



Leeds Site Allocations Plan

Leeds Local Plan

**SAP Remittal - Sustainability Appraisal Addendum &
Habitat Regulations Assessment Addendum**

Inspector's Further Proposed Main Modifications

Development Plan Document

December 2022

1. INTRODUCTION

- 1.1 This Addendum supplements the Sustainability Appraisal (SA) Addendum Submission Version (CDREM1/2, March 2021) which was provided to accompany the Council's proposed Main Modifications (MMs) to the Site Allocations Plan (SAP) Remittal. This Addendum also supplements the Habitats Regulations Assessment Addendum: Screening & Appropriate Assessment (CDREM1/5a, May 2021).
- 1.2 As part of the examination of the remitted part of the SAP (CDREM1/1) (with hearings from 14th -17th September 2021) the Inspector confirmed her preliminary Proposed Main Modifications to the SAP in November 2021, which were subject to a further SA Addendum (December 2021). That SA Addendum together with the Inspector's preliminary Proposed Main Modifications were subject to a 6 week consultation from 17th December 2021 to 28th January 2022¹.
- 1.3 Following the close of the consultation, the Inspector wrote to the Council on the 8 February 2022 seeking further clarification from the Council on several matters relating to the Integrated Rail Plan (IRP) for the North and Midlands and other matters raised by the consultation on the MMs. The Council provided a response to the Inspector's letter on 22 February, which included confirmation that the Council's position remained unchanged notwithstanding the IRP, that the employment land evidence demonstrated a need for further release of land and thus exceptional circumstances existed for Green Belt release of land at Barrowby Lane, Manston. The Inspector subsequently wrote to the Council on 25 March advising that a further hearing was necessary to consider the exceptional circumstances required to justify the permanent release of Green Belt land at Barrowby Lane and the uncertainty regarding the Safeguarding Directions. The hearing took place on 18 May.
- 1.4 Following the close of the hearing, the Inspector wrote to the Council on 8 November setting out her draft findings on the Barrowby Lane site (EG2-37) confirming that she was now minded to amend her preliminary findings on the basis that she did not accept the Council's case and considered that if alternative ways of bringing HS2 to Leeds were proposed there was the potential for employment sites covered by the Safeguarding Direction to be released within the plan period. She also confirmed that the draft proposed Main Modifications (MMs) relating to Barrowby Lane, Manston (namely MM10, MM19 and MM20) consulted on from December 2021 to January 2022 should be amended. The impact of this is to not allocate the site for employment use and that the land should remain as Green Belt.
- 1.5 In sum, the Council's submitted position was to seek allocation of the site at Barrowby Lane, Manston as an employment site (EG2-37). This site was

¹ <http://www.leeds.gov.uk/sapremittal>

originally allocated as a mixed use site in the adopted SAP (MX2-38) for both employment and housing. The Inspector’s preliminary MMs deleted the housing allocation at MX2-38 but retained the site as EG2-37. Now that position has changed the employment allocation at MX2-38 is also proposed to be deleted with a consequence that EG2-37 is no longer a proposed MM.

- 1.6 The purpose of this SA Addendum is to consider whether the deletion of Barrowby Lane, Manston as an employment allocation would result in the need for further Sustainability Appraisal or HRA. This SA and HRA Addendum sets out the Council’s conclusions on this.

2. SUSTAINABILITY APPRAISAL - ASSESSMENT OF EFFECTS

- 2.1 The SA Addendum Submission Version (March 2021) sets out the methodology and approach to undertaking the SA of the Remitted part of the SAP. This was based on the assessment of four reasonable options as set out in section 1.8 of that document, which identified different options to how the 37 Green Belt sites affected by the remittal could be considered. The 37 sites included the site at Barrowby Lane, Manston (proposed for mixed housing and employment site in the SAP). Option 2 proposed “*none of the 37 Green Belt sites as allocations in the SAP and retain them all as Green Belt*”, this option included a consideration of the effect of the site at Barrowby Lane being retained as Green Belt and not allocated for employment use. The results of the assessment of Option 2 are summarised at section 6 and provided at Appendix 4 of the SA Addendum Submission Version (March 2021).
- 2.2 The relevant extract from Section 6 is reproduced below which includes consideration of the loss of the employment allocation at Barrowby Lane. The full assessment table is provided at Appendix 1. The assessment has been amended to reflect the removal of the site as an employment allocation (21 hectares):-

Option 2 – Propose none of the 37 Green Belt sites as allocations in the SAP and retain them all as Green Belt

Table 6: Scoring of Option 2 against the SA Objectives

++	None
+	SA9 Efficient & prudent use of land SA10 Biodiversity & geodiversity SA13 Flood risk SA21 Landscape & townscape quality
0	SA2 Business investment / economic growth SA3 Health SA4 Crime SA5 Culture

	SA6 Housing SA7 Social inclusion & community cohesion SA11 Climate change mitigation SA12 Climate change adaptation SA14 Transport network SA15 Accessibility SA16 Waste SA17 Air quality SA18 Water quality SA19 Land & soils quality SA20 Amenity SA22 Historic Environment
-	SA1 Employment SA8 Green space, sports & recreation SA23 Energy & resource efficiency
--	None

- 2.3 This option has neutral effects for the majority of SA objectives reflecting the fact that the deletion of the allocation sites will not affect the majority of the objectives. There are 4 positive effects relating to environmental objectives (efficient & prudent use of land (SA9), biodiversity & geodiversity (SA10), flood risk (SA13) and landscape & townscape quality (SA21) as the Green Belt land will remain undeveloped.
- 2.4 There is a negative impact on employment (SA1) due to the loss of a 21 ha site for employment and the loss of jobs in the construction and employment sector. All other effects remain as in the original assessment of Option 2.
- 2.5 Apart from the short term negative effects arising from a reduction in the number of construction jobs in the housing development, the effects of this option are permanent.
- 2.6 The effects of this assessment across all 37 sites are cumulative having regard to the overall effect of the option.

3. SUSTAINABILITY APPRAISAL - CONCLUSIONS ON DELETION OF MM10, MM19 AND MM20

- 3.1 The effects of the deletion of the Barrowby Lane site as an employment allocation arising from MM10, MM19 and MM20 are detailed in Section 2 above. The principal effect of this is the negative effect on the SA objective relating to employment (SA1). Whilst there is a neutral effect overall in relation to business investment and economic growth (SA2) because the option assessment

considers all of the 37 remitted SAP sites as a whole, it is noted that there will be a negative effect on one of the decision making criteria informing SA2 (ie DM04 promote economic development) resulting from the loss of the employment allocation.

4. HABITAT REGULATIONS ASSESSMENT

4.1 An HRA Addendum CDREM1/5 (November 2020) was prepared to support and inform 37 MMs to the SAP as part of the Remittal process. These MMs were consulted on in January 2021 with the HRA as background.

4.2 Following the consultation on the SAP Remittal MMs and in light of a consultation response proposing to include the allocation of site MX2-38 as EG2-37 the Council's submission included an additional MM and a screening assessment was carried out for the additional proposed MM. This was reflected in an updated HRA (CDREM1/5a, May 2021). At the same time the update HRA also made reference to a revised legislative framework created by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 following a representation by Natural England.

4.3 In light of the above set out at paras 1.3 to 1.5 the Inspector is inclined to not accept this additional MM and further consultation on its removal is required. Its removal consists of three revised MMs. The effect of these three proposed revised MMs together with those already consulted on in January 2022 is that the SAP Remittal reverts to the position consulted on in January 2021 and as reported in the conclusions of the initial HRA (CDREM1/5) at that time. Namely that:

- the MMs will delete 4 sites in the 7km zone previously identified in the HRA where there is potential for Likely Significant Effects arising from additional recreational pressure on SPAs and SACs
- the MMs will have the effect of reducing any potential LSEs as a result of 475 fewer homes
- the existing HRA remains adequate and appropriate in addressing the reduced potential LSEs from the homes that remain in the Adopted SAP chiefly from the management of existing parks and green spaces

4.4 This conclusion has been reached by reference to the revised legislative framework created by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (noted). Namely:

- changes to the Habitats Regulations 2017 (published on 1 January 2021) by Department for Environment Food & Rural Affairs (DEFRA)
- changes by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

- recognition that SACs and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network.
- the 2019 Regulations have amended the above, to instead create a national site network. The national site network includes all existing SACs and SPAs. Therefore, any references to Natura 2000 in the Council's HRA now refers to the new national site network as protected under the amended 2017 Regulations

ASSESSMENT OF ALTERNATIVES

Appendix 1

Option 2: Propose none of the 37 Green Belt sites as allocations in the SAP and retain them all as Green Belt

SA1 - Employment	-	DM01 - Create more jobs	-	DM03 - Improve skills & access to training	N
	Notes	DM02 - Access to employment (transport)	N		
SA2 - Business investment / economic growth	N	DM02 - Access to employment (transport)	N	DM06 - Promote improved ICT networks & tech innovation	N
	Notes	DM04 - Promote economic development	-		
		DM05 - Increase / maintain vibrancy of centres	N	DM07 - Promote growth & diversity of rural economy	N
SA3 - Health	N	DM02 - Access to employment (transport)	N	DM37 - Increase green infrastructure provision	+
	Notes	DM03 - Improve skills & access to training	N	DM50 - Appropriate provision of key services & facilities	N
		DM08 - Encourage people to take more physical exercise	N	DM51c - Accessibility to health facilities (primary)	N
		DM09 - Safe local environment	N	DM54 - Avoid exposure to poor air quality	N
		DM10 - Increase / maintain access to fresh food	N	DM55 - Impact of policy / proposal on air quality	N
		DM19 - Improve quality / standard of housing	N	DM71a - Increase energy efficiency (domestic buildings)	-
SA4 - Crime	N	DM11 - Reduce crime rates / fear of crime	N	Notes	
SA5 - Culture	N	DM04c - Development of tourism & cultural facilities	N	DM14 - Promote sports, entertainment & cultural events	N
	Notes	DM12 - Increase / maintain arts facilities	N	DM15 - Supports further & higher education sectors	N
		DM13 - Increase / maintain community facilities	N	DM16 - Promote creative industries	N
SA6 - Housing	N	DM17 - Meet housing delivery targets	+	DM19 - Improve quality / standard of housing	N
	Notes	DM18 - Provide appropriate mix of housing types & sizes	-		
SA7 - Social inclusion & community cohesion	N	DM02 - Access to employment (transport)	N	DM22 - Reduce disparities in levels of economic & social deprivation	N
	Notes	DM09 - Safe local environment	N	DM23 - Create opportunities for people from different communities to have increase contact with each other	N
		DM20 - Provide services & facilities appropriate for the needs of BME groups, older people, young people and disabled people	N	DM51 - Increase/maintain accessibility to key services & facilities	N
		DM21 - Reduce overall levels of economic and social deprivation	N		

SA8 - Green space, sports & recreation	-	DM24 - Increase / maintain quantity of green space	-	DM27 - Improve accessibility of green space	-
	Notes	DM25 - Increase/maintain indoor & outdoor sports provision	-	DM28 - Increase / maintain public rights of way	N
		DM26 - Increase quality of green space	-		
SA9 - Efficient & prudent use of land	+	DM29 - Promote brownfield & minimise greenfield devlpmt	+	DM32 - Minimise loss of high quality agricultural land	+
	Notes	DM30 - Promote higher density development	N	DM33 - Prevent unacceptable risk from land instability	N
		DM31 - Minimise loss of Green Belt land	++		
SA10 - Biodiversity & geodiversity	+	DM34 - Protect & enhance / create new habitat	+	DM37 - Increase green infrastructure provision	+
	Notes	DM35 - Protect & enhance protected / important species	+	DM38 - Protect sites of geological interest	+
		DM36 - Protect/enhance all designated nature conservation sites	+		
SA11 - Climate change mitigation	N	DM39 - Reduce greenhouse gas emissions from transport	N	DM41 - Reduce greenhouse gas emissions from energy generation & distribution	N
	Notes	DM40 - Reduce greenhouse gas emissions from buildings	-		
SA12 - Climate change adaptation	N	DM37 - Increase green infrastructure provision	+	DM76 - Build capacity for biodiversity to adapt to climate change	N
	Notes	DM42 - Prepare for likelihood of increased flooding	N		
SA13 - Flood risk	+	DM43 - Reduce risk of flooding from rivers	+		
	Notes	DM44 - Reduce risk of surface water flooding	N		

SA14 - Transport network	N	DM45 - Increase proportion of journeys by non-car modes	N	DM48 - Encourage freight transfer from road to rail/water	N	
		Notes	DM46 - Ease congestion on road network	N	DM49 - Reduce transport-related accidents	N
			DM47 - Make environment more attractive for non car users	N		
SA15 - Accessibility	N	DM02 - Access to employment (transport)	N	DM51 - Increase/maintain accessibility to key services/facilities	N	
		Notes	DM50 - Appropriate provision of key services & facilities	N		
SA16 - Waste	N	DM52 - Provide or safeguard facilities for waste management (storage at source; recycling; recovery; processing)	N	DM53 - Reduce waste sent to landfill (recycling & recovery facilities)	N	
		Notes				
SA17 - Air quality	N	DM54 - Avoid exposure to poor air quality	N	DM77 - Reduce/avoid adverse air quality impacts on nature conservation sites	N	
		Notes	DM55 - Impact of policy / proposal on air quality	N		
SA18 - Water quality	N	DM56 - Improve the quality of water bodies (rivers, streams, lakes & groundwater)	N	DM78 - Reduce/avoid adverse water quality impacts on nature conservation sites	N	
		Notes				
SA19 - Land & soils quality	N	DM57 - Promote remediation of contaminated land	N			
		Notes				
SA20 - Amenity	N	DM58 - Reduce / avoid exposure to noise pollution	N	DM60 - Reduce / avoid exposure to odour nuisance	N	
		Notes	DM59 - Reduce / avoid exposure to light pollution	N	DM61 - Avoid inappropriate devt. within HSE Major Haz Zones	N
SA21 - Landscape & townscape quality	+	DM62 - Maintain / enhance special landscape areas	+	DM65 - Maintain / enhance landscape character of the area	+	
		Notes	DM63 - Protect/enhance landscape features (trees, hedgerows, ponds, dry stone walls)	+	DM66 - Provide landscape features in new development	N
			DM64 - Increase quality & quantity of woodland	N	DM67 - Ensure devt. in urban areas appropriate to its setting	N
					DM68 - Encourage innovative and distinctive urban design	N
SA22 - Historic environment	N	DM69 - Conserve / enhance designated & non designated heritage assets and their setting	N	DM70 - Reduce number of heritage assets 'at risk'	N	
		Notes				
SA23 - Energy & resource efficiency	-	DM71 - Increase energy efficiency of buildings/development	-	DM74 - Promote low carbon energy distribution & storage such as heat networks	N	
		Notes	DM72 - Increase water efficiency of buildings/development	-	DM75 - Safeguard land designated for minerals use & promote prior extraction	N
			DM73 - Increase proportion of energy generated from renewable/low carbon sources	-		

SA scores - final

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SA1 - Employment	-	DM01, DM02, DM03
SA2 - Business investment / economic growth	N	DM02, DM04, DM05, DM06, DM07
SA3 - Health	N	DM02, DM03, DM08, DM09, DM10, DM19, DM37, DM50, DM51c, DM54, DM55, DM71a
SA4 - Crime	N	DM11
SA5 - Culture	N	DM04c, DM12, DM13, DM14, DM15, DM16
SA6 - Housing	N	DM17, DM18, DM19
SA7 - Social inclusion & community cohesion	N	DM02, DM09, DM20, DM21, DM22, DM23, DM51
SA8 - Green space, sports & recreation	-	DM24, DM25, DM26, DM27, DM28
SA9 - Efficient & prudent use of land	+	DM29, DM30, DM31, DM32, DM33
SA10 - Biodiversity & geodiversity	+	DM34, DM35, DM36, DM37, DM38
SA11 - Climate change mitigation	N	DM39, DM40, DM41
SA12 - Climate change adaptation	N	DM37, DM42, DM76
SA13 - Flood risk	+	DM43, DM44
SA14 - Transport network	N	DM45, DM46, DM47, DM48, DM49
SA15 - Accessibility	N	DM02, DM50, DM51
SA16 - Waste	N	DM52, DM53
SA17 - Air quality	N	DM54, DM55, DM77
SA18 - Water quality	N	DM56, DM78
SA19 - Land & soils quality	N	DM57
SA20 - Amenity	N	DM58, DM59, DM60, DM61
SA21 - Landscape & townscape quality	+	DM62, DM63, DM64, DM65, DM66, DM67, DM68
SA22 - Historic environment	N	DM69, DM70
SA23 - Energy & resource efficiency	-	DM71, DM72, DM73, DM74, DM75

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Outcome - commentary

This option has neutral effects for the majority of SA objectives reflecting the fact that deletion of sites will not affect the majority of the objectives. There is a negative impact on employment (SA1) due to the loss of an employment allocation of 21 ha of land and loss of jobs in the construction and employment sector. There are 2 further negative effects on greenspace, sports & recreation (SA8) as less housing development will create less on-site green space provision and on energy & resource efficiency (SA23) as the removal of the allocations would potentially lead to less energy and resource efficient homes being constructed. The effect on the housing objective (SA6) is neutral overall as district wide housing delivery will be maintained by this option, however there will be less provision for meeting local housing needs arising from the deletion of housing sites in the outer areas (HMCAs) with Green Belt. There are 4 positive effects relating to environmental objectives (efficient & prudent use of land (SA9), biodiversity & geodiversity (SA10), flood risk (SA13) and landscape & townscape quality (SA21) due to Green Belt land being retained.

Appendix Notes to Accompany SA of Options

Option	SA Objective	Comment for Assessment of Option Against SA Objective
Option 2	SA1	The overall effect is considered to be negative reflecting loss of a 21 ha employment allocation and loss of temporary construction jobs (DM01). Neutral effect for access to employment (transport)(DM02) and improve skills & access to training (DM03), negative effect identified for more jobs (DM01)
Option 2	SA2	Neutral scores for the majority of decision making criteria as deletion of the 37 allocations. Will not have an effect on access to employment (transport) (DM02), increasing the vibrancy of centres (DM05), promotion of improved ICT networks (DM06) and growth and diversity of the rural economy (DM07). However there will be a negative effect on promote economic development (DM04) due to loss of employment site.
Option 2	SA3	Neutral scores for the majority of decision making criteria as deletion of 37 allocations will not increase the impact of the Plan on the criteria, which include safe local environment (DM09), increase/maintain access to fresh food (DM10) and avoid exposure to poor air quality (DM54). There will be a positive score for increase green infrastructure provision (DM37) as the retention of the Green Belt will retain more open areas suitable for green infrastructure and a negative score for increased energy efficiency for domestic buildings (DM71a) due no new houses being built.
Option 2	SA4	Overall neutral score as decision making criteria DM11 for reduction in crime rates/fear of crime scores neutral as the effect is unknown.
Option 2	SA5	Overall neutral score. Neutral scores for all 6 decision making criteria as deletion of 37 allocations will not increase the impact of the Plan on the criteria, which include development of tourism and cultural facilities (DM04c) and supporting further and higher education sectors (DM15).
Option 2	SA6	Positive score for meeting housing delivery targets (DM17) as overall targets met even with deletion of the 37 allocations, although distribution across HMCAs is made more uneven through the deletion of the sites. There is a negative score for provide appropriate mix of housing types & sizes (DM18) due to loss of affordable housing through not developing these sites and a neutral score for improve quality/standard of housing (DM19). Therefore overall a neutral score is given.
Option 2	SA7	Overall neutral score. Neutral scores for all 7 decision making criteria as deletion of 37 allocations will not increase the impact of the Plan on the criteria, which include provision of services and facilities for BME, older, young and disabled people (DM20) and creating opportunities for people from different communities to have increased contact (DM23).
Option 2	SA8	Negative score for the majority of decision making criteria including increase/maintaining quality of green space (DM24) and increase/maintain quality of green space (DM26) as no green space will be delivered as the housing allocations are deleted. There will be a neutral effect on increase/maintain public rights of way (DM28) as the effects are unknown.
Option 2	SA9	Overall positive effect reflecting positive effects of minimising the loss of Green Belt land (DM29) and minimising loss of high quality agricultural land (DM32). Remaining criteria score neutral, including promotion of higher density development (DM30) as deletion of 37 allocations will not increase the impact of the Plan on these criteria.
Option 2	SA10	The overall effect is positive as all criteria have a positive score including protection and enhancing/creating new habitat (DM34) and protect/enhance all designated nature conservation sites (DM36) as retaining 37 sites as Green Belt will retain existing biodiversity and geodiversity.
Option 2	SA11	Neutral scores for the majority of decision making criteria (including reduce greenhouse gas emissions from transport (DM39) and reduce greenhouse gas emissions from energy generation and distribution (DM41) except reduce greenhouse gas emissions from buildings (DM40) if the 37 sites are not released as allocations. Therefore overall neutral score given.
Option 2	SA12	Neutral scores for majority of decision making criteria as reliance on existing allocations and sites with planning permission will not increase the impact of the Plan on, preparation for likelihood of increased flooding (DM42) and building capacity for biodiversity to adapt to climate change (DM76). There is a positive effect on increasing green infrastructure provision (DM37) due to the retention of the Green Belt arising from deletion of the allocations.
Option 2	SA13	Overall positive score reflecting the reduced risk of flooding through deletion of allocations (reducing the risk of flooding from rivers (DM43)). The effect on risk to surface water flooding (DM44) unknown).
Option 2	SA14	Neutral score for all decision making criteria (including increase proportion of journeys by non-car modes (DM45), ease congestion on road network (DM46) and reduce transport-related accidents (DM49) as the deletion of the 37 allocations will not the impact the transport network.
Option 2	SA15	Neutral score for all decision making criteria (including appropriate provision of key services & facilities (DM50) and increase/maintain accessibility to key services/facilities (DM51) as deletion of the 37 allocations will not affect the accessibility considerations.
Option 2	SA16	Neutral score for all decision making criteria (provide or safeguard facilities for waste management (DM52) and reduce waste sent to landfill (DM53) as deletion of the 37 allocations will not affect this SA objective related to waste.
Option 2	SA17	Neutral scores for all decision making criteria as deletion of 37 allocations will not increase the impact of the Plan on the criteria. All 3 criterion score neutral as effects unknown or no link to; avoiding exposure to poor air quality (DM54), impact of policy/proposal on air quality (DM55) and reducing/avoiding adverse air quality impacts on nature conservation sites (DM77).
Option 2	SA18	Overall neutral score. Neutral scores for both decision making criteria as deletion of 37 allocations will not effect the impact of the Plan on the criteria (improving quality of water (DM56) and avoiding/reducing adverse water quality impacts on nature conservation sites (DM78)).
Option 2	SA19	Overall neutral score as promotion of remediation of contaminated land (DM57) scores neutral because deletion of 37 allocations will not effect the impact of the Plan on the criterion.

Option	SA Objective	Comment for Assessment of Option Against SA Objective
Option 2	SA20	Overall neutral score. Neutral scores for all 4 decision making criteria as deletion of 37 allocations will not effect the impact of the Plan on the criteria, which include reduction/avoidance of exposure to noise pollution (DM58), light pollution (DM59), odour nuisance (DM60) and avoiding inappropriate development in major hazard zones (DM61).
Option 2	SA21	Half of the decision making criteria score positive (maintain/enhance special landscape areas (DM62), protect/enhance landscape features (DM63) and maintain landscape character of the area (DM65) and the remainder score neutral (provide landscape features in new development (DM66), ensure development in urban areas appropriate to its setting (DM67) and encourage innovative and distinctive urban design (DM68). Overall the effect is considered to be positive due to the deletion of 37 allocations from the Green Belt which will maintain existing landscape and townscape.
Option 2	SA22	Neutral score for all decision making criteria (conserve / enhance designated & non designated heritage assets and their setting (DM69) and reduce number of heritage assets 'at risk' (DM70) due to deletion of 37 allocations
Option 2	SA23	Negative effect on increase energy efficiency of buildings/development (DM71), increase water efficiency of buildings/development (DM72) and increase proportion of energy generated from renewable/low carbon sources (DM73) due to the deletion of 37 allocations means that less energy and resource efficient houses will be developed. Neutral score for promote low carbon energy distribution & storage such as heat networks (DM74) and safeguard land designated for minerals use and promote prior extraction (DM75) as the effects are unrelated. The effect on SA23 is negative overall.