 20 AMR: 2, 20, 31
	DM12	Increase/maintain arts facilities	
	DM13	Increase/maintain community facilities inc. religious buildings	
	DM14	Promotes sports, entertainment and cultural events	
	DM15	Supports further and higher education sectors	
	DM16	Promotes creative industries	
SA6 HOUSING	DM17	Meet housing delivery targets	BCP: 15, 16 AMR: 3, 4, 4A, 5, 6, 7, 8, 9, 9a, 10, 11, 12, 13 & 14
	DM18	Provide appropriate mix of housing types & sizes <ul style="list-style-type: none"> - Affordable housing - Size of dwellings - Specialist needs (older people / independent living) 	
	DM19	Improve quality/standard of housing	
SA7 SOCIAL INCLUSION & COMMUNITY COHESION	DM02	Improve physical access to jobs (transport)	BCP: 10, 12, 16, 18 AMR: 4A, 9, 10, 11, 12, 13, 18, 21, 22, 23, 24, 29, 30, 32, 33, 34, 36 National Indices of Deprivation (IoD)
	DM09	Safe local environment	
	DM20	Provide services & facilities appropriate for the needs of BME groups, older people, young people and disabled people	
	DM21	Reduce overall levels of economic & social deprivation	
	DM22	Reduce disparities in levels of economic and social deprivation	
	DM23	Create opportunities for people from different communities to have increased contact with each other	
	DM51	Increase/maintain accessibility to employment and key services & facilities (centres/food store; schools & health facilities)	
SA8 GREEN SPACE,	DM24	Increase/maintain quantity of greenspace	BCP: 4

SA OBJECTIVES	DECISION-MAKING CRITERIA		INDICATORS
SPORTS & RECREATION	DM25	Increase/maintain indoor and outdoor sports facilities	AMR: 23, 24, 25 & 31
	DM26	Increase quality of green space	
	DM27	Improve accessibility to greenspace	
	DM28	Increase/maintain the public rights of way network	
SA9 EFFICIENT & PRUDENT USE OF LAND	DM29	Promote brownfield development and minimise	AMR: 5, 8
	DM30	Promote higher density development	
	DM31	Minimise loss of Green Belt land	
	DM32	Minimise loss of high quality agricultural land	
	DM33	Prevent unacceptable risk from land instability	
SA10 BIODIVERSITY & GEODIVERSITY	DM34	Protect & enhance existing habitats including long term management	AMR: 23, 24, 25, 31, 37, 38
	DM35	Protect & enhance protected & important species	
	DM36	Protect & enhance internationally, nationally and locally designated nature conservation sites	
	DM37	Increase green infrastructure provision	
	DM38	Protect sites of geological interest	
SA11 CLIMATE CHANGE MITIGATION (GREENHOUSE GAS EMISSIONS)	DM39	Reduce greenhouse gas emissions from transport	BCP: 16, 18 & 19 AMR: 32, 33, 34, 35, 36, 42
	DM40	Reduce greenhouse gas emissions from buildings	
	DM41	Reduce greenhouse gas emissions from energy generation & distribution	
SA12 CLIMATE CHANGE ADAPTATION	DM37	Increase green infrastructure provision	AMR: 23, 24, 25, 31, 38, 39, 40
	DM42	Prepare for likelihood of increased flooding	
	DM76	Build capacity for biodiversity to adapt to climate change	
SA13 FLOOD RISK	DM43	Reduce risk of flooding from rivers	AMR: 23, 24, 38, 39, 40
	DM44	Reduce risk of surface water flooding	
SA14 TRANSPORT	DM45	Increase proportion of journeys by non-car modes	BCP: 18 & 19

SA OBJECTIVES	DECISION-MAKING CRITERIA		INDICATORS
NETWORK (INFRASTRUCTURE)	DM46	Ease congestion on road network	AMR: 23, 32, 33, 34, 35, 36
	DM47	Make environment more attractive for non-car users	
	DM48	Encourage freight transfer from road to rail/water	
	DM49	Reduce transport-related accidents	
SA15 ACCESSIBILITY TO EMPLOYMENT, SERVICES & FACILITIES	DM02	Improve physical access to jobs (transport)	BCP: 18 & 19 AMR: 19, 20, 21, 22, 23, 32, 33, 34, 36
	DM50	Appropriate provision of key services and facilities (schools, health facilities, retail & commercial leisure)	
	DM51	Increase/maintain accessibility to key services & facilities (centres/food store; schools & health facilities)	
SA16 WASTE	DM52	Provide or safeguard facilities for waste management (storage at source; recycling, recovery; processing; disposal)	BCP: 17 AMR: 44 & 45
	DM53	Reduce waste sent to landfill (recycling & recovery)	
SA17 AIR QUALITY	DM54	Avoid exposure to poor air quality impacts on nature conservation sites	BCP: 6 AMR: 32, 33, 34, 35, 36, 38, 41
	DM55	Impact of policy/proposal on air quality	
	DM77	Reduce/avoid adverse air quality impact on nature conservation sites	
SA18 WATER QUALITY	DM56	Improve the quality of water bodies (rivers, streams, lakes and groundwater)	AMR: 39
	DM78	Reduce/avoid adverse water quality impacts on nature conservation sites	
SA19 LAND AND SOILS QUALITY	DM57	Promote remediation of contaminated land	AMR: 43
SA20 AMENITY	DM58	Reduce/avoid exposure to noise pollution	
	DM59	Reduce/avoid exposure to light pollution	
	DM60	Reduce/avoid exposure to odour nuisance	
	DM61	Avoid inappropriate development	

SA OBJECTIVES	DECISION-MAKING CRITERIA		INDICATORS
		within HSE Major Hazard Zones	
SA21 LANDSCAPE & TOWNSCAPE QUALITY	DM62	Maintain/enhance special landscape areas	AMR: 24, 25, 31, 37, 38
	DM63	Protect/enhance landscape features e.g. trees, hedgerows ponds, dry stone walls	
	DM64	Increase quality & quantity of woodland	
	DM65	Maintain/enhance landscape character of the area	
	DM66	Provide landscape features in new development	
	DM67	Ensure development in urban areas is appropriate to its setting	
	DM68	Encourage innovative and distinctive urban design	
SA22 HISTORIC ENVIRONMENT	DM69	Conserve and enhance designated and non-designated heritage assets and their setting: <ul style="list-style-type: none"> - Listed buildings - Conservation areas - Historic parks & gardens - Scheduled ancient monuments - Registered battlefields - Non-designated heritage assets (local list) 	AMR: 26, 27, 28
	DM70	Reduce number of heritage assets 'at risk'	
SA23 ENERGY & RESOURCE EFFICIENCY	DM71	Increase energy efficiency of buildings/development	BCP: 16 AMR: 23, 42, 43
	DM72	Increase water efficiency of buildings/development	
	DM73	Increase proportion of energy generated from renewable/low carbon sources	
	DM74	Promote low carbon energy distribution & storage e.g. heat networks	
	DM75	Safeguard land designated for minerals use and promote prior extraction	

Appendix 2 Sustainability Appraisal Score Table

Sustainability Appraisals of policies revised as part of the Core Strategy Review. Version @ 12/12/17

[illegible]

Sustainability Appraisals of policies revised as part of the Core Strategy Review. Version @ 12/12/17

Policy	Options	SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20	SA21	SA22	SA23
Policy H9	This scoring was based on application of the NDSS to all dwellings, with the exception of student accommodation	N	N	+	N	N	+	+	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Policy H9	Not introducing the standards at all	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Policy SP6	Baseline of 42,384 dwellings (DCLG Consultation Scenario)	N	N	-	N	N	N	-	N	N	N	N	N	N	-	N	N	-	N	N	N	N	N	N
Policy SP6	The mid-range housing requirements of 51,952 dwellings (SHMA Adjustment Scenario)	++	+	-	N	N	++	+	-	-	-	-	-	-	+	-	-	N	N	+	-	-	N	N
Policy SP6	The mid-range housing requirements of 55,648 dwellings (SHMA REM2017 Scenario)	++	+	-	N	N	++	+	-	-	-	-	-	-	+	-	-	N	N	+	-	-	N	N
Policy SP6	High housing requirement at 60,528 (SHMA 2017 High Growth Scenario)	++	+	-	N	N	++	+	-	-	-	-	-	-	+	-	-	N	N	+	-	-	N	N
Policy SP7	Scored on the basis that HMCA percentage targets are retained from the adopted 2014 Core Strategy, which ensures there will be balanced provision of housing delivery across the district	+	+	-	N	N	+	+	N	-	-	N	-	-	-	N	N	-	N	N	N	-	N	N
Policy SP7	Not having a distribution policy at all	N	+	N	N	N	-	-	-	-	-	+	-	-	+	N	N	-	N	N	-	N	N	N