

**Wakefield Local Development Framework
Central Wakefield Area Action Plan
(17 June 2009)
Sustainability Appraisal / Strategic Environmental Assessment
Post Adoption Statement**

Introduction

City of Wakefield Metropolitan District Council adopted the Local Development Framework (LDF) Central Wakefield Area Action Plan (CWAAP) on the 17th June 2009.

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which requires a statement to be produced on adoption of a plan or programme, to detail:

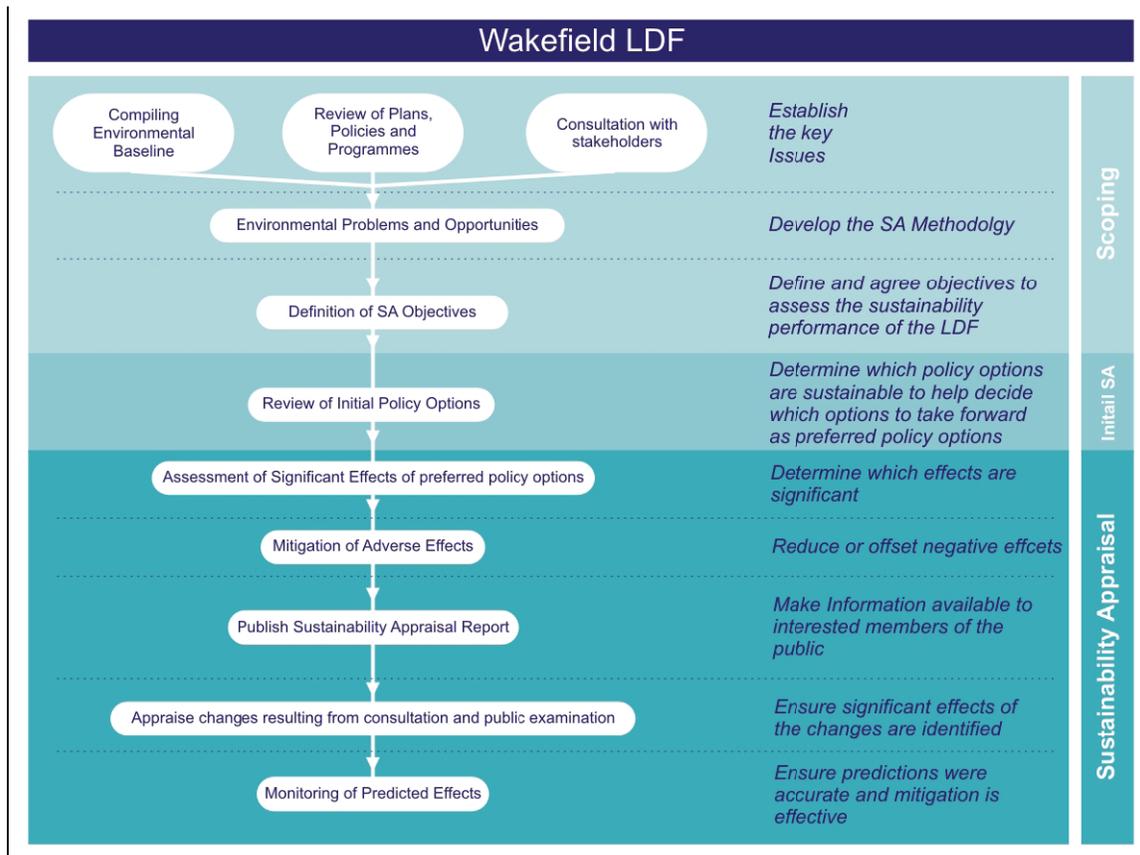
1. How environmental considerations have been integrated into the plan or programme;
2. How the Environmental Report has been taken into account;
3. How opinions expressed through public consultation have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Planning Policy Statement 12 widens these considerations from environmental, to broader sustainability issues, so that this statement provides information on the wider sustainability appraisal process, which incorporated Strategic Environmental Assessment. This statement examines each of these points in turn.

A: SUSTAINABILITY APPRAISAL

1. How environmental considerations have been integrated into the Central Wakefield Area Action Plan.

The Sustainability Appraisal (SA) for the Central Wakefield Area Action Plan (CWAAP) has been an iterative process carried out for each key stage of the document, including issues and options, preferred options, and submission stages. The appraisal methodology has incorporated the European Directive on Environmental Assessment of Plans and Programmes (Strategic Environmental Assessment (SEA)). In addition, the Council has conducted Habitats Regulation Assessments due to the presence of a designated European site in the district.



Summary of the SA Process

The Appraisal Framework

The key environmental, social and economic issues arising in the district were identified during the scoping stage. Based on these key issues, fifteen SA Objectives were developed, to provide the framework for assessing the plans. The Central Wakefield Area Action Plan (including the objectives and policies for central Wakefield) has been appraised against the agreed SA Objectives, focussing on identifying the significant environmental, social, and economic effects which may result from the implementation of

the plan. The plan was assessed for the likely impact against the 15 SA objectives in a matrix. The level of predicted impact was categorised as follows:-

✓✓	Very sustainable
✓	Sustainable
?	Uncertain
-	Neutral
x	Unsustainable
xx	Very unsustainable

In order to comply with the Strategic Environmental Assessment Directive, the assessment took account of:-

- The likely significance and timeframe of any impacts.
- Cumulative effects such as encouraging development near to public transport links, improving public transport and encouraging walking and cycling, all of which should help to reduce car usage and the related problems of air pollution and greenhouse gas emissions.
- Mitigation measures or changes needed in the documents to overcome or minimise adverse impacts.

Identifying environmental, social and economic considerations: scoping report.

After documenting the sustainability characteristics of the area, and identifying any trends (i.e. is the situation getting better or worse?), other relevant strategies, plans and programmes were reviewed to see how these would influence the SA and the LDF. From the outputs of these two initial stages, the key environmental, social and economic issues and opportunities that relate to the area, and on which the assessment should focus, were established. Based on these key issues, the fifteen SA Objectives were developed as shown below. The SA Framework and objectives correspond with those used to assess the LDF Core Strategy and Development Policies documents which are now adopted :-

THEME	SUSTAINABILITY OBJECTIVE
Economic	SA1 Good quality employment opportunities available to all; SA2 Conditions which enable business success, economic growth and investment;
Social	SA3 Education and training opportunities to build skills and capacities; SA4 Conditions and services to engender good health; SA5 Safety and security for people and property; SA6 Vibrant communities to participate in decision making; SA7 Create, enhance and provide accessibility to culture, leisure and recreation activities; SA8 Local needs met locally; SA9 Quality housing available to everyone;
Environmental	SA10 To provide a transport network which maximises access whilst

	<p>minimising detrimental impacts;</p> <p>SA11 A quality built environment that protects and enhances its historic assets, and efficient land use patterns that make good use of derelict sites, minimise travel and promote balanced development;</p> <p>SA12 A bio-diverse and attractive natural environment;</p> <p>SA13 Minimal pollution levels;</p> <p>SA14 Minimal greenhouse gas emissions and a managed response to the effects of climate change; and</p> <p>SA15 Prudent and efficient use of energy and natural resources with minimal production of waste.</p>
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2. How the Environmental Report has been taken into account

The SA has been an iterative and ongoing process, and has informed the development of the document during various stages of its preparation. The process of formulating the final policies that were included in the submission Central Wakefield Area Action Plan has involved various stages of SA and consultation, each of which has helped inform and steer the policy development. Through the ongoing SA process there have been a number of stages where recommendations have been made as draft documents have been produced, and as a result amendments have been made to both the policies themselves and the supporting text. This has improved the overall sustainability of the document.

Initial Sustainability Appraisal of Issues and Options

An Initial Sustainability Appraisal Report was produced in June 2005 which documented the appraisal of the options that were included in the Issues and Options Report.

The options considered at this stage included broad strategic options for growth as well as more detailed options relating to urban design, economic development and leisure. At this stage the appraisal also considered a 'do-nothing' option to indicate how the current baseline conditions would evolve without implementation of the CWAAP.

It is important to note that the SEA Directive requires the assessment of 'reasonable alternatives'. For the purposes of this sustainability appraisal, 'options' and 'alternatives' have the same meaning.

The SA commented on how sustainable the options would be along with any considerations that would need to be taken into account when implementing the option. This information assisted the Council in selecting preferred options. Where options that were identified as sustainable by the appraisal were not taken forward into the preferred options, a justification for this was documented in the Preferred Options SA Report.

The results of the appraisal at the issues and options stage are included in the Initial SA Report which can be accessed via the Wakefield Council website at:

<http://www.wakefield.gov.uk/ldf>

- **Recommendations at Issues and Options Stage**

The Initial Sustainability Appraisal made recommendations for an additional option to be developed in order to cover a topic to provide and enhance linkages between existing green corridors and the public realm, from within the CWAAP to adjoining areas and to create a green lung into the City centre. This was considered to be under represented in the Issues and Options Paper. Policy CW25 now makes reference to retaining and enhancing the Wildlife Habitat Network and supporting text has been provided to clarify the role of the WHN within central Wakefield.

Sustainability Appraisal of Preferred Options

This stage of the SA involved predicting the environmental, social and economic effects that were likely to result from the implementation of the preferred policy options, and then evaluating the significance of the predicted effects. Where adverse effects were identified recommendations were made as to how these could be mitigated.

The results of the appraisal were documented in the SA report that was produced to accompany the consultation on the Preferred Options Report in January and February 2007.

At this stage the appraisal results were reported against each SA objective so that any cumulative effects could be more easily identified. The results were also summarised on a policy by policy basis so that the Council and consultees could appreciate how individual policies performed in terms of their overall sustainability.

The full SA report can be accessed via the Wakefield Council website at: <http://www.wakefield.gov.uk/ldf>

- **Recommendations at Preferred Options Stage**

The SA Report which was produced to accompany the Preferred Options Report included a series of recommendations as to how the DPD could help towards achieving the objectives and sub-objectives that make up the Sustainability Appraisal Framework.

The recommendations are detailed in Appendix C of the Preferred Options Report, along with a response from the Council as to how they have been taken on board in finalising the CWAAP. This can be viewed at <http://www.wakefield.gov.uk/ldf> Key recommendations were:

- Accounting for the education requirements arising from increased levels of children in the new residential developments;
- Locating sensitive developments away from Air Quality hotspots;
- Encouraging development to front onto the waterfront and road;
- Introducing traffic calming measures;
- Accounting for local housing requirements including tenure, type and size;
- Providing more emphasis on tree planting and greening using native species;
- Incorporating SUDS into new developments; and
- Considering waste recycling facilities in the new developments.

3. How opinions expressed through public consultation have been taken into account

During the preparation of the Central Wakefield Area Action Plan there have been three stages of formal consultation relating to the SA: the Scoping Report; the Initial SA Report; and the Preferred Options SA Report.

Scoping Report

A copy of the Scoping Report was sent out for a five week consultation period ending on 10 June 2005. In accordance with the Strategic Environmental Assessment (SEA) Regulations the following four statutory consultee bodies were consulted:

- Countryside Agency (now Natural England)
- English Nature (now Natural England)
- English Heritage
- Environment Agency

In addition, and in accordance with Planning Policy Statement 12: Local Development Frameworks (ODPM, 2004) and DCLG guidance, the following bodies were also consulted:

- British Waterways Yorkshire Office
- Commission for Architecture and the Built Environment (CABE)
- Disability Information and Advice Line (DIAL)
- Groundwork Yorkshire and the Humber
- Learning and Skills Council for Yorkshire
- The Sustainable Transport Charity (SUSTRANS)
- West Yorkshire Ambulance
- West Yorkshire Ecology
- West Yorkshire Fire Brigade
- West Yorkshire Police
- West Yorkshire Strategic Health Authority
- Yorkshire and Humber Assembly
- Yorkshire Forward
- Yorkshire and Humber Tourist Board
- Mid Yorkshire Chamber of Commerce and Industry
- Mid Yorkshire NHS Trust
- Yorkshire / Sheffield Wildlife Trust
- Wakefield District Biodiversity Group
- Wakefield and District Housing
- Wakefield First
- Wakefield Civic Society
- Wakefield City Centre Management Board

(The Yorkshire and Humber Assembly has since been disbanded with its functions transferred to Local Government Yorkshire and Humber and Yorkshire Forward.)

The consultation responses received were summarised in the Initial SA Report and amendments made to the SA Framework and baseline information at that time have been carried through into the SA Report of the CWAAP.

As a result of a response from English Nature (now Natural England) the SA framework was modified for the next stage, the appraisal of options. The changes suggested the inclusion of an additional indicator for **Objective SA11:**

New Indicator: ***Loss or damage to the character or setting of a Conservation Area***

The Countryside Agency (now Natural England) requested that an additional option be included relating to green corridors, public space, wildlife and human quality of life. As a result of this option UD7 was formulated

Option UD7: Provide and enhance linkages between existing green corridors and public realm, from within the AAP to adjoining areas, and to create a green lung into the City centre.

The Initial SA Report can be accessed at www.wakefield.gov.uk/ldf

Initial SA Report

Consultation on the Initial SA report was undertaken over a six week period during late June and July 2005. The Initial SA Report was made available for comment to all the organisations listed above as well as the general public and the organisations selected for consultation on the Issues and Options Report.

A total of eight comments were received about this document. The main points arising were:

- Quality is as important as quantity - more housing could lead to poor residential environments;
 - Creation of the Emerald Ring could have impacts on the historic environment;
 - Additional objectives for AAP to reflect those in SA:
1. Encourage resource efficient development that minimises water usage and reduces waste output during and after construction.
 2. Development along the river corridor should enhance and not just protect the water environment surrounding wildlife habitats.
 3. Promote on-site remediation of contaminated land to reduce the need to transfer contaminated soils to landfill or elsewhere off site.
 4. Minimise and reduce flood risk through appropriate development and by avoiding development in high risk flood zones.

English Heritage raised the point that the introduction of the Emerald Ring may result in the demolition of a number of listed buildings. They also wanted to ensure that the SA would take into account the likely effects of the CWAAP on the district as a whole and not just on the plan area itself. Increased traffic and reductions in air quality outside the plan area was provided as an example.

The Environment Agency response requested that more attention should be given to minimising and reducing flood risk through appropriate development and by avoiding

development in high flood risk zones, resource efficiency in terms of water usage and waste reduction, enhancement (not just protection) of the water environment, and contaminated land remediation.

Next Generation Community Youth Project asked that more emphasis should be provided to the quality of the housing and open spaces in the area, not just the number of houses provided.

How consultation has been undertaken, and a summary of all the consultation responses, has been published separately by WMDC in the Initial Statement of Pre-Submission Consultation. This document is available to view and download on the Council's website at www.wakefield.gov.uk/ldf

Preferred Options SA Report

As a result of the issues and options consultation process, the Council identified a number of 'preferred options' to indicate how some of the issues facing central Wakefield could be approached. A report was published for consultation and comment in January 2007 covering the preferred options for the Central Wakefield Area Action Plan.

The reports took into account comments made at the issues and options stage, the findings of the initial sustainability appraisal, together with national and regional planning policy. These factors combined to result in a set of 'preferred options' to indicate how the Council could approach the locally important issues facing central Wakefield in the light of planning policy. In doing this, the Council considered a range of reasonable alternatives and, where these were not considered appropriate, were clearly set out as rejected options.

Twenty six representations were made on the SA Report which was produced to accompany the Preferred Options Report in January 2007. This consultation stage made use of a web based system to document the responses. The full consultation responses can be viewed via the following weblink <http://consult.wakefield.gov.uk/>

The following particular points were raised by the Environment Agency English Heritage and Yorkshire Forward. These comments along with the Council's responses are summarised in the table below:

Summary of SA Consultation Responses	
Consultation Response	How the response has been taken into account
English Heritage (EH)	
EH were concerned that the SA objective SA11 is a composite objective and leads to a "lowest common denominator" result, even if some of the sub-elements are shown to be very sustainable.	When assessing the policies against the objectives the sub-objectives are taken into account and the commentary that supports the overall appraisal result provides an explanation of the effects that have been identified.
EH were concerned that the CWAAP may have a significant effect on assets outside the CWAAP area.	The Council does not expect there to be any significant impacts on historic assets outside the plan boundary as a result of the proposals.
EH suggested mitigation measures for those sites which may impact upon the historic assets within the CWAAP area. For example, where sites lie within or impact on one of the Conservation Areas, a	Conservation Appraisals have been carried out. Reference will be made in the CWAAP to the aspects of the historic environment that are relevant to each site as follows:

<p>Conservation Area Appraisal should be produced to inform decision making, the justification for the site allocations should identify those aspects of the historic environment which need to be taken into consideration, detailed design briefs should be produced for each of these sites to guide development and clarification should be provided that 'landmark' does not necessarily mean that the building has to be tall.</p>	<ul style="list-style-type: none"> • Chantry Bridge is in the Waterfront Conservation Area. • Marsh Way/Northgate abuts the Wentworth Terrace Conservation Area. • Westgate/Quebec Street abuts the Lower Westgate Conservation Area. <p>More detailed design work /master planning will be done for those sites that are located in Special Policy Areas. It will be clarified that "landmark" does not necessarily mean that the building has to be tall.</p>
<p>Environment Agency (EA)</p>	
<p>In the land and soil section, mention should be made of any Source Protection Zones which lie in this area. Source Protection Zones should also be mentioned in the Water Resources section.</p> <p>The Environment Agency would like acknowledgement of the requirement in PPS25 to undertake the Sequential Test at all stages of planning and a commitment to trying to direct all new development towards the areas of lowest flood risk. A conflict should be highlighted between the CWAAP objectives which promote city centre development and SA Objectives which aim to direct development away from flood risk areas. As significant areas of the city centre are in Flood Zone 3, there is an inevitable conflict between development and flood risk.</p> <p>Targets from the UK Climate Change Programme and Air Quality Strategy: Working Together for Cleaner Air should be included in Appendix B. The recently published draft PPS1 Climate Change Supplement should also be included as a relevant plan/programme.</p> <p>The EA recommend that the flood risk elements of Objective 11 are removed as flood risk is covered under SA 14.</p> <p>The 'Floodplains' indicator should be defined using Flood Zones. SA12 - A possible indicator for the 'bio-diverse and attractive natural environment indicator' could be 'Length of wildlife corridor in the area'. SA13 - A possible indicator could be 'Area of contaminated land remediated'. SA11 to SA15 – The indicators require further consideration.</p>	<p>This has now been added.</p> <p>Reference to PPS25 and the sequential test has now been made explicit. The Council has commissioned further work on flood risk in central Wakefield and the SFRA is also being updated. The Submission document will include the findings of this flood risk assessment which will also inform the sequential and exception tests. All references will be to PPS25. The conflict between the CWAAP objectives and flood risk has now been highlighted.</p> <p>These plans have now been incorporated into Appendix B.</p> <p>All sub-objectives relating to flood risk have been moved from SA11 to SA14.</p> <p>The indicators have been removed from the SA Framework as the sub-objectives are considered sufficiently detailed for the decision making process. Monitoring proposals have been identified to monitor the significant effects of the plan and where applicable, these have used the indicators originally included within the SA Framework.</p>
<p>Yorkshire Forward (YF)</p>	
<p>YF welcomed the SA objectives, SA methodology and monitoring methods. However, YF would like the monitoring to encourage developers to achieve BREEAM Very Good and Excellent Ratings.</p>	<p>National Standards have now been included in monitoring framework to avoid the CWAAP being tied to one particular standard.</p>

4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

Between the publication of the Issues and Options Report and the Preferred Options Report, work was ongoing in the development of the CWAAP. This work was informed by the consultation process that was undertaken at the Issues and Options stage. As a result of this some of the options were not taken forward whilst others were subsumed within the new options. In some cases the new options had no link to the original options, having been developed to cover an issue not originally covered by an option in the Issues and Options Report. The full details of these can be seen in tables 4, 5 and 6 of the Preferred Options Report Sustainability Appraisal at www.wakefield.gov.uk/ldf. Table 6 is shown below as an informative example.

Table 6 Options developed to fill in gaps in initial SA

Options recommended in the Initial Sustainability Appraisal	How the Preferred Options have changed
An additional option was recommended to provide and enhance linkages between existing green corridors and the public realm, from within the AAP to adjoining areas and to create a green lung into the City centre.	Policy CW20 has been included to safeguard the area of Wildlife Habitat Network that falls within the boundary of the AAP area. Other policies dealing with this issue are being developed as part of the Core Strategy and Development Policies DPD.

The SA Report that was produced to accompany the Preferred Options Report included a series of recommendations as to how the DPD could help towards achieving the objectives and sub-objectives that make up the SA framework. These are detailed in appendix C of the final SA report of the submission CWAAP which can be viewed in full at www.wakefield.gov.uk/ldf

The objectives of the submission version of the CWAAP set out below were developed from the strategic objectives of the LDF as set out in the Core Strategy and the results of the public consultation and sustainability appraisal process. The submission CWAAP was developed in order to achieve these objectives.

1. To reduce traffic levels within Wakefield city centre and enable all users to gain equal access to shops and services by making it more pedestrian friendly, safer and more accessible by foot, bicycle and public transport.
2. To encourage city living for different types of household and tenure to meet the housing needs/requirements for central Wakefield.
3. To regenerate the local economy by focussing major new office, retail and leisure development within central Wakefield.
4. To protect and enhance the historic and distinctive character of central Wakefield, including the skyline and strategic views of the spires and towers.
5. To promote the highest standards of design and construction in new developments within central Wakefield by making best use of existing resources and renewable energy technologies and minimising carbon emissions.
6. To enhance the public realm and improve links between the city centre and surrounding areas, including the waterfront.
7. To protect and enhance the natural environment by promoting biodiversity and recreational opportunities within the waterfront and providing greenspaces within new developments.

8. To influence the location, layout and design of new development so that it reduces or minimise the risk of flooding and does not have an adverse impact on air quality, noise and light pollution.
9. To increase the attractiveness of central Wakefield for residents, workers, shoppers, tourists and visitors, including those previously lost to other centres.
10. To promote a vibrant evening economy for a wide range of ages and social groups whilst improving pedestrian safety and reducing opportunities for crime.

Following the Examination the following principal changes have been made to the CWAAP as required by the Inspector's report:-

- Clarify the main purposes of the AAP, its links with the Sustainable Community Strategy and the strategy for delivery of its Vision.
- List the policies of the UDP that will be replaced by the AAP.
- Clarify compliance with the sequential and exceptions tests of PPS25.
- Add a policy for housing provision in Central Wakefield.
- Combine policies CW1 and CW2; CW3 and CW4; and CW9 and CW10.
- Delete Policy CW14.
- Delete Policy CW22.
- Clarify the mechanisms for delivery and monitoring the Vision, policies and proposals of the AAP, together with contingency plans to take account of a slowing economy.

Full details of the schedule of changes to the document can be found in Annexes A and B of the Inspector's Report on the Examination into the Central Wakefield Area Action Plan Development Plan Document available on the Council's website <http://www.wakefield.gov.uk/ldf>

5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

The monitoring of the Central Wakefield Area Action Plan needed to measure its significant effects is set out in the following documents:-

- Chapter 6 and Appendix A of the Central Wakefield Area Action Plan which set out the delivery and implementation framework together with key indicators and targets; and
- Chapter 7 of the Central Wakefield Area Action Plan Sustainability Appraisal which sets out the indicators and targets for all the headline sustainability objectives used in the SA.

The delivery and monitoring framework set out in the CWAAP is centred on the 10 objectives of the plan as listed in section 4 above.

Set out below is a selection of indicators and targets which deal with these issues. For a full set of the indicators and targets, it will be necessary to look at Chapter 6 of the CWAAP and Chapter 7 of the Sustainability Appraisal.

Extract from the CWAAP Monitoring Framework: Objective 1

Central Wakefield Area Action Plan Objective 1:

To reduce traffic levels within Wakefield city centre and enable all users to gain equal access to shops and services by making it more pedestrian friendly, safer and more accessible by foot, bicycle and public transport.

Policy / Topic	Indicators	Targets	Delivery Agency	Implementation
Emerald Ring (Policies CW1 and CW2)	1 Car trips per year	A 3% reduction in city centre traffic (2011) Source: West Yorkshire Local Transport Plan	Wakefield MDC, Highways Agency, Metro and bus operators	Numbers of vehicles entering or leaving the central cordon. Demand management
Cyclists (CW4)	1 Number of cycle trips	5% of the number of journeys to work to central Wakefield by cycle by 2012 Source: West Yorkshire Local Transport Plan	Wakefield MDC and West Yorkshire Local Transport Plan	We will implement this policy by proactively managing planning applications and related processes such as section 106 agreements and cycle parking standards
Location of car parks (Policy CW3)	1 Long stay car parking spaces located outside the Emerald Ring	90% by 2021	Wakefield MDC and private car park operators	Proactively managing planning applications and related processes such as travel plans

Extract from the CWAAP Monitoring Framework: Objective 5

Central Wakefield Area Action Plan Objective 5:

To promote the highest standards of design and construction in new developments within central Wakefield by making best use of existing resources and renewable energy technologies, and minimising carbon emissions.

Policy / Topic	Indicators	Targets	Delivery Agency	Implementation
Emerald Ring – Design Principles (Policy CW2)	1 Percentage of works to the Emerald Ring that accord with the design principles set out in Policy CW2.	100%	Developers, Highways Agency and Wakefield MDC.	Proactively managing development through planning applications and related processes such as highway maintenance
Development Sites (Policy CW18) and Special Policy Areas (policies CW19 to CW24).	1 All new developments within Special Policy Areas and Development Sites to comply with national standards.	100%	Wakefield MDC - planning and building control	Proactively managing development through planning and building regulation applications
Public Realm – Hierarchy of Quality (Policy CW13)	1 Percentage of public realm improvements in accordance with the hierarchy of quality	90%	Developers, Wakefield MDC and partners (including the design advisory panel)	Proactively managing development through planning applications and related processes

Extract from CWAAP SA Report Monitoring Proposals

SA7 - Create, Enhance and Provide Accessibility to Culture, Leisure and Recreation Activities			
	The CWAAP encourages development and enhancement of good quality culture, leisure, recreation and open space facilities and improving accessibility by public transport.	No	Local
	Number of culture, leisure and recreation facilities		
	Number of new culture, leisure and recreation facilities granted planning permission	No	Local
	Proximity of facilities to public transport modes	No	Local
	Number of planning applications where contributions are secured to contribute toward providing or improving open space.	No	Local
SA8 – Local Needs Met Locally			
	The CWAAP should ensure that local services are provided to meet communities' needs.	Similar	National Core 3b
	Percentage of new housing developments (schemes of 10 dwellings or more) which conform to the RTS Accessibility Criteria		
	Percentage of residents within 120m of an accessible greenspace	No	Local
			Verify sources Possibly Greenspace strategy
SA9 Quality Housing Available to Everyone			
	The CWAAP should contribute towards meeting the housing needs for the area with provision of amenity space.	Similar to 2d	National Core 2d
	Affordable housing provision by location and number		
	Changes of use from residential to office space should not detrimentally impact on housing numbers and affordability.	Monitoring of this minor uncertainty is not considered to be required.	Council records to be updated to include this indicator.
SA10 To Provide a Transport Network which Maximises Access whilst Minimising Detrimental Impacts			
	The CWAAP seeks to encourage the use of non-car based transport modes and reduce the need to travel. However, increased attractiveness of the area may result in more traffic entering Central Wakefield.	No	Yes. The Council regularly carries out movement counts in the city centre for different types of transport on behalf of LTP.
	Percentage of residents surveyed using different modes of transport, their reason for, and distance of, travel		
	Car trips per year		
	Proportion of journeys on foot or by cycle	No	Verify sources. Possibly LTP.

B: HABITAT REGULATIONS ASSESSMENT (APPROPRIATE ASSESSMENT)

1. How environmental considerations have been integrated into the Central Wakefield Area Action Plan.

Articles 6(3) and 6(4) of the Habitats Directive (92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna) require Appropriate Assessment (AA) to be carried out for plans and projects that are likely to affect a Natura 2000 site (1) such as a Special Area of Conservation (SAC), a Special Protection Area (SPA) or a Ramsar Site. AA is a process which assesses the implications and potential affects of plans such as the LDF on the conservation objectives of the site, and determines whether or not policies or proposals will significantly affect the integrity of these objectives. The process or stages of AA are outlined below.

Stages of Appropriate Assessment

- 1. Screening.** Determines whether the LDF is likely to have a significant affect on any European sites and whether a full AA is needed. Screening focuses on avoidance and mitigation of impacts.
- 2. Appropriate Assessment.** Determines whether, in view of the site's conservation objectives, the plan would have a significant affect on the integrity of the site. The emerging LDF should be developed to ensure that significant affects on European sites are avoided. This will render Stages 3 and 4 unnecessary.
- 3. Assessment of Alternative Solutions.** Where the LDF is assessed as having an adverse affect on the integrity of a site, alternatives should be examined. Alternatives that avoid adverse affects on European sites should be developed and considered from the earliest stages.
- 4. Assessment where no alternative solutions remain and where adverse impacts remain.** Compensation measures are required for any adverse affects, and are permitted only where the plan would be necessary for imperative reasons of overriding public interest.

Within Wakefield district there is one designated European site, Denby Grange Colliery Ponds SAC. There are no neighbouring Natura 2000 sites within 10 km of the district boundary. Denby Grange Colliery Ponds and New Hall Wood are also a designated SSSI, and are within the Green Belt and Wildlife Habitat Network. New Hall Wood is also designated Ancient Woodland. In consultation with Natural England a buffer zone of 2km has been established around the SAC. The scope of the AA is to determine whether the Central Wakefield Area Action Plan is likely to have any significant effect on the integrity of Denby Grange Colliery Ponds and whether a full AA is needed. The plan covers the geographical area of Wakefield City Centre and the commercial and residential areas immediately adjoining within Wakefield Metropolitan District.

Integrity is described in Circular 06/2005: Bio-diversity and Geological Conservation as: *"The site's coherence, ecological structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of population of species for which it was classified"*.

(1) Natura 2000 sites are those identified as sites of community importance under the Habitats Directive or classified as special protection areas (SPA's) under the Birds Directive 79/409/EEC

2. How the environmental report has been taken into account.

The following table summarises the reason for designating the SAC and the Conservation objectives together with a list of recommendations on how harm can be avoided.

DENBY GRANGE COLLIERY PONDS SAC	
SAC Qualifying Features & conservation objectives	Great crested newt
Key environmental features that support site integrity	Ponds, Ancient woodland, Rough grassland, Terrestrial hibernation habitat
Recommendations on how to avoid harm and support integrity of the SAC	
Avoid proposals which could affect the water bodies e.g. impact on drainage and water quality	
Avoid proposals which could result in damage to habitat or cause disturbance e.g. pollution, inappropriate land use	

Planning policies and proposed uses of land / development that may potentially cause pollution, could have an impact on the water bodies (such as drainage or extraction), or may otherwise damage or disturb the site and its ecology were avoided.

3. How opinions expressed through public consultation have been taken into account.

The Council consulted Natural England whilst preparing the AA screening report for the Central Wakefield Area Action Plan in May 2008. Natural England advised the Council that they agreed with the conclusion that the Central Wakefield Area Action Plan is unlikely to affect the integrity of any Natura 2000 sites, and advised that they did not consider that further Appropriate Assessment of the CWAAP was necessary. Thus there was no requirement to amend the policies in the plan on the basis that there would be no adverse impact on the SAC.

4. The reasons for choosing the plan programme as adopted, in light of the other reasonable alternatives

Denby Grange Colliery Ponds SAC is located approximately 8 kilometres from Central Wakefield and there will be no direct threats from proposals for development. The main threats to the integrity of the SAC are likely to be from changes in management, agricultural or forestry practices within the site or in the surrounding 2km buffer zone. These operations do not often require planning consent and are not within the scope of the Central Wakefield Area Action Plan. The proposals in the Area Action Plan will not lead to any of the operations listed as likely to cause damage to the SAC. There are no proposals that could affect the water bodies or could result in damage to habitat or cause disturbance. Central Wakefield is located downstream from the SAC.

There should be no indirect threats from the proposals or policies in the Central Wakefield Area Action Plan as the development within the Action Plan area will not result

in road building or other infrastructure that may be potentially polluting in the vicinity of the SAC.

When the Council determines planning applications the impact of the development on the integrity of the SAC is considered. The core Strategy and Development Policies Development Plan Documents contain positive policies to protect ecology and the environment. Development which would have a detrimental impact on the integrity of the SAC would not be permitted.

The AA of the documents was carried out in accordance with the tests set out in the Habitats Regulations to produce *Appropriate Assessment Screening Report of the Central Wakefield Area Action Plan Development Plan Document*.

5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

The process by which the significant environmental effects of the Central Wakefield Area Action Plan will be monitored is described in section A5 above. The AA concluded that the final options chosen for the CWAAP are not likely to affect the integrity of the SAC.