

Core Strategy and
Development Control Policies
Development Plan Documents
Initial Statement of
Pre-Submission Consultation



Local Development Framework Preferred Options

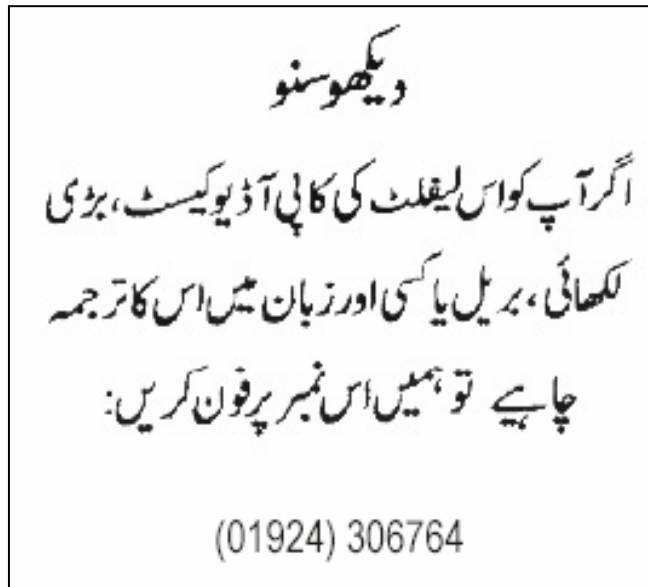
Core Strategy and
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Initial Statement of
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Information

This Initial Statement of Pre-submission Consultation is available to view and download on the Council's web-site at: www.wakefield.gov.uk/ldf. Copies are also available to view at main libraries and Council offices and can be obtained free of charge from the address below or by ringing (01924) 306495.

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1. Introduction

Consultation on the Local Development Framework

- 1.1 Legislation which came into effect in 2004¹ introduced a new type of development plan, known as a Local Development Framework (LDF), and made changes to the way in which plans are drawn up. One of the central aims of the new planning system is to strengthen community involvement in the preparation of development plans. When preparing documents which form part of the LDF local planning authorities must carry out consultation and engage with communities and stakeholders. The minimum requirements which authorities must achieve are set out in regulations².
- 1.2 Authorities are also required to prepare and publish a Statement of Community Involvement (SCI) which explains when consultation will take place, who will be consulted and what will be done to engage different groups and the general public at each stage. The Council and its partners are fully committed to community engagement in the delivery of services and the Wakefield District Partnership already has in place a Community Engagement Framework. A draft SCI which fits into the wider framework was submitted to the Secretary of State in July 2005. A public examination of objections was held in December 2005. After making any amendments made necessary by the examination inspector's report, the Council intends to adopt its SCI early in 2006.
- 1.3 When submitting LDF documents to the Secretary of State an authority must include a Pre-submission Consultation Statement showing how consultation has been undertaken during preparation of each document and how this complies with both the minimum requirements of the regulations and its own SCI.

The Purpose of this Document

- 1.4 This Initial Statement of Pre-submission Consultation relates to the consultation carried out in the early stages of preparing three Development Plan Documents (DPDs):
- Core Strategy
 - Development Control Policies
 - Site Specific Policies and Proposals
- It sets out what was done to consult different agencies, organisations and residents of the District, and how this meets the requirements of Regulation 25 (relating to Pre-submission Consultation) and complies with the relevant parts of the SCI. It also describes how the results of consultation have been taken into account in the next stage of preparing 'Preferred Options Reports' for the first two documents listed above. This statement has been issued to accompany these reports. A full Pre-submission Consultation Statement will be prepared at the next stage when the two DPDs are submitted to the Secretary of State, later in 2006.
- 1.5 Initial consultation was carried out in two stages:
- Early community engagement – summer and autumn 2004;
 - Consultation on issues and options – January to March 2005.

¹ Part 2 of the Planning and Compulsory Purchase Act, 2004

² Regulations 25 & 26 of the Town & Country Planning (Local Development) (England) Regulations 2004

2. Early Community Engagement – Summer and Autumn 2004

- 2.1 The Council began preparation of the three key DPDs listed in paragraph 1.4 in July 2004, in accordance with the timetable set out in the draft Local Development Scheme³. Early engagement centred around making people aware that the Council was starting work on the LDF, outlining what the LDF is and asking them what are the important issues they want it to tackle. The actions undertaken comprised:
- Publishing a leaflet outlining the new LDF process with an attached questionnaire asking people to let us know issues which the LDF should address, ranked in order of priority – July 2004.
 - Setting up introductory LDF pages on the Council's web-site linked to an electronic version of the questionnaire to enable people to submit their response on-line – July 2004.
 - Writing to nearly 300 national, regional and local bodies listed in Appendix A, explaining the LDF, drawing attention to the web-site and enclosing a copy of the leaflet – autumn 2004.
 - Including an item in summer 2004 edition of 'The Citizen', the Council's newspaper delivered to every household in the District – July 2004.
- 2.2 In order to raise awareness amongst Members of the Council and its partners, presentations were made to the following:
- Wakefield District Partnership – July 2004
 - Planning & Highways Committee Members – July 2004
 - Community Assembly – July 2004.
- In addition LDF officers were present at the Wakefield District Partnership 'Vision-On' stakeholder event on 23rd October 2004, to raise awareness and answer questions.
- 2.3 Throughout, those preparing the DPDs worked closely with officers from the Council's Community Engagement team who are responsible for community engagement across the authority. The team distributed LDF leaflets at appropriate events during the summer of 2004.

Response to the Questionnaire

- 2.4 People were asked to rank seven broad topics in order of importance and to state any other issues not covered in the list, to help us gauge where concerns lie. The topics were:
- Providing New Jobs
 - Building New Homes
 - Travel
 - Education and Health
 - Open Space and Heritage
 - Retail and Leisure
 - Improving Design
- 2.5 A total of 89 questionnaires were returned or filled in electronically, a disappointing number given that more than 2,000 were distributed. The following points provide a brief summary of responses:

³ The Local Development Scheme (LDS) identifies which LDF documents the council is preparing and the programme for each. A draft LDS was approved by the Council in September 2004 and, following some changes and consideration by the Secretary of State, the final version became effective from 1st July 2005.

- 'Providing New Jobs' was by some degree the highest ranking issue, suggesting this to be the most important topic for respondents. However, 'Education and Health' was also ranked highly, suggesting this is of general concern.
- 'Retail and Leisure' would seem to be the least important to people as most gave this a low ranking. Some respondents gave 'Building New Homes' a high ranking, however, the majority ranked this of low importance. As might be expected, this subject evokes diverse opinions between respondents.
- Rankings for 'Open Space and Heritage' and 'Improving Design' were fairly high throughout suggesting that respondents generally think they are of some, though not the highest, importance.
- 'Travel' gave the most inconsistent results. Some consider it to be of great importance whilst to others it is of less concern.

2.6 Respondents also had the opportunity to comment on other issues they felt were important. Some responses were not relevant to the LDF, but of those which were, the most common issues raised are summarised below. A number of responses expanded on specific issues listed on the questionnaire.

- Social issues were the most prevalent of those raised. These include better sports and recreational facilities, especially for young people, more visible policing and reduction of crime and social disorder. Issues of community safety need to be addressed in spatial strategies, though, some matters referred to were outside the scope of the LDF.
- Protecting and enhancing the environment, both natural and built, was the second most frequently raised issue. Included within this is the protection of Green Belt and heritage, which are major requirements for the LDF to address. Improvements to the quality of urban areas and public spaces was also of concern to respondents.
- Housing was a recurring concern to respondents particularly the need for affordable housing, upgrading of the housing stock and tackling homelessness.
- Transport was also a recurring theme, with issues such as safety, accessibility and sustainability frequently referred to. These issues will be addressed partly through the LDF but also through the West Yorkshire Local Transport Plan (LTP).

2.7 The important issues identified in responses to the early engagement largely coincide with those in the Council's Community Strategy, *Fast Forward*. The LDF will be closely linked to *Fast Forward* so many of the concerns will be addressed. The views expressed helped to support the decision taken early in the LDF process not to deal in detail with Retailing/Town Centres and Leisure/Open Space in the first batch of DPDs but to continue to rely on policies and proposals in the UDP First Alteration. The results of early engagement were taken into account in the next stage of preparing the DPDs – Issues & Options.

3. Consultation on Issues & Options – January to March 2005

- 3.1 To help people understand the range of matters which the LDF must tackle, the Council published an 'Issues & Options Report' for consultation and comment in January 2005. Its purpose was to explain some of the issues facing the District and the choices which need to be made. It was intended to generate discussion and debate about the problems which the initial LDF will need to address, and the opportunities for dealing with them. To keep the process as straightforward as possible, a single Issues & Options Report was published covering the three DPDs listed in paragraph 1.4 above. It was recognised that not everyone would wish to read the full report so the main issues were spelt out in a summary.
- 3.2 People and groups were invited to comment on the Issues & Options Report, initially between 17th January and 28th February, though the time period was extended to 11th March to allow everyone to have their say. An Initial Sustainability Appraisal was also issued for comment. This looked at the various options put forward in the Issues & Options Report against a range of criteria to assess whether each is sustainable.
- 3.3 Wide ranging consultation on Issues & Options was undertaken. A schedule of the actions and events is set out in Appendix B.

Response to the Issues & Options Report

- 3.4 In all, 1,358 separate comments were received in response to the Issues & Options Report from 114 separate respondents. They included members of the public, landowners, agents, various internal and external agencies, local councillors and Members of Parliament. All the comments have been recorded in full on a database. The following table shows the number of comments received by broad theme:

Housing	402
Economy/ Employment	191
Transport	140
Green Belt	119
General	95
Development/ Settlement Strategy	74
Mixed Use	46
Natural Resources/ Energy	41
Minerals	38
Natural Environment	35
Waste	34
Design	25
Environmental Impact	17
Open Space/ Recreation	15
Historic Environment	14
Landscape	7
Community Safety	5
Retailing/ Leisure	3
Comments relating to multiple themes	15

- 3.5 32 comments related specifically to individual sites within the District and asked for these to be considered for future development. These sites will be assessed, along with other potential sites, to arrive at a list of sites for the Preferred Options stage of the Site Specific Policies and Proposals Development Plan Document, to be published later in 2006.

Response to the Questionnaire

- 3.6 The report was accompanied by a questionnaire where people were asked to agree or disagree with 58 questions posed in the report. Many commented that some the questions posed in the report could not be answered “agree” or “disagree” as the design of the questionnaire required. This criticism is accepted, but a total of 63 responses were received to all or some of the questions. In only three cases did more than half of respondents disagree with the question posed and all these related to housing issues. The options people disagreed with most strongly were, increasing the minimum density for new housing to 35 dwellings per hectare (Q11), encouraging higher levels of house building to support regeneration (Q4) and increasing the maximum proportion for affordable dwellings on a site to 40% or 50% (Q12).
- 3.7 All but 2 of the remaining questions received more than 60% support, there being particularly strong support for Policies to Protect, Conserve and Enhance the Natural and Built Environment, Transport, and Policies to Guide and Control New Development. Housing was the issue that received least support overall.
- 3.8 Under ‘Transport’ a large majority thought the LDF should include a specific policy setting out the basis on which developer contributions to transport improvements will be assessed (Q23) and agreed that specific sites for park and ride schemes (Q26) should be shown on the Proposals Maps.
- 3.9 Policies to promote renewable energy (Q36) received a high level of support as did a farm diversification policy (Q39) and there was also much encouragement for the need of a comprehensive set of policies relating to the use of planning obligations to provide infrastructure and services associated with the new development (Q42).

Summary of Comments

- 3.10 The majority of the comments referred to in paragraph 3.4 above were made in response to the questions asked in the Issues & Options Report. Appendix C summarises the comments made about each question and sets out a brief response about how these comments have been addressed in the Preferred Options Reports. A number of comments were also made about matters not specifically covered in the Issues & Options Report. Several were not directly relevant to the LDF but, amongst those which were, the following main issues were raised:
- provide affordable accommodation in vacant upper floors in town centres;
 - refer to the need for new railway stations at specific locations;
 - identify a strategic waterway network to be promoted for commercial/recreational use and appropriate waterfront development;
 - identify Metro’s public transport interchange points and the Yorkshire Bus Initiative core route corridors as foci for development and investment;
 - refer more to the needs and opportunities in rural areas;
 - include strategic policies on retailing, open space/recreation and environmental protection/ enhancement in the Core Strategy with more detailed policies in other DPDs;
 - provide greater protection for open spaces in urban areas;
 - show floodplains on the LDF proposals maps;
 - identify and protect reserves of coal at shallow depth.

Presentations and Workshops

- 3.11 A number of workshops, briefing sessions and presentations were arranged for specific groups to raise awareness about the LDF and engage them in the process of considering issues and options (see Appendix B). In addition separate meetings have been held with the following organisations:
- Environment Agency – 01/07/05
 - Highways Agency – 05/07/05
 - West Yorkshire Passenger Transport Executive (Metro) – 17/08/05
- 3.12 Each presentation or briefing involved a presentation outlining the purpose of the consultation and the Council's views of the main issues, followed by a question and answer session. Workshops involved group sessions, after the presentation, to discuss a limited number of set questions under the guidance of facilitators. Notes were taken of the workshops and a summary of views expressed at each event is shown in Appendix D. The main points arising were:
- the settlement hierarchy is supported but it needs to be applied flexibly to ensure local needs are met and regeneration takes place where needed;
 - new development should be concentrated in city/town centres but some additional land may be needed in out-of-centre locations to secure investment and new jobs as long as it is accessible by public transport;
 - improved support is needed for the rural economy and provision of services in rural areas;
 - there is a need to raise skill levels and attract quality jobs to retain employment in the District;
 - older employment areas should be protected from new housing development to provide accommodation for small businesses;
 - more new housing could help regeneration but a higher proportion needs to be affordable and a better mix is needed;
 - there should be a balanced provision of employment and housing to reduce the need to travel;
 - development should be located to minimise travel but the accessibility requirements of different types of use also need to be considered;
 - more frequent, reliable and safer public transport services are vital, especially from the South East of the District to job opportunities in other areas;
 - improved, safer, public transport infrastructure, including new railway stations, is needed;
 - there is a need to tackle congestion in parts of the District – through measures such as park and ride;
 - the present Green Belt should be retained;
 - local settlement and landscape character needs to be protected;
 - higher quality design is needed in all new development;
 - open spaces and existing amenities in urban areas need to be protected;
 - greater protection is needed for the District's historic and cultural assets;
 - access to the countryside needs to be improved at the same time giving greater protection to the District's environmental assets;
 - additional services and infrastructure of all types required by new development should be provided by developers through planning obligations;
 - support should be given to the use of sustainable construction techniques and renewable energy sources in new development.

Focus Groups

- 3.13 In addition to the consultation carried out above, the Council instructed The Campaign Company to conduct qualitative research to ensure that business, community representatives and citizens were engaged in the development of the LDF. 5 local businesses, 17 representatives of communities of interest / special interest groups and 29 citizens took part in this qualitative research.
- 3.14 Results on what the key LDF issues should be and options for tackling them were very similar among all groups. What differed was the emphasis given to the issues by each group:
- accessibility issues underpinned responses from communities of interest / special interest groups
 - the need for local people's voices to be heard underpinned responses from citizens
 - promotion and protection of Wakefield's local economy underpinned responses from businesses.
- 3.15 The report of the Focus Groups concluded that all those involved moved from a position where there was little awareness of the LDF or its impact, to a position where they wanted to remain engaged in the process and felt more confident that their long-term priorities would be achieved. The Campaign Company have provided the Council with a full report of the Focus Groups.

Sustainability Appraisal

- 3.16 The Planning and Compulsory Purchase Act (2004) requires a Sustainability Appraisal (SA) to be carried out on Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The Environmental Assessment of Plans and Programmes Regulations (2004) which implements the EU Strategic Environmental Assessment (SEA) Directive, requires SEA of a wide range of plans including LDFs. SEA and SA are very closely linked and have been undertaken as a single process for the LDF.
- 3.17 The first stage of the SA/SEA process was the production of a Scoping Report in December 2004. This set out the scope and framework for the later Sustainability Appraisal Report, determined through a review of planning documentation and baseline information, and established objectives for the SA. Consultation on the Scoping Report was undertaken for a five week period in November and December 2004. The following bodies were consulted:
- Countryside Agency
 - English Heritage
 - English Nature
 - Environment Agency
 - Yorkshire and Humber Assembly
 - Yorkshire Forward
 - Wakefield First
 - Kirklees Metropolitan Council
 - Barnsley Metropolitan Borough Council
 - Doncaster Metropolitan Borough Council
 - Selby District Council
 - Leeds City Council
 - City of Bradford Council
 - Calderdale Borough Council
 - Learning and Skills Council for West Yorkshire
 - West Yorkshire Strategic Health Authority
 - Mid Yorkshire Chamber of Commerce and Industry
 - West Yorkshire Local Transport Plan SEA Team

- 3.18 As a result of responses from English Heritage, English Nature, the Countryside Agency, and Yorkshire Forward, the SA framework was modified for the next stage, the appraisal of options. The changes made are identified in section 9.3 of the Initial Sustainability Appraisal Report.
- 3.19 Using the modified Scoping Report, an Initial Sustainability Appraisal of the Issues & Options Report was carried out. The Initial Sustainability Appraisal Report was published in January 2005 to accompany the Issues & Options Report and was subject to the same consultation arrangements. A total of 19 comments were received about this document. These, together with the Council's response are summarised in Appendix E. The main points arising were:
- baseline data and indicators should include accessibility to open space, sport and recreation;
 - baseline data should include Wakefield Nature Areas and ancient woodland, as well as Countryside Quality Counts information;
 - no reference to design quality in the SA objectives;
 - need to include an LDF objective to protect and conserve Wakefield's historic environment;
 - SA objective 10 need to include reference to 'quality of life';
 - the Council is developing its own indicator for accessibility to natural greenspace which should be used in the SA;
 - transport objectives supported by the Highway Agency but concern about impact of some options on the strategic highway network;
 - employment sites must be attractive to the market, greenfield sites near motorway junctions should be considered;
 - need for sustainable construction and energy conservation must be seen against need to ensure affordability and maintain economic growth;
 - greater clarity needed about options relating development and flood risk and pollution prevention;
 - concern that too much emphasis is given to options supporting regeneration.

4. Moving to Preferred Options

- 4.1 The comments received in response to the Issues & Options Report have been analysed and taken into account, along with the points raised in the Workshops and through the Focus Groups, in formulating the Preferred Options Reports for two of the main development plan documents in preparation – Core Strategy and Development Control Policies. Where appropriate, policies and statements have been included to address the relevant issues. This report is being published to accompany the Preferred Options consultation to clarify how the results of the Issues & Options consultation have been taken into account.
- 4.2 The comments made about the Initial Sustainability Appraisal of the Issues & Options Report will be addressed in the Sustainability Report of the Core Strategy and Development Control Policies DPDs which is published separately.

APPENDIX A

CONSULTATION LIST FOR PRE-SUBMISSION CONSULTATION

(References in brackets are to the Statement of Community Involvement Appendix 2)

Specific Organisations

(SCI Appendix 2.1)

Government Office for Yorkshire and the Humber (GOYH)
Yorkshire & Humber Assembly
The Highways Agency
Yorkshire Forward
The Planning Inspectorate
The Environment Agency
English Heritage Yorkshire Region
Royal Commission on the Historic Monuments of England
English Nature
Countryside Agency for Yorkshire & The Humber
Strategic Rail Authority
Mobile Operators Association
Yorkshire Cable Planning Dept
British Telecom Plc
West Yorkshire Strategic Health Authority
British Gas Transco District Office
Transco District Office*
Yorkshire Electricity YEDL
Yorkshire Electricity
Yorkshire Electricity c/o Turner & Partners
National Power Plc*
Powergen
Innogy plc
National Grid Transco
Yorkshire Water Services Ltd
Knottingley To Gowdall Internal Drainage Board

Specific Organisations (Adjoining Councils)

(SCI Appendix 2.1)

Barnsley Borough Council
Calderdale Metropolitan Borough Council
City of Bradford Metropolitan District Council
Doncaster Metropolitan Borough Council
Kirklees Metropolitan Council
Leeds City Council
Selby District Council

Specific Organisations (Town and Parish Councils within District)

(SCI Appendix 2.1)

General Organisations (Community Groups)

(SCI Appendix 2.2)

Ackworth and District Riding Club
Ackworth Footpath Group
Agbrigg & Belle Vue Allotment Association
Age Concern Wakefield District
AIRE Environmental Group

Airedale Community Forum
Asian Women's Association
Aysgarth Community Association
Barnsley Dial-a-Ride & Community Transport
Brunswick Street Mosque
Castleford & District Naturalists Society
Castleford Heritage Group
Castleford Riverside Community Group
Castleford Town Centre Partnership
Central Jamia Mosque
Chevin Housing Association
Citizens Advice Bureau (Wakefield District)
Coal Industries Social Welfare Organisation
Cohesion Liaison Group for Ethnic Minorities
Community Assembly
Crofton Community Centre
Cutsyke Community Group
Development Initiative for Voluntary Arts (DIVA)
Disability Information and Advice Line Services (DIAL), Wakefield
Eastmoor Community Project
Featherstone Historical Society
Federation of Neighbourhood Watch
Federation of Small Businesses (Wakefield Branch)
Ferrybridge Community Centre
first The Development Agency for Wakefield
Fitzwilliam Community Action Group
Frickley Country Park Regeneration Group
Fryston Local Action Group
Glasshoughton Community Forum
Groundwork Wakefield
Havercroft, Ryhill & South Hiendley Community Partnership
Help the Aged
Hemsworth & District Partnership
Horbury and District Historical Society
Horbury Town Centre Partnership
Horbury, Ossett and Sitlington Regeneration Group
Joint Group Users and Carers
Jubilee Hall Community Centre
Kinsley & Fitzwilliam Community Regeneration Partnership
Kinsley & Fitzwilliam Community Resource Centre
Kirkhamgate Community Association
Knottingley Town Hall Community Centre
Local Mosque Representatives
Lock Lane Community Centre
Lupset Community Centre Association Ltd
Lupset Community Partnership
Markazi Jamia Mosque
Minsthorpe Community College
National Association for the Care and Resettlement of Offenders (NACRO)
Network of Community and Voluntary Groups (VOX)
Next Generation Community Youth Project
Normanton Environmental Society
North Wakefield Community Group
Ossett Historical Society
Ossett Town Centre Steering Group
Pontefract & District Archaeological Society
Pontefract and Castleford Federation of Small Businesses
Pontefract and District Rail Action Group
Pontefract Heritage Group
Pontefract Local History Society

Pontefract Town Centre Partnership
Portobello Tenants and Residents Association
RASA – voice of the refugee community in Wakefield District
RCG Tenants and Residents Federation
Residents Against Toxic Sites (RATS)
Royal British Legion
Royal British Legion, Horbury, Sitlington and Ossett branch
Ryhill Residents Amenity Improvement Development (RRAID) Action Group
SANS (Sharlston and Streethouse) Community Development
Save Horbury Heritage Group
SCOPE
Sharlston Community Centre Management Group
South Elmsall South Kirkby and Upton (SESKU) Community Advisory Forum
South Elmsall South Kirkby and Upton (SESKU) Environment Group
South Hiendley Community Association
South Pontefract Community Partnership
Special Abilities
St Catherine's Church Centre
St Mary's Project
St Peter & St Paul's Community Association
Swaffia Mosque
Thorpe Audlin Community Association
Upton & North Elmsall Community Forum
Voluntary Action Wakefield District (VAWD)
Wakefield & District Environmental Action Forum
Wakefield & District Environmental Action Forum South Kirkby
Wakefield and District Sports Association
Wakefield Asian Community Forum
Wakefield Asian Welfare Association (WAWA)
Wakefield College
Wakefield Mosque Committee
Wakefield Society for the Blind
Ward 3 Partnership
Woodhouse Community Centre
Wrenthorpe Community Association
Wrenthorpe Environmental Society
Yorkshire Mesmac
Zakria Mosque

Government Departments

(SCI Appendix 2.3)

Department for Education & Skills c/o GOYH
Department for Transport c/o GOYH
Department for Trade & Industry c/o GOYH
NHS Executive Northern & Yorkshire c/o West Yorkshire Strategic Health Authority
HM Prison Service Headquarters
Home Office
Defence Estates Ministry of Defence
Office of Government Commerce
Yorkshire & the Humber Regional Housing Board c/o GOYH
Department for the Environment, Food & Rural Affairs c/o GOYH

Additional Organisations

(SCI Appendix 2.3)

Diocese of Wakefield

Wakefield Naturalists' Society
Wakefield District Bio-diversity Group
British Geological Survey
British Waterways North East Region
Commission for Architecture & the Built Environment (CABE)
Centre for Ecology & Hydrology
Church Commissioners
Civil Aviation Authority (Safeguarding Department)
Civil Aviation Authority
The Coal Authority
Commission For Racial Equality
Crown Estates
Council For The Protection Of Rural England
Royal Society for the Protection of Birds (RSPB)
Friends of the Earth
The National Trust
The Woodland Trust
Equal Opportunities Commission
Forestry Commission
Health and Safety Executive
The Home Builders Federation (Yorkshire, North West and North East Regions)
The Housing Corporation
West Yorkshire Learning & Skills Council
West Yorkshire Passenger Transport Executive (Metro)
Arriva Yorkshire
National Playing Fields Association
West & South Yorkshire Playing Fields Association
Network Rail
Network Rail Property
Post Office Property Holdings
Rail Freight Group
Road Haulage Association
Northern Region Freight Transport Association
Transport 2000 (West Yorkshire Group)
Sustrans
English Welsh & Scottish Railways
Freightliner Ltd
G B Railfreight Ltd
Great North Eastern Railway (GNER)
Midland Mainline
Arriva Trains Northern
Virgin Trains
Sport England (Yorkshire)
Women's National Commissions
The Disability Rights Commission
National Gypsy Council

Additional Organisations (Joint Services)

(SCI Appendix 2.3)

West Yorkshire Police
West Yorkshire Police Architectural Liaison Officer
West Yorkshire Fire Service
West Yorkshire Metropolitan Ambulance Service (WYMAS)
West Yorkshire Ecology Service

Additional Organisations (Civic Societies)

(SCI Appendix 2.3)

Pontefract Civic Society
Wakefield Civic Society
Castleford Civic Trust
Normanton Civic Society
Ossett Civic Society
Horbury Civic Society

Additional Organisations (Chambers of Trade and Commerce)

(SCI Appendix 2.3)

Castleford Chamber of Trade
Mid-Yorkshire Chamber of Commerce & Industry Ltd
Horbury and District Chamber of Trade
Normanton Chamber of Trade
Pontefract Chamber of Trade

Other Organisations

(SCI Appendix 2.4)

Council for British Archaeology
English Partnerships
National Farmers Union
Ramblers Association
Yorkshire Tourist Board
West Yorkshire Archaeology Service
Wakefield West Primary Care Trust
Eastern Wakefield Primary Care Trust

WMDC Councillors

(SCI Appendix 2.4)

Members of Parliament and Members of the European Parliament

(SCI Appendix 2.4)

Developers and organisations who have requested to be consulted

(SCI Appendix 2.4)

Citizens who have requested to be consulted

(SCI Appendix 2.4)

APPENDIX B

ACTIONS AND EVENTS DURING ISSUES & OPTIONS CONSULTATION 17th JANUARY TO 11th MARCH 2005

Action / Event	Date
Item in the Council's newspaper, 'The Citizen'.	Autumn 2004 edition
Item in 'Mango' magazine of the Asian community.	February/March 2005 edition
Press release and notices in Wakefield Express Group newspapers.	Weekends of 13 th /14 th and 20 th /21 st January 2005.
Letters / e-mails sent to national, regional and local bodies (see Appendix A) enclosing copies of the Issues & Options Report, the Summary Report, the Initial Sustainability Appraisal and Comments Form. (Complies with the minimum requirements of Regulation 25(1))	13 th /14 th January 2005.
Copies of the Issues & Options Report, the Summary Report, the Initial Sustainability Appraisal and Comments Form made available for inspection at Council offices and main libraries.	Available throughout the consultation period.
Copies of the Issues & Options Report, the Summary Report, the Initial Sustainability Appraisal and Comments Form available to view and download via the Council's web-site.	Available throughout the consultation period.
Briefing for Elected Members, Town Hall, Wakefield.	11 th January 2005
Briefing for Yvette Cooper MP, Constituency Office, Castleford.	14 th January 2005
Workshop with Wakefield District Partnership, St Swithun's Centre, Eastmoor, Wakefield.	3 rd February 2005
Represented at Youth Event, Castleford.	7 th February 2005
Briefing for Town & Parish Councils, Town Hall, Wakefield.	8 th February 2005
Workshop with Elected Members, Town Hall, Wakefield.	15 th February 2005
Public meeting to consider the LDF and other issues - Wrenthorpe Village Hall, Wakefield.	23 rd February 2005
Workshop with Community Assembly, Town Hall, Wakefield.	3 rd March 2005
Presentation to Meeting of Development Directors of Registered Social Landlord Partners, Wetherby.	4 th March 2005
Presentation to Five Towns Steering Group & Castleford Town Centre Partnership, Five Towns Resource Centre, Castleford.	17 th March 2005
Focus Groups of local organizations (1) and local residents (3), plus in-depth interviews with 5 local businesses.	March/April 2005
Report to Wakefield District Cycling Forum.	12 th April 2005

APPENDIX C

LDF ISSUES & OPTIONS CONSULTATION – SUMMARY OF COMMENTS RECEIVED

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
CORE STRATEGY DEVELOPMENT PLAN DOCUMENT		
Spatial Development Strategy		
<p>Question 1: Are the principles proposed the right ones on which to base the Spatial Development Strategy for the LDF; if not, what should the principles be?</p> <p>Question 2: Should the Core Strategy include a settlement classification to help identify where development should take place; if so, is the proposed basis for the classification the right one? Should urban areas be identified specifically?</p>	<p>There was general support for the principles of the proposed spatial development strategy though many who commented want to see the strategy applied flexibly to promote wider sustainable development objectives. Some also expressed a desire to see a more positive approach to sustainable development in smaller communities and rural areas. The role of Wakefield district in the region and Leeds City Region also needs to be recognised. Some of the principles were thought to be of over-riding importance and were really strategic objectives, whilst there were also potential conflicts between principles which need to be resolved. The principle of brownfield before greenfield should be applied in the context of the settlement hierarchy and the need to achieve sustainable development. There was also general support for a settlement hierarchy but there was seen to be a need to make the proposed hierarchy clearer, to apply it consistently and to resolve the relative weight given to the hierarchy vis-à-vis priorities for regeneration.</p>	<p>The spatial objectives seek to recognise and build on Wakefield's role in the Leeds City Region. The distinction between objectives and strategy has been clarified.</p> <p>The preferred option for the Spatial Development Strategy is based on a clear settlement hierarchy which is applied consistently. The strategy allows for development in smaller settlements to meet local needs and create balanced communities. The principle of brownfield before greenfield is applied in the context of the settlement hierarchy – policy CS1.</p>
Housing		
<p><u>The Number of New Houses to be Provided</u></p> <p>Question 3: Should the number of new homes to be provided in the LDF be higher / lower / about the same, when compared with the figure of 950 per annum in the UDP?</p> <p>Question 4: Should the LDF accommodate a higher level of house-building than in the recent past to encourage regeneration?</p>	<p>A slight majority of those responding wish to see a somewhat higher requirement figure than in the UDP First Alteration to meet current levels of demand and to bring about urban renaissance in parts of the District. This was balanced by concerns about the negative impact of high house-building on the environment and infrastructure, the adverse effects on weak housing markets in some areas and the likely increase in commuting to Leeds if new housing is not accompanied by jobs. Some considered that the issue is really a matter for RSS to determine. Whatever the eventual requirement, there was concern that the supply should be more closely managed to ensure that actual house-building does not over-shoot the requirement by a wide margin.</p>	<p>The housing requirement in draft RSS is significantly higher than in the UDP and has been adopted for the Core Strategy Preferred Options Report. Core Strategy policy CS2 will ensure that development is sustainable whilst policy CS3 requires the necessary infrastructure to be provided. Policy CS8 provides for house-building to be monitored closely and land to be released in phases to manage the supply.</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
<p><u>The Location of New Houses</u> Question 5: Should new housing be distributed according to the proposed Spatial Development Strategy and the District's priorities for regeneration and urban renaissance? If not, what approach should be taken to identifying the appropriate scale of development in different parts of the District?</p> <p>Question 6: Should the 'sequential approach' (firstly sites within urban areas, then sites which extend established urban areas and finally sites in transport corridors) be used to identify suitable housing allocations within settlements? If not, what approach should be used?</p>	<p>Responses broadly supported the idea that the distribution of new housing should be based on the spatial development strategy, suitably amended, but that it should be applied flexibly taking account of opportunities and demand. The distribution should be sustainable and be related to the location of jobs. Those responding also generally agreed that the sequential approach to identifying sites should be used, providing the suitability and availability of sites is appraised thoroughly. However, the sequential approach should be applied within the framework of the spatial development strategy.</p>	<p>Core Strategy policy CS6 ensures that the scale of housing accords with the spatial development strategy with the overall intention of meeting needs locally and creating balanced, sustainable settlements.</p> <p>The Core Strategy Preferred Options Report establishes the principles to be applied in deciding housing allocations to ensure that the approach is applied consistently.</p>
<p><u>Windfall Housing</u> Question 7: Should there be a total embargo on windfall housing on greenfield sites or should the size of permissible greenfield windfall sites be limited?</p>	<p>Neither option for greenfield windfall housing was widely supported but it was recognised generally that windfall housing on greenfield sites should be tightly controlled.</p> <p>There was also general concern about the increasing loss of brownfield land, formerly occupied by employment uses, to housing.</p>	<p>Core Strategy policy CS9 aims to ensure that greenfield windfall sites are only used for housing where this would be the best use for the site. Policy CS10 seeks to ensure that windfall housing on brownfield sites does not lead to an oversupply of housing or a shortage of employment land.</p>
<p><u>Housing on Previously Developed (Brownfield) Land</u> Question 8: Should the target for the amount of new housing to be provided on brownfield land in the LDF be higher / lower / about the same, when compared with the target of 61% in the UDP?</p>	<p>The consultation indicated support for a higher target for housing on previously developed (brownfield) land, but some wished to see the current target retained recognising that a higher target may be unrealistic in the longer term.</p>	<p>Draft RSS proposes a brownfield target of 65% for Wakefield. This will be accepted for the LDF though no specific policy is proposed in the Core Strategy.</p>
<p><u>Managing the Release of Housing Sites ('Phasing')</u> Question 9: Is the suggested approach to the managed</p>	<p>Those responding generally accepted the need for a phasing policy but wish to see it applied flexibly and to reflect the genuine sustainability and availability of sites.</p>	<p>Core Strategy policy CS8 provides for the phased release of housing land to ensure the supply is managed in response to monitoring of completions. Sites proposed for housing</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
release of housing sites the right one?		allocations in the Site Specific Policies and Proposals DPD will be fully appraised to ensure their sustainability and availability.
<u>Housing Density</u> Question 10: Should a policy be included to prevent housing proposals which would lead to intensification which is out of character? Question 11: Should the minimum density for new housing be raised to 35 dwellings per hectare to make development more sustainable and help to achieve the average regional benchmark of 38 dwellings per hectare?	<p>Most respondents agreed that a policy to prevent housing proposals which would lead to intensification which was out of character was required.</p> <p>Comments received indicated a mixed reaction to the option of higher minimum densities in housing developments. General support has been expressed to preventing the loss of greenfield land through the use of higher densities, but conversely higher densities might adversely affect the character of a location, result in parking problems/lower amenity standards, and, as targets for brownfield land are being achieved, there is no need to raise densities.</p>	<p>Policy H2 in the Development Control Policies DPD seeks to control development which would lead to over-intensification.</p> <p>Policy H1 in the same document retains the minimum density of 30 dwellings per hectare in policy H18 of the UDP.</p>
<u>Affordable Housing</u> Question 12: Should the requirement for the proportion of dwellings on a site to be affordable be increased from the current maximum of 25% to 40% or 50%?	<p>Responses indicated that the provision of an adequate supply of affordable housing is a growing concern which must be addressed in the LDF. Several responses support a higher rate than the maximum of 25% specified in the UDP, though others are concerned that too high a rate will make schemes unviable and think the rate should remain unchanged.</p>	<p>Core Strategy policy CS12 proposes to increase the maximum requirement for affordable housing to 30% as an interim measure pending completion of the new Housing Needs Survey in 2006. The site size threshold for requiring affordable housing has been lowered in line with Government guidance.</p>
<u>Existing Housing Areas</u> Question 13: What should the LDF do to bring about improvements of the existing housing stock in support of the Council's Housing Strategy?	<p>A number of those responding recognise the need for the LDF to support proposals to modernise and improve the existing housing stock, though some wished to see action which lies outside the scope of the LDF, e.g. more improvement grants.</p>	<p>Core Strategy policy CS14 supports the improvement and renewal of the existing housing stock where this is in line with the spatial development strategy.</p>
Economy and Employment		
<u>Economy</u> Question 14: Are there ways the LDF can help implement the economic strategy for the District other than through allocating land for employment uses and improving the transport network?	<p>Responses considered that an important role for the LDF is to make the District a better place to live and work in order to attract investment by supporting improvements to the environment, the range of cultural and leisure activities, the road network and the quality and reliability of public transport and by providing homes in sustainable locations. It was also considered that the land allocation strategy could better support the development of clusters by encouraging certain types of activity to locate in one area, providing this</p>	<p>Core Strategy policy CS20 seeks to support development and activities, including the development of clusters, which create a dynamic local economy and accord with the spatial development strategy. Other policies seek to protect the environment from inappropriate development and to improve transport links to jobs.</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	approach is applied flexibly.	
<p><u>Employment Land</u> Question 15: How should the scale of employment land allocations be determined – past take up rates or the need to provide jobs or the Council's objectives for economic regeneration or some other method?</p> <p>Question 16: Is the proposed approach to identifying new employment sites the right one? Should the LDF be making specific provision for different types of use, e.g. warehousing / distribution or B1 office uses?</p> <p>Question 17: Should existing employment allocations which appear to be surplus, or which are no longer considered to be sustainable, be considered for alternative uses?</p>	<p>A majority of responses suggested that the future supply should be sufficient to support economic regeneration rather than be based on past take-up rates or a crude assessment of the need to provide jobs. The proposed approach to identifying suitable sites was generally supported as was the need to make specific provision for different types of employment use. The allocation of land for particular activities should line up with the marketing and promotion of the area as an investment destination as well as building on its strengths and the potential for cluster development, e.g. around logistics and cultural and creative industries. The need to review all employment allocations through the LDF process to identify whether they are available, meet market requirements or could be put to a better alternative use, was generally supported. This is in line with national planning policy.</p>	<p>Draft RSS identifies a surplus of employment land across the region and a need to review existing allocations. Core Strategy policy CS15 proposes 265 hectares of employment land, mainly from existing UDP allocations, and includes provision for office, industrial and warehousing use. Sites proposed for employment in the Site Specific Policies and Proposals DPD, including those carried forward from the UDP, will be fully appraised to ensure their suitability and availability.</p>
<p><u>Existing Employment Areas</u> Question 18: Should the LDF differentiate between Employment Zones to be retained specifically for employment uses and those where mixed uses including housing are acceptable? Should the policy applying to Zones to be retained for employment uses be strengthened to retain and protect existing uses?</p> <p>Question 19: Can the LDF help to revitalise some of the larger, older, industrial estates, e.g. Normanton and Langthwaite Grange?</p>	<p>Responses indicate support for a review of Employment Zones to identify those where employment uses should be retained and those where mixed use development is more appropriate. Policies relating to employment zones should not, however, be too restrictive about the types of development which are acceptable.</p>	<p>A review of Employment Zones is being undertaken, the results of which will appear in the Site Specific Policies and Proposals DPD. Core Strategy policy CS19 and Development Control Policies DPD policy EMP1 propose tighter controls on non-employment uses in areas retained as Employment Zones. Policy CS16 encourages employment uses to locate in Employment Zones.</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
Mixed Use Development		
<p>Question 20: Should the LDF include a policy promoting general mixed use development in Wakefield City Centre and Town Centres?</p> <p>Question 21: Do you agree to the use of 'Special Policy Areas' or 'Mixed Use Development Areas' to show where change involving a number of land uses can be expected?</p>	<p>There was general supported the idea of a policy promoting mixed use development in Wakefield city centre and town centres as this would provide flexibility and encourage investment. The use of the term 'Special Policy Area' to denote areas where change may be expected was also generally supported. However, concerns were expressed about the need to specify the types of use which will be appropriate in particular locations and for mixed use development to adhere to other policies e.g. the location of retail development.</p>	<p>Core Strategy policy CS29 supports mixed use development in Wakefield city and other town centres, in Special Policy Areas and in Mixed Use Zones, subject to Development Control Policies DPD policy EMP2. The Site Specific Policies and Proposals DPD will identify the appropriate uses in each Special Policy Area. Proposals must accord with the spatial development strategy and national and regional policy.</p>
Transport		
<p><u>The Location of New Development- Accessibility</u> Question 22: Is the proposed approach to developing accessibility criteria the right one?</p>	<p>The proposed approach to measuring accessibility, based on RSS, outlined in the Issues & Options Report was generally supported in the consultation responses, subject to a number of caveats. Different measures of accessibility are thought to be needed for rural and urban areas. The effects of a proposed development must be taken into account when assessing the accessibility of individual sites. Ensuring sites are accessible must not exclude consideration of accessibility by car. Accessibility criteria must be applied flexibly to take account of market needs to secure inward investment.</p>	<p>New Draft RSS proposes 'origin' and 'destination' criteria for use in assessing the accessibility of sites and facilities. Work is also proceeding to develop and use the new 'Accession' model to measure accessibility. One of these will be used to assess different options for land allocations and in the sustainability appraisal process in the Site Specific Policies and Proposals DPD.</p>
<p><u>Transport Provision</u> Question 23: Should the LDF include a specific policy setting out the basis on which developer contributions to transport improvements will be assessed?</p> <p>Question 24: Should the LDF include a policy stating when Travel Plans will be required, outlining their scope and addressing the mechanisms for delivery and enforcement?</p>	<p>The need for the LDF to set out the basis on which developer contributions to transport improvements will be assessed, to provide consistency and clarity, was generally supported. Contributions should cover improvements to public transport as well as to highways and traffic management. Some expressed the view that contributions should clearly relate to the impact of the proposed development.</p> <p>There was widespread support for the LDF to set out when Travel Plans will be required and their scope. It was also pointed out that monitoring and enforcement are essential to ensure their success.</p>	<p>Core Strategy policy CS21 establishes the principle of developer contributions to highway improvements, whilst policy CS23 does the same for contributions to public transport improvements. Details will be set out in Supplementary Planning Documents.</p> <p>Policy CS21 sets out where Travel Plans will be needed.</p>
<u>Priorities for Transport Investment-Parking</u>	There was limited support in replies for the approach to car	Core Strategy policy CS26 proposes to continue

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<p>Question 25: Do you agree with the proposed approach to car parking provision?</p> <p>Question 26: Should specific sites for possible park and ride schemes in public transport corridors be shown on the Proposals Maps?</p>	<p>parking. The general view is that plans to reduce long term parking, other than at railway stations, should only occur once improvements to public transport services are in place. Also the continuing viability of town centres must be protected.</p> <p>There was widespread support for identifying suitable park and ride sites on the LDF Proposals Maps, and for more long stay car parking at railway stations. Park and ride sites need to be chosen carefully to ensure they will be used and that they themselves do not generate additional car journeys.</p>	<p>the use of maximum car parking standards and the reduction of long stay parking (other than at railway stations) in line with the West Yorkshire Local Transport Plan and RSS.</p> <p>It supports the introduction of park and ride facilities on major public transport routes in association with service improvements and measures giving priority to public transport in the use of road-space.</p>
Green Belt and Protected Areas of Search for Long Term Development		
<p><u>Green Belt Boundary</u> Question 27: Do you agree that only in exceptional circumstances to support regeneration should a change be proposed to the Green Belt boundary in the LDF?</p>	<p>Most responses agree that there is no need for a general review of the Green Belt boundary and that in line with Government policy changes should only be made in exceptional circumstances to meet an identified need. However, some want to see a thorough review whilst others want no changes to the boundary under any circumstances.</p>	<p>Core Strategy policy CS33 proposes that the Green Belt should remain unchanged for the period to 2021 other than in exceptional circumstances where there is an over-riding need to accommodate development which can not be met elsewhere.</p>
<p><u>Protected Areas of Search for Long Term Development (PAS)</u> Question 28: Should land designated as Protected Areas of Search for Long Term Development (PAS) be excluded from the LDF? If so, should existing PAS land be returned to the Green Belt or be left unallocated?</p>	<p>The consultation asked whether the UDP designation 'Protected Area of Search for Long Term Development' (PAS) should be excluded from the LDF and, if so, what should happen to the land. A majority are in favour of returning PAS land to the Green Belt. However, others consider that PAS fulfils an important function in safeguarding the permanence of the Green Belt and point out that the courts have ruled that, as when taking land out of the Green Belt, there have to be exceptional circumstances why land should be added to it.</p>	<p>The preferred option is to retain PAS land in the LDF. Policy SL1 in the Development Control Policies DPD seeks to control development on these sites in a similar fashion to policy OL4 in the UDP.</p>
SITE SPECIFIC POLICIES AND PROPOSALS DEVELOPMENT PLAN DOCUMENT		
<p>Question 29: Do you agree with the types of allocations and designations to be included in the Site Specific Policies and Proposals DPD and on the LDF Proposals Maps? Should other types be included?</p>	<p>The range of designations proposed was generally supported, though some wanted to see PAS deleted (see previous comment) and others wanted more environmental constraints added.</p>	<p>The Site Specific Policies and Proposals DPD Preferred Options Report to be issued in Spring 2006 will include the full range of designations. Some additional environment designations will be proposed e.g. ancient woodland.</p>
DEVELOPMENT CONTROL POLICIES DEVELOPMENT PLAN DOCUMENT		

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
<p>Question 30: Do you agree with the 'generic' approach to framing development control policies, advocated in Government guidance?</p> <p>Question 31: Should the aim be to reduce the overall number of development control policies providing this does not jeopardise the Council's ability to control development properly?</p>	<p>There was general agreement to the proposed generic approach to development control policies though some considered that policies to control specific uses or protect specific types of designation would still be needed.</p> <p>Some, though by no means all, respondents agreed with the aim of reducing the number of policies. Others were more concerned that policies should be clearer and provide a more coherent framework for controlling development.</p>	<p>The number of polices in the Core Strategy and Development Control Policies Preferred Options Reports shows a reduction from the UDP. There may be scope for further rationalisation when the final documents are prepared for submission to the Secretary of State.</p> <p>The introduction of generic development control policies has proved difficult and generally topic based policies are proposed.</p>
Policies to Guide and Control New Development		
<p><u>Mineral Extraction</u> Question 32: How should the District contribute to the supply of primary minerals, recycled minerals and secondary minerals?</p> <p>Question 33: Should the UDP criteria-based approach continue to be used to identify future minerals workings, or Is there a need to identify specific sites or broad areas of search for minerals on the Proposals Maps? If so, what criteria should be used to select any site or area of search?</p>	<p>Those responding to the report generally suggest that shallow coal is a mineral resource which remains accessible and should not become sterilized by new development.</p> <p>The occurrence and exploitation of coal bed methane, particularly in former mine workings, is a potential source of natural energy which has been identified by respondents. There are current agreements and several planning permissions in place for abstraction of coal mine methane for purposes of local electricity generation.</p> <p>Respondents have supported the policy for further use of secondary aggregates provided that that environmental, including residential amenities in the district, are protected.</p>	<p>Core Strategy policy CS38 seeks to protect identified mineral reserves (other than coal), shown on the proposal maps, from development that could result in their sterilisation.</p> <p>Policy CS39 seeks to ensure that Wakefield's contribution to the regional supply of aggregates is maintained and to maximise the use of secondary aggregates.</p> <p>Policy CS40 proposes a presumption against any form of coal mining except where strict criteria are met.</p> <p>Policy MIN1 in the Development Control Policies DPD aims to ensure that the impact of mineral extraction, including the extraction of coal mine methane, is controlled effectively.</p>
<p><u>Waste Disposal</u> Question 34: Should the criteria based policy approach to the identification of waste management sites continue to be the means of promoting new waste management facilities? If not, how are suitable sites to be identified in the LDF?</p>	<p>There were significant issues raised concerning the future management of wastes in the District. Respondents to the consultation on the report indicate support for promotion of the waste hierarchy and access to more re-cycling facilities across the District. There is support for raising awareness on recycling for private householders and commercial sectors; provision of small scale recycling points and 'bring'</p>	<p>Core Strategy CS37 aims to promote and implement the waste management hierarchy, favouring first waste reduction, then re-use, recycling and composting, above disposal. A separate Development Plan Document dealing with Waste will be prepared as soon as practical. It will set out the strategy and spatial context for</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
<p>Question 35: How can the reduction, reuse and recycling of wastes be further promoted within the District at existing waste management facilities or through proposals for new development?</p>	<p>sites; kerbside collection of recyclables; and more composting. New initiatives are needed to incorporate opportunities for recycling into design of new development. There are mixed views about the acceptability of producing energy from waste by mass-burn incineration as a means of waste management but there is little support for continued disposal to landfill.</p>	<p>the provision of waste management facilities for the next ten years in line with the Council's Municipal Waste Management Strategy, and will include development control policies to replace those in the current UDP, as well as site specific allocations.</p>
<p><u>Renewable Energy</u> Question 36: a) What new policies about renewable energy are needed in the LDF? b) Are specific policies needed about certain types of renewable development such as windpower? c) Should policies include specific targets for renewable energy production based on the Sub-Regional Renewable Energy Assessments & Targets Study (SRREAT)? d) Should a new policy be included requiring a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable sources?</p>	<p>There was widespread support for new policies to encourage the use of renewable energy and energy conservation in new development. It was generally agreed that there should be a renewable energy target for the District and that policies should set criteria for the development of renewable energy generating capacity. There was also some support for a policy requiring a percentage of energy used in new development to be provided by on-site generation or from renewable sources, though others opposed the idea.</p>	<p>Core Strategy policy CS36 aims to ensure that efficient use is made of natural resources, including water, materials, daylight and energy, by incorporating conservation measures and by making best use of renewable resources. It supports the development of new sources of renewable energy generation and encourages the generation and use of renewable energy in all new developments.</p> <p>Policies REN1-3 in the Development Control Policies DPD set out detailed requirements including that for larger new development to provide 10% of energy requirements from on-site renewable sources.</p>
<p><u>Development in the Green Belt</u> Question 37: Do you consider that any changes should be made to the Green Belt policies in the UDP First Alteration? Question 38: Do you agree that a new policy is needed relating to extensions and free-standing buildings within the curtilage of existing industrial or business concerns in the Green Belt?</p>	<p>Most responses agreed that there is no need to alter the existing UDP Green Belt policies. However, some want to see much more restrictive policies whilst others want to see a relaxation of policy for certain types of development. The option of retaining the majority of the UDP Green Belt policies was included in the Issues & Options Report and the Initial Sustainability Appraisal identified this approach as generally sustainable.</p> <p>The majority of respondents agreed that there is a need for a new policy relating to extensions and free-standing buildings within the curtilage of existing industrial or business concerns in the Green Belt, although comments indicated that any extensions should be carefully controlled</p>	<p>The preferred option in the Development Control Policies DPD is set out in policies GB1 to GB7. Overall, it is considered that the preferred approach balances the need to meet national planning policy and Core Strategy objectives, with some flexibility for different development proposals.</p> <p>Policy GB5 proposes that extensions and/or free standing buildings within an existing developed site will be appropriate where specific criteria are met.</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
<p><u>Sustainable Development in Rural Areas</u> Question 39: Should the LDF include a policy supporting farm diversification? Should the policy be limited to encouraging the re-use of agricultural buildings for employment uses and tourist facilities and accommodation? Should it differentiate between agricultural buildings within settlements and those that are more isolated?</p> <p>Question 40: Should the LDF include a policy limiting the number of dwellings which will be allowed through the conversion of isolated buildings in rural areas, in the interests of sustainable development?</p> <p>Question 41: Are there other aspects of development in rural areas for which specific policies are needed in the LDF?</p>	<p>in terms of their design, use and impact.</p> <p>There was general support to farm diversification schemes as part of a wider group of measures to aid rural economic regeneration. There was also some support for giving priority to employment and social uses over residential in schemes to convert rural buildings. Concern was expressed about the need to comply with existing policies and to control traffic movements.</p> <p>In line with the strategy, there was general support for the proposal to limit the number of dwellings to be allowed through the conversion of isolated buildings in rural areas, in the interests of creating sustainable settlements.</p> <p>A number of respondents indicated the need for a policy to retain local services, including village pubs, shops and post offices, where the loss would cause an unacceptable reduction in local services, unless it can be demonstrated to be not viable financially.</p>	<p>Core Strategy policy CS17 sets out the strategic approach to the rural economy and supports the re-use of previously developed land and suitable redundant rural buildings for local businesses, farm diversification schemes and tourism related initiatives. Policies EMP3-4 in the Development Control Policies DPD set out detailed requirements. Proposals should not conflict with Green Belt and environmental policies.</p> <p>Core Strategy policies CS1 and CS6 propose that in villages, smaller settlements and rural areas priority be given to the re-use of existing buildings for employment and community uses before residential. CS6 also seeks to control the scale of housing development in rural settlements.</p> <p>Policy CS18 aims to resist the loss of existing employment sites to non-employment uses within local service centres, villages, smaller settlements and rural areas unless specific criteria are met. Similarly, policy CS30 aims to protect against the loss of rural community facilities and services unless alternative provision is made.</p>
<p><u>The Use of Planning Obligations</u> Question 42: Do you agree to the need for a comprehensive set of policies relating to the use of planning obligations to provide infrastructure and services associated with the new development?</p> <p>Question 43: Should the LDF include a specific policy</p>	<p>There was support for clear and comprehensive policies in the LDF setting out where developer contributions will be required through a planning obligation.</p>	<p>Core Strategy policy CS3 sets out the types of infrastructure, facility and service where developer contributions may be required as a result of their development proposals. Other policies in both the Core Strategy and Development Control DPDs make reference to specific occasions where planning obligations may be used e.g. public transport improvements, education and other community facilities, affordable housing, open space.</p>

TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
requiring developers to contribute to the cost of education provision and setting out how contributions will be assessed?		
Policies to Protect, Conserve and Enhance the Natural and Built Environment		
<p>Question 44: Do you agree with the proposed structure for policies to protect, conserve and enhance the natural and built environment?</p>	<p>Nearly all those who commented agreed with the proposed structure, however, several comments also confirmed the need to ensure that some specific policy areas had detailed policies.</p> <p>There is considerable concern that the environment is adequately protected from risk of flooding, pollution and other hazards. Protection of the amenity of residents and occupiers of development is of equal concern.</p> <p>There was considerable support and a general consensus on the importance of protection and enhancement of the District's historical assets, its wildlife, habitats and the natural environment generally, and the need to ensure policies are adequate.</p>	<p>The preferred option in the Core Strategy and the Development Control Policies DPDs is to update and, where necessary, introduce new policies to strengthen protection, enhancement and management of historic and environmental assets and to protect residents and occupiers from risk of flooding, pollution and other hazards.</p> <p>Core Strategy policy CS34 aims to protect, enhance and manage the District's historic and natural environment, its landscape character and bio-diversity, including the proposed Wildlife Habitat Network. Policy CS35 seeks to ensure that development proposals do not cause an unacceptable adverse impact on existing and future occupants, the wider community and the environment.</p> <p>The preferred options for the site Specific Policies and Proposals DPD will include statutory and non-statutory designations, plus new designations like Wakefield Nature Areas, ancient woodland and Wildlife Habitat Networks.</p>
<p>Question 45: Do you agree that new policies are needed to:</p> <p>45a: Improve control over advertisements and shopfront design affecting both Conservation Areas and Listed Buildings?</p>	<p>The majority of those responding agreed that new policies were required to improve the control over advertisements and shopfront design affecting both Conservation Areas and Listed Buildings.</p>	<p>The preferred option is to include a new policies, BED7 and 8, in the Development Control Policies DPD to improve control of shopfront design and advertisements in sensitive locations.</p>
<p>45b: Improve the quality of both the design of the built environment and landscape design in</p>	<p>The importance of good design, the need to protect and enhance visual amenity, the need to raise the quality of design in new development to improve the District's built</p>	<p>Core Strategy policy CS4 stresses the need for high quality design in all developments. Policies BED 1-8 in the Development Control Policies</p>

Initial Statement of Pre-Submission Consultation

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new development?	environment and the need to ensure communities are safe, were stressed in responses to the consultation.	DPD establish detailed requirements.
45c: Ensure that new developments incorporate safe and secure design to improve community safety?	There was support for policies to ensure that new developments incorporate safe and secure design to improve community safety. However, security requirements must be balanced against the need for high quality design and accessibility and must ensure that the individuality of schemes is not lost through overly prescriptive requirements and standardised solutions.	Core Strategy policy CS32 establishes the principle that all development and transport proposals must take account of the need to reduce the opportunities for crime and promote safe living environments. Policy BED3 in the Development Control Policies DPD sets out the matters which have to be addressed in development proposals.
45d: Guide the location and design of telecommunications equipment?	There was agreement that new policies are required to guide the location and design of telecommunication equipment, to ensure that telecommunication development takes place where appropriate and that amenity is protected.	The preferred option is to include a policy, TEL1, in the Development Control Policies DPD to guide and control the location of telecommunications equipment.
45e: Protect and enhance 'Wakefield Nature Areas' and areas of ancient woodland?	Several respondents supported the option for additional policies and designations, one suggested that non statutory or local designations should not receive specific protection.	Statutory and non-statutory sites of local importance, together with countryside features which provide wildlife corridors, linking one habitat to another, help to form a network to maintain the current range and diversity of flora, fauna, geological and landform features and the survival of important species. Wakefield Nature Areas and ancient woodland are integral components of the proposed Wildlife Habitat Network. Policies NAT1-3, 5 and 6 in the Development Control Policies DPD provide specific criteria to be met in development proposals affecting these areas.
45f: Protect the character of the countryside and other open landscapes?	Some of those replying supported new policies for the protection and enhancement of the landscape, countryside and open space for its ecological and amenity value in both rural and urban areas, others disagreed stating that local designations are inappropriate.	Policy NAT9 in the Development Control Policies DPD seeks to ensure that development within the countryside and areas of open urban green space contribute towards the protection and enhancement of the character of the landscape, it's biodiversity, and where appropriate, the recreational quality of the area.
45g: Reduce the amount of light pollution caused by new developments involving floodlighting?	Some agreed that new policies were required to reduce the amount of light pollution caused by new developments, though some concern was expressed at the lack of national	Policy EIC8 in the Development Control Policies DPD requires controls to be put in place to protect dwellings and other sensitive property,

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TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
	planning guidance on this issue.	the rural night-sky, observatories and road users from the intrusive effects of the light pollution.
45h: Control new development in Air Quality Management Areas and to ensure that new development throughout the District does not result in unacceptable levels of air pollution?	Those replying agreed that policies are required to control new development in Air Quality Management Areas and to ensure that new development throughout the District does not result in unacceptable levels of air pollution. Some wanted to see no new development where air quality is below minimum standards.	Policy EIC6 in the Development Control Policies DPD proposes that development that would result in an increase in pollution levels to the detriment of health, environmental quality and amenity should be necessary. Where applicable, appropriate mitigation measures will be required.
45i: Encourage sustainable construction and energy conservation in new development?	Those replying agreed that policies are needed to encourage sustainable construction and energy conservation in new development	Core Strategy policy CS36 requires that efficient use is made of natural resources in new development through their layout, design and construction, by incorporating conservation measures and by making best use of renewable resources. Policy REN3 in the Development Control Policies DPD proposes specific criteria to be considered in assessing proposals.
45j: Others?	Respondents proposed that new policies to control noise, to protect vulnerable species, to prevent development in areas of flood risk and to protect small open spaces in urban areas.	Policies are proposed in the Development Control Policies DPD to protect existing and future occupants from the adverse effects of noise pollution (EIC7) and flood risk (EIC2), and to preserve species protected by law (NAT2). Existing UDP policies protect open space. These will be replaced in a future DPD.
Question 46: Do you agree with the option to delete the Green Corridors and replace them with Wildlife Corridors together with appropriate policies to protect wildlife habitats?	Mixed views were expressed about the option to replace the UDP 'Green Corridor' designation with a 'Wildlife Habitat Network'. Some considered that Green Corridor policies had not been implemented adequately and were concerned that the new approach would be weakened by removing reference to outdoor recreation. Some wanted to see both designations applied.	The proposed Wildlife Habitat Network designation is intended to replace Green Corridors to strengthen protection of biodiversity, avoid confusion over the term "corridor" which is used to define transport links, and to separate ecological conservation from recreation as these can sometimes be in conflict. To have both Wildlife Habitat Networks and Green Corridors in conjunction as suggested would cause unnecessary duplication and confusion. Policy NAT4 in the Development Control Policies DPD proposes that within the Wildlife Habitat Network development that would adversely affect its integrity and value or the movement of flora

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TOPIC	SUMMARY OF COMMENTS	COUNCIL'S RESPONSE
		and/or fauna species will only be permitted in exceptional circumstances. Development proposals should make provision for the retention of the network and protection of its wildlife links and ecological conservation value.

APPENDIX D

ISSUES & OPTIONS CONSULTATION – SUMMARY OF WORKSHOPS

Summary of Wakefield District Partnership Workshop 3rd February 2005

1. Settlement Strategy – Where should most new development be located?

Settlement hierarchy: Locate development in the main urban centres such as Wakefield, Castleford, Normanton and Pontefract. Need to consider the District in wider context of links to Leeds and Barnsley. In the south east improving deprived areas and developing under utilised assets may be more important than size of settlement when considering where new development should be located. Consider grouping smaller towns together such as the SESKU area which has a distinct urban area surrounded by countryside with a cultural identity. Consider whether parts of the District would benefit from an influx of new communities to enhance cultural diversity? (Not just “better off people” moving into deprived areas but also ethnic variety which makes areas more cosmopolitan). Need to consider rural economy and rural housing needs also.

Accessibility: Development should be located to minimise travel – sustainable communities. Consideration must be given to the accessibility of different forms of development – some may need to be located close to motorway junctions – idea of ‘business clusters’. Good public transport connections are essential i.e. rail and bus. Better cross District transport is needed. Need to encourage investment in transport. There are difficulties not only with accessibility to services but employment, the types of work available and commuting.

Facilities and Infrastructure: Availability of services within settlements e.g. schools, shops need to be considered, must be sufficient to meet needs of new households. Development should be focused on existing infrastructure in existing settlements. In smaller settlements need local businesses serving the community, small business units for local jobs/training, and development to support ‘local needs’ or to support regeneration. Concerns that limited development may stifle regeneration. Need to provide services e.g. schools and health services through use of planning obligations.

Regeneration and use of brownfield land: Priority should be to use brownfield land, in the Urban Renaissance areas of Wakefield City, the Five Towns and local priority areas in the south east part of the District. Housing led regeneration, renewal/replacement of dwellings with a mix of types and choice of transport is more important than size of settlement. In Castleford the key river & waterways system should be used to aid regeneration.

Impact on amenity: The idea that sustainable development should mean that housing is located close to employment not necessarily good, as industrial uses can be detrimental to residential amenity and attractiveness of living in that area.

2. Economy and employment - In what ways can the LDF support economic regeneration?

Allocation of land: It is important that development is concentrated in centres rather than people being drawn away to out of town locations because of lack of variety and services. Need to make town centres more attractive to draw people and employers in. Concentrate development in regeneration areas. Need to balance against areas which are not priorities for regeneration but have problems of inadequate shops/facilities, e.g. Ossett. Development of brownfield land should be a priority but balance is required. Major employment generation may justify greenfield development. Need to reserve land in employment allocations for

small businesses/small units. Economic development is not dependant on size of settlement but its links to transport and services. New jobs are now town centre office based rather than out of town and we need to manage the return to the town centres through urban renaissance. In town centres clusters of businesses generate skills and growth e.g. solicitors and estate agents. Some places in Wakefield District have a distinctive cultural identity, can this be developed to attract investment?

Mix of jobs: Try to keep workers in Wakefield District by having adequate local employment and services which will then contribute more to the local economy. Need to consider local skills base, there is a need to develop this to ensure employment opportunities for local people. Need to have flexibility in dealing with employers – balancing investment with job creation, which in turn leads to further investment. Need to improve the quality of jobs in the District. Skills training should be located in town centres to ensure accessibility. Need to create local jobs in smaller settlements as well as “city jobs”.

Regeneration of older sites: Need to protect employment areas. Contamination can be a problem. Older sites may have to be redeveloped for other uses if they are unsustainable. Need to ensure there is adequate provision for small business – “balanced portfolio”.

Transport and accessibility: Problem of warehousing in peripheral locations, need to improve public transport so workers can get to work. Employers should be encouraged to contribute to providing transport – agree provision in Travel Plans. Need for Metro to provide better information on travel links. The motorways and road network are the main factor determining location of employment at the moment e.g. Europort but need to consider alternatives as these sites are developed.

Mixed uses: Generally supportive of mixed uses. Good design is required and employment density policies required preventing warehouse/sheds next to housing.

3. Housing - How many new houses should the LDF provide for?

Numbers of new houses: In relation to scale of new housing it was felt that Wakefield could benefit from high growth as the District is in a good strategic location and is probably going to see demand rising and an increased amount of housing in long term. Need to consider not only how many houses are needed but what types of housing are required to meet demand.

Housing Mix: The LDF needs to make provision for all housing sectors. More affordable housing is required. A variety of housing accommodation is required. Higher density flats provided as ‘affordable accommodation’ are not always appropriate e.g. for retired people and people with children. ‘Special needs’ housing is also needed e.g. safe accommodation for victims of violence.

Amenity: Housing densities – more space about dwellings required. Development needs to be in sustainable locations with adequate services. Developers should contribute towards community facilities.

Regeneration: Housing policy should address market failure areas – linked to settlement strategy. Housing can lead regeneration in some town centres.

4. Transport - How can the LDF help to improve accessibility to jobs and services?

Volume of traffic: Need to reduce volume of road traffic. Group agreed with policies requiring traffic impact assessment and travel plans.

Public transport: Need reliable alternatives to cars. Need for integrated bus/rail services. Need better public transport to community facilities. Safety and security of public transport should be a priority. Developers should make contributions to public transport and community buses. Where it is anticipated that settlements will expand measures to develop public transport should be implemented.

Accessibility: Transport linkages should be encouraged in line with Regional priorities and local settlement links should be made within this. Provide new links and improve transport to jobs and services e.g. hospitals. Accessibility and public transport for young people is an issue – safety is an important consideration.

Car parking: Extend parking at South Elmsall railway station and improve service into Wakefield and Leeds. Introduce Park and Ride into Wakefield City. Identify Park and Ride sites on the LDF plans.

5. Environment – Is there a need for new policies/designations to protect the built and natural environment?

Green Belt: Regeneration objectives can be restricted by Green Belt, preventing growth. Consider that some flexibility to Green Belt is required. Use of green belt for leisure is increasing and new infrastructure and improved links between the communities/settlements within the Green Belt is needed. There was a general consensus that development should be permitted in Green Belt only in exceptional circumstances.

Environmental protection and enhancement: Need for more trees, open space and playing fields. The environment needs enhancement to better reflect the character of the countryside within the District. Air Quality is becoming a major issue, especially in town centres, and concentrating development in town centres will make problem worse.

Amenity, design and accessibility: Develop access to the countryside which is an important asset of the District. Improve the quality of building and landscape design, particularly employment/mixed use developments close to motorway and transport corridors. Resist pressure to release more land in these locations. Need more emphasis on the quality of design, materials and site layout. Sustainable construction should be a priority. Create civic spaces offering good quality environments within towns.

Summary of Elected Members' Workshop 15th February 2005

1. Settlement Strategy - Where should most new development be located?

Settlement hierarchy: The north of the District is accessible to Leeds unlike the south east area. Smaller towns need to be more self sufficient in terms of services, shops etc. Some settlements need regeneration, particularly infrastructure and employment, e.g. Ossett and Normanton.

Location of development: New development should be located in the main urban areas such as the Five Towns and south east area, along public transport corridors and in the Regeneration Priority Areas such as the coalfield areas. Local needs should be provided for in the smaller settlements but development should be proportionate to the size of the population to allow the settlements to grow relative to each other. Brownfield sites should be developed before greenfield sites. Large scale development is inappropriate in villages without services such as schools and shops. There is a need for affordable housing in most settlements. In small settlements additional housing is required to meet local needs. However there should be no development in some small settlements to protect their character. Concentrating all new development in the inner city is also causing problems such as congestion. There are concerns that Normanton and Ossett are becoming commuter towns for Leeds and are losing their sense of identity.

Facilities and Infrastructure: Services are required in smaller settlements and new housing can help sustain local business such as post office or village shops. Use Section 106 agreements to provide for additional local facilities such as schools/transport/open space/community facilities.

Transport: Need to reduce reliance on cars by improving public transport linking Wakefield with other settlements in the District. In some areas new development is causing road congestion.

Design: In inner Wakefield a lot of large houses are being converted into flats and hostels but the community needs to be more balanced e.g. more family housing. There is a lack of open green amenity space in Wakefield.

Green Belt: Green Belt should be protected from development as it helps to protect the identities of individual settlements. Development within smaller villages should not encroach into the Green Belt.

2. Economy and employment - In what ways can the LDF support economic regeneration?

Location of employment and allocation of land: Allow development in M1/M62/A1 corridors. Opportunities at Prince of Wales and Glasshoughton, but want quality jobs. New employment should be in or adjacent to existing settlements, preferably in main centres. Businesses and industry should be located in appropriate locations, i.e. only B1 uses in or adjacent to residential areas. Greenfield sites and Green Belt land should not be developed until existing brownfield sites have been developed. Larger sites that may come forward such as Ferrybridge Power Station and South Kirkby Colliery should not be developed in a piecemeal manner.

Need to retain employment sites: Existing industrial estates and employment sites should be retained for employment uses and not released for residential development. Employment

Zones should be protected for small businesses e.g. Horbury Bridge. Start-up units are required rather than more new housing.

Regeneration: Need to tie regeneration in with urban renaissance work. Redevelopment can improve environment for everyone.

Mixed Use: Allow mixed use if it can demonstrate a positive contribution to the viability of the wider area e.g. improve quality of life, better business prospects. Mixed use is appropriate in Pontefract and Castleford. A mix of housing and employment uses is a traditional situation.

Transport and accessibility: Transport, especially public transport, is vital. Improve links to employment areas and Leeds. Additional transport links should be provided to areas where new employment is being created. At large employment sites developers should be encouraged to fund bus services or large businesses could set up their own employee bus service. There is a need for integrated transport e.g. developers contributions, Travel Plans. Sites should also be accessible by cycling and walking.

Mix of jobs and skills: Although employment in the District has improved markedly many jobs are low paid. There is a need for good quality jobs for local people. There are good employment opportunities in adjoining cities such as Leeds, and a high volume of commuting takes place. Need to improve skills of workers in Wakefield to attract employers into the District, assisted by good environmental quality and education.

3. Housing – How many new houses should the LDF provide for?

Car parking and transport infrastructure: There are problems with parking and road structure in some areas. Parking standards are unrealistic on some residential developments and more off road parking is required within urban areas. Developers should contribute to highways and public transport improvements through Section 106 agreements.

Numbers of new houses: There was general agreement that more new housing was required, and should be above the current figure set out in the RSS.

Housing mix: Mix and affordability is as important as numbers of new dwellings. There is high demand for property in Wakefield, insufficient numbers and an imbalance in mix mean that local need is not being met despite the high build rate. Affordability is a big issue with large numbers of people waiting for social housing. Need affordable accommodation for key workers such as nurses. There should be a range of types of affordable housing e.g. flats and family dwellings, old people's accommodation and units for disabled people. The percentage of affordable housing within new developments should be higher than the 25% required within the SPG. Need smaller developments of social housing distributed around the District.

Location of housing: Housing development should be located where employment is accessible, particularly by public transport. The LDF should identify new housing sites which have good access to the urban centres. Over 75% of dwellings should be built on brownfield land. New Housing in the south east of the District could help in regeneration but may increase commuting.

Amenity and design: The character and amenity of the area in which development is proposed should be protected. The density of new residential development should be appropriate to the locality and adjoining uses and its design should be sympathetic and appropriate to the area.

4. Transport - How can the LDF help to improve accessibility to jobs and services?

Volume of traffic: Congestion is now a serious problem in Wakefield and need to consider banning traffic from parts of the city and introducing Park and Ride schemes. Transport should be planned to serve locations where new development is proposed. More investment in infrastructure is needed.

Car Parking: Plenty of parking encourages reliance on cars, need to take measures to actively discourage cars such as banning them from parts of Wakefield centre. Cheaper parking fees should be introduced at rail and bus interchanges.

Public Transport: Need to reduce reliance on cars by improving public transport linking Wakefield with other settlements in the District. Transport links need improving to aid development of the south east regeneration areas. Bus services need improvement if people are to use them regularly. Expand yellow school bus scheme. Re-open rail links between Wakefield and outlying settlements e.g. stations in Hemsworth and South Kirkby Colliery. Ribbon development should not be supported just because the sites are on good public transport corridors.

Pedestrians and cycling: Wakefield city centre is very compact, need to make pedestrians a priority, get rid of badly designed subways and expand pedestrian areas. Improve cycling provision e.g. more bike storage in town centres.

Accessibility: Local community transport initiatives should be supported. More local facilities in local centres are required to reduce the need to travel to larger settlements for goods and services. New development proposals should be submitted with Travel Plans/Assessments and consideration should be given by developers/employers in providing Metro cards and independent bus services/car sharing schemes.

5. Environment – Is there a need for new policies/designations to protect the built and natural environment?

Green Belt: There should be no change to the Green Belt boundary. Some small areas of Green Belt could be removed to help manage certain areas such as allotments. Need for flexibility over Green Belt, but only in exceptional circumstances.

Environmental protection and enhancement: Need to protect valuable open green spaces especially in urban areas. Need for play areas for all ages in residential developments. Need for robust drainage policy and flood protection. The planting of more trees, especially woodland, should be encouraged. Promote the natural, historic and cultural heritage of Wakefield District. If Green Corridor is to be deleted from the LDF some areas of land should be designated to protect landscape. Protect areas of valuable wildlife habitat

Summary of Community Assembly Workshop 3rd March 2005

1. Settlement Strategy – Where should most new development be located?

Settlement hierarchy: There was general support for development in existing settlements to make the best use of resources and facilities, in particular development should be concentrated in main settlements such as Wakefield City, the Five Towns and South East Coalfield. It was difficult to define ‘smaller settlements’ – land availability is an issue in these places. Some development is needed in non-regeneration priority areas like Ossett and Horbury.

Facilities and infrastructure: Need to provide local facilities appropriate to the scale and type of development e.g. schools, doctors surgeries etc. Need to look at social/welfare needs in development, especially sporting and other activities for young people. Transport infrastructure links need improving, for example in the coalfield communities. Development should only be allowed where existing road capacity and infrastructure can cope. Developers should contribute to new infrastructure provision.

Use of brownfield land: It was agreed that previously developed sites should be developed before greenfield sites. Brownfield land in Green Belt should be re-designated. Land which is not well used should be redeveloped.

Need to balance housing and employment. Concerns were expressed about the availability of employment land in Wakefield. Already have significant development at M1 Junctions 39, 40 and 41 and Paragon Business Park. Further releases of land at Motorway junctions should be resisted. Employment opportunities should be well located in relation to housing and linked by public transport services.

Impact on amenity: Need to consider the effects of new development on existing residents e.g. traffic. Need to ensure that the original planning conditions attached to planning approvals remain in place and are effective in controlling the resulting development. Concerns were expressed about amount of new development around Wakefield and in the northern part of District in general which were considered to be ‘overdeveloped’ by some.

2. Economy and Employment – How can the LDF support economic regeneration?

Allocation of land: The need for more employment land and buildings along the motorway corridors and transport junctions was questioned given the unused capacity, there appears to be an over-provision. People do not want to see any more warehouses – especially in motorway corridors.

Mix of Jobs: Not convinced that the types of jobs being created on new sites are generally addressing the requirements of former mining communities. Need to relate employment to local skills and providing jobs for local people. More workshop/clusters for small business, with emphasis on training are needed.

Need to retain employment sites. Concerns over loss of employment land to housing. Mixed use schemes are supported but there should be restrictions on types of uses, which in turn needs to be enforced.

Regeneration and older sites: Use brownfield land for employment. Concerns expressed about the reuse of employment sites by multiple users when single, large occupiers vacate e.g. Slazenger site in Horbury, where there is poor access and buildings are in poor condition. Need to secure development on vacant sites like the former Wakefield Power

Station. Want clean and tidy employment zones. Consider use of Town and Country Planning Act Section 215 powers.

Transport and Accessibility: Need better roads between centres in the District. Need improvements to local roads to link employment sites to areas where people live – accessibility. Need improvements to public transport to allow people to access jobs. Need to ensure developers contribute to transport improvements – Travel Plans, Section 106 agreements.

3. Housing – How many new houses should the LDF provide for?

Numbers of new houses: It was considered that the housing requirement should be reduced. The need for more houses was questioned. Housing allocations need to be more flexible.

Housing mix: Need for a greater mix and range of different types, sizes and tenures, not just flats but accommodation for elderly people and families. Need more affordable starter homes. Need to increase the proportion of affordable housing in new developments, there is concern that we do not achieve the current target of 25%. Can Wakefield District Housing give priority to housing people who work in the District?

Redevelopment: Support for new housing in regeneration priority areas. Support for new housing on previously developed land in preference to greenfield land.

Amenity: Need more emphasis on design. Policies need tightening when determining the impact on an area. Higher density of housing on brownfield and redevelopment sites can cause problems. New design guidance is required – design themes/statements?

4. Transport – How can the LDF help to improve accessibility to jobs and services?

Volume of traffic: Problem of traffic gridlock identified in North Wakefield. There are problems with interconnections away from major routes.

Public Transport: Promote public transport and increase investment. Need improvements as current services are not good enough. Investment in rail stations is required, suggest a new station at Horbury and improvements to Wakefield Kirkgate.

Accessibility: All new development should be built in accessible locations. Support for provision for walking and cycling in new development. A community transport system is required. Support for Transport Assessments and Travel Plans.

Car Parking: Need to deal with the car parking issues associated with increased numbers of people working in town and city centres. Park and Ride could be a solution. City Centre Travel Plan/solutions are required.

5. Environment/Green Belt – Is there a need for new policies to protect the built and natural environment?

Environmental protection and enhancement: Support for safeguarding the environment. Need to protect the natural environment and preserve what we have in the District. Bad development can ruin the environment. Need to ensure that what is built is attractive. Developers need to take good design and protection of the environment on board to a greater degree.

Sustainable construction and renewable energy: Support for sustainable construction and renewable energy.

Green Belt: Support for Green Belt. Smaller, mixed use, sustainable projects with good transport improvements could be acceptable. Previously developed sites could be used but mixed opinion on this issue as it could also allow encroachment. Policies to allow for farm diversification are needed – benefits local economy. Need to maintain gaps between settlements.

APPENDIX E
INITIAL SUSTAINABILITY APPRAISAL CONSULTATION –SUMMARY OF COMMENTS RECEIVED

Comment Ref	Name	Organisation	Comment (Summarised by Wakefield MDC)	Council's Response
ISA001	Mr H Peterson	Sport England	1. Leisure & Recreation levels of employment would be useful indicators. 2. Appraisal does test options with regard to open space, sport & recreation. 3. LDF Objective 12 cannot be assessed until post 2007. 4. Yorkshire Plan for Sport indicators could be used. 5. 'Active Places' will provide future baseline data on Sport and Recreation facilities. 6. SA7 should be expanded to provide a relative value to potential benefits using specific sport and recreation indicators.	1. Indicator will be considered for inclusion in SA framework under either SA1 or SA7. 2. No action needed. 3. It is assumed that this comment refers to the compatibility assessment of LDF12 against SA8 and SA12. In general terms, the SA considers short, medium and long term, and 2007 is considered short term in the life of the plan. 4. Target in Table 1 to be added. 5. Baseline data in the SA Report to include "Accessibility to open space, sport and recreation" once the "Active Places" database is available (if before publication). 6. The indicators identified will be considered in an eventual Leisure & Recreational DPD.
ISA002	Delphine Pouget	West Yorkshire Ecology Service	1 & 2. Table 2 should include Wakefield Nature Areas. 3. Option DC20 should provide opportunity to expand or create new Natural Areas.	1. Wakefield Nature Areas will be added to Table 2 (and Appendix E: Baseline Information) 2. Ancient Woodland will be added to Table 2 (and Appendix E: Baseline Information) 3. This comment supports the last sentence of the DC20 Option Conclusions.
ISA003	Graham Roberts		1. No reference to design quality.	Design quality could be included in LDF10 "Create an environment that promotes and maintains a good 'Quality of Life' "(see comment ISA010). Support for good design and public art is included in Policy CS4 of the Core Strategy Preferred Option Report and Policy BED1 of the Development Control Policies Preferred Option Report.
ISA004	Graham Titchener	Highways Agency	1. Overall, SA is well ordered, thorough and findings sensible, though limited review of planning policy. 2. Highway Agency policy should be taken into account. 3. Investment in the transport network would need careful consideration with the Agency. 4. Concerns with using RES targets and possible impact on highway network. 5. Agency would oppose large 'distribution' sites on SHN corridors. 6. Agency would like involvement in Air Quality Action Plans. 7. Other key objectives will need to consider impact on SHN. 8. Transport objectives supported by Agency. 9. SD3 and EC11 have potential to detrimentally affect the SHN.	1. The purpose of the review of plans, policies and programmes is not to provide a detailed analysis, but to highlight the main environmental objectives of the other plans which are of relevance to the LDF and most likely to influence the SA. 2. No action, see points 3 to 8 below. 3. The objectives reported in Table 1 derive from the review of plans, policies and programmes. The Local Transport Plan (LTP) would be the planning document where issues linked to the investment in the network would be considered in more detail. Wakefield MDC will provide inputs into the West Yorkshire LTP, and the Council will report this comment to the LTP authority. 4. The concerns of the Agency are dealt with within the SA

Comment Ref	Name	Organisation	Comment (Summarised by Wakefield MDC)	Council's Response
				<p>Framework in terms of considering how alternative modes of transport should serve land development, to attain reduced emissions as well as less congestion. Perhaps the issue of congestion could be highlighted in the review of the options. The LTP and its SA would be best positioned to consider pressures on the network. 5. The table reports information on what has been happening in recent years rather than principles. The Council will consider the need to consult with the Agency for any future economic development likely to influence the use of the road network. 6. The Council to liaise with the Agency re: Air Quality Action Plans (AQAP). 7. The Council to liaise with the Agency once location of developments finalised to discuss impacts on SHN. 8. No action required. 9. The council recognises that options SD3 and EC11 have been found to be unsustainable, and will not be progressing these options.</p>
ISA005	Miss J Stephenson	Network Rail	No comment at this stage. Please keep informed.	Noted.
ISA006	Roy Gregory	Commercial Development Projects Ltd	<p>1. Options SD1 to SD3 - regeneration throughout the district is preferable to concentrating on specific areas. Employment development on greenfield land in the vicinity of motorway junctions will be needed to meet market demand. Developers will build outside the District if suitable sites are not allocated. 2. Options H1 to H21 - a higher level of house building should be encouraged. The concentration in the principle urban areas with restrictions on places like Ossett and Horbury is supported. Giving priority to the use of brownfield land before greenfield is supported but some development on greenfield land should be allowed. The brownfield target at 61% should be about the same. The minimum density should remain at 30 dwellings per hectare. The affordable housing maximum of 25% should be increased but 40% is on the high side. 3. Options EC1 to EC14 - more land should be allocated for employment use. Past take up rates are unreliable. Greenfield land in good locations must be considered. Employment sites have to be</p>	<p>1. The comment supports option SD3, considered unsustainable, and SD2, which does not follow the most recent planning guidance and whose sustainability is not certain in all cases. The LDF will allocate development sites in the District but it is committed to sustainable development. 2. The Council to register the support to the options taking into account the assessment of their sustainability. 3. As before. 4. No action required. 5. Option T3 is supported. Comments on parking standards noted, however, the preferred option is retain them (Option T4). They are required to meet national and regional planning objectives. 6. Comments noted. However, the preferred option is to retain the existing level of protection of the Green Belt in accordance with national planning guidance. 7. The Council recognises the potential public opposition to the designation of specific locations for waste management facilities. These issues will be covered in a future DPD on Waste. Comments noted on renewable energy policies. New policies are set out in the DC Preferred Options document.</p>

Comment Ref	Name	Organisation	Comment (Summarised by Wakefield MDC)	Council's Response
			<p>attractive to businesses, investors and the market or they will never be developed. Land in the vicinity of motorway junctions must be considered. Existing employment allocations should not be retained if housing or mixed use is more appropriate. 4. Options MU1 and MU2 - a policy encouraging mixed use development is supported. 5. Options T1 to T6 - developer contributions are supported. Maximum car parking standards are too stringent and complicated. They should be simplified. 6. Options GB1 to GB3 - the protection of the green belt is too rigid. PAS sites should be allocated for a specific purpose where possible. 7. Options DC1 to DC15 - waste management and treatment facilities should be encouraged but allocating specific locations will be difficult as no one will want a site identified next to them. A policy on renewable energy will be required but targets from on site renewable sources should not be included. Green Belt policies should be relaxed. Farm diversification should be supported. Tourism should be supported. 8. Options DC16 to DC29 – guidance on design is supported. Policies to protect and enhance Nature Areas, Woodland, Wildlife Corridors, Landscape Value Areas are not supported. Policies for lighting and air pollution are supported. Sustainable construction and energy conservation costs must not adversely affect economic growth and affordability.</p>	<p>However, targets for renewables on site are included in order to meet Regional Spatial Strategy requirements. Green Belt policies are needed to ensure protection of biodiversity land within greenbelts and to meet national planning policy. Policies encouraging farm diversification and tourism are included in the Core Strategy and DC Preferred Option Reports. 8. The Council has a duty to protect and enhance areas of natural environmental value. The Council to register support on option DC26. Comment on DC29 is also part of the detailed assessment of the option in Appendix G.</p>
ISA007	Mr J N Flint		<p>1. SD3: As this option isn't sustainable, I would like to see it deleted from the LDF. 2. EC8: This option needs to be amended to encourage development on brownfield sites and close to public transport networks. 3. DC7: A % should be set which is challenging but achievable. 4. DC20: The policy shall include a provision for expansion of existing, or erection of new Natural Areas. 5. DC25: requirement for native plants to be used in new developments, which are of greater benefit to wildlife. I would also like to see a requirement for developments to retain existing natural features where possible. 6. DC26: This option should</p>	<p>(1) p11. The 13 objectives reported are the ones proposed for the LDF. The Council has considered a new objective (LDF14 p34) on the protection and conservation of Wakefield's historic environment. (2) and (6) SA11 p29, indicator "Loss or damage" to be reworded as suggested. (3) p33 LDF obj.11 vs. SA obj. 1, 2 & 11: LDF objective 11 specifically refers to the protection and enhancement of biodiversity. The comment will be included in the compatibility assessment of LDF objective14. (4) p34. The Council to consider the rewording of LDF14 as suggested. (5) Comments noted. Indicators will be reviewed in the light of further sustainability appraisal work and be</p>

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			include a requirement for street lights not to be so tall, so that less light could be lost upwards causing glare in the night sky. 7. General: When new developments are proposed, developers should look into the feasibility of using solar powered street lights. Also, when existing street lights need replacement the Council should consider their use. 8. Overall: The methodology used appears sound, so long as the conclusions are acted on.	reviewed where significant effects are identified. (6) No specific options given in the Issues and Options Report to historic environment and therefore not included in the Initial Sustainability Appraisal. However, new indicator now included and historic environment covered in Core Strategy and DC Preferred Options Reports.
ISA008	Ian Sanderson	West Yorkshire Archaeology Service	1. LDF objectives omit reference to historic environment. 2. SA11 needs to include other protected sites/buildings and no reference to regionally important ones. 3. LDF objective 11 versus SA1, 2 and 11 should give consideration to land use allocation to avoid adverse impact on historic assets. 4. Support for additional objective LDF14. 5. Support for inclusion of new sub-objective to SA11, but should include regional examples from the West Yorkshire record. 6. No reference to historic environment in the options given on p.48.	(1) p11. The 13 objectives reported are the ones proposed for the LDF. The Council has considered a new objective (LDF14 p34) on the protection and conservation of Wakefield's historic environment. (2) and (6) SA11 p29, indicator "Loss or damage" to be reworded as suggested. (3) p33 LDF obj.11 vs. SA obj. 1, 2 & 11: LDF objective 11 specifically refers to the protection and enhancement of biodiversity. The comment will be included in the compatibility assessment of LDF objective14. (4) p34. The Council to consider the rewording of LDF14 as suggested. (5) Comments noted. Indicators will be reviewed in the light of further sustainability appraisal work and be reviewed where significant effects are identified. (6) No specific option given in the Issues and Options Report to historic environment and therefore not included in the Initial Sustainability Appraisal. However, new indicator now included and historic environment covered in Core Strategy and DC Preferred Options Reports.
ISA009	Ian Smith	English Heritage	Endorse this latest stage of SA. On the whole, agree with the report's conclusions.	Comments noted.
ISA010	Lucy Mitchell - Sustainable Development Manager	Yorkshire Forward	Yorkshire Forward supports the document. Revisions in Initial SA are welcomed. However, suggest that objective 10 would benefit from the inclusion of 'quality of life'. Also brownfield and density targets should take into account location and sustainability findings. Option EC10 should refer to a clear sequential test which includes accessibility, and proximity to other facilities and services.	(1) and (6) No actions required (2) The Council to include a description/definition of Quality of Life. (3), (4) and (5) These comments will be included in the Option Conclusions of Option H16, H18 and EC10 respectively.
ISA011	Bob Pipkin	Environment Services -	1. Options H13-H16, some brownfield sites have high bio-diversity value. Knowledge required of greenspace and	(1) The definition of brownfield land in PPG3 - Housing, Annex C excludes land which has significant biodiversity value. Each

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		Wakefield MDC	wildlife value required to make meaningful comparisons. 2. The Council will produce own standards for accessible natural greenspace.	site will be assessed individually under Sustainability Appraisal. (2) p25: The indicator for SA4 on Accessibility of Green Spaces will be amended and the WMDC internal indicator will be used instead when available.
ISA012	Matthew Naylor	Yorkshire Water	1. Support for policy to minimise pollution by cutting greenhouse gases and increase generation of energy from renewables. 2. Object to phrasing in Water Resources section. 3. Similar point made on p. 20. 4. Support for DC7. 5. Supports the use of sustainable urban drainage.	1., 4. and 5. No action required 2. and 3. Amend phrasing of the paragraphs indicated to include details about future investments.
ISA013	Mike Barningham	The Countryside Agency	1. Countryside Quality Counts could be used for baseline. 2. Landscape objectives missing from links to Regional SA. 3. Social Inclusion and Equity needs to be included in all sections. 4. Support for recommendation on page 32, especially for the rural population and settlements. 5. LDF14 needs to be widened to include landscape enhancement and protection. 6. Some concern with lack of issues relating to CO2, climate change, energy and resource efficiency.	1. Countryside Quality Counts information to be incorporated into the baseline. 2. The recommended Regional Sustainability Appraisal sub-objectives to be included in SA11. 3. The Council to consider the comment – and clarify how social inclusion and equity have been included and/or add considerations of such issues throughout. This may be through the inclusion of a new sub-objective to SA6. 4. No action needed 5. The Council to consider including “landscape” in Objective 14 (or add a new objective). 6. Climate change, CO2, energy and resource efficiency are implicit in the objectives and further explored in the Options.
ISA014	Felicite Dodd	English Nature	1. Amendments to environmental baseline required. 2. EN supports targets to increase the no. of residents living within the catchment area of accessible greenspace. 3. SD3 – EN agrees that this option is not sustainable and supports it. 4. H9 – EN does not support this option. 5. H10 – EN agrees is sustainable, however, brownfield land must still have ecological assessment. 6. H13 – EN agrees is sustainable and supports it. 7. EC8 - English Nature agrees that this option is not sustainable and supports it - the threat to greenfield sites and the effect on landscape is unacceptable. 8. EC11 - English Nature agrees that this option is unsustainable and supports it. 9. GB2 - English Nature agrees that this option is sustainable and supports it. 10. DC8 - English Nature supports this option. 11. DC20 - English Nature supports this option but would welcome the addition of opportunity to expand and create natural areas.	1. Amend baseline and references to SSSI as required. 2. to 4., 6. to 10., 13. to 20. No action required (3., 7. and 8. have been interpreted as EN's support for the assessment rather than for the options, which are unsustainable). 5. Insert comment in Option Conclusion of H10 (similar comment to ISA011 (1)). 11. and 12. Add comments in Option Conclusions of DC20 and DC21. 21. Add reference to heathland and grassland habitats in section 6.3

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			12. DC21 - English Nature welcomes this option but it will only be sustainable if appropriate funds and/or management are put in place to carry it out. 13. DC22 - English Nature agrees that this option is sustainable and supports it. 14. DC23 - English Nature agrees that this option is sustainable and supports it. 15. DC24 - English Nature agrees that this option is sustainable and supports it. 16. DC25 - English Nature agrees that this option is sustainable and supports it. 17. DC26 - English Nature agrees that this option is sustainable and supports it. 18. DC27 - English Nature agrees that this option is sustainable and supports it. 19. DC28 - English Nature agrees that this option is sustainable and supports it. 20. DC29 - English Nature agrees that this option is sustainable and supports it. 21. Section 6.3 should also refer to habitats such as heathland and grassland.	
ISA015	Karen Collett	Health and Safety Executive	LDF/Sustainability Appraisal needs to take into account guidance on Hazardous Substances.	PPS12 sets out the policies to be taken into account in the preparation of the LDFs, and replaces PPG12. Paragraph 6.22 of PPG12 is now Paragraph B17 in PPS12. Paragraph 6.23 has been slightly modified in PPS12, paragraph B18, to take into account that the policies should be included in the preparation and review of the local development documents, part of the LDFs. Policies on Hazardous Operations are included in the DC Preferred Options Report. The Council has up-to-date data on major hazardous pipelines. Consideration as to whether these should be shown on the Proposals Maps will be carried out in preparation of the Site Specific Policies and Proposals DPD.
ISA016	Michael Ray	Eco-Zero Pollute Tech Design	1. Base environmental standard should be zero-pollution. 2. Encourage sustainable construction methods, such as superinsulation and eco-friendly, top-up energy supply, natural cellulose newspaper insulation, large thermal mass, eco-friendly materials, zero waste management, zero pollution plant technology, PV high sensitivity solar and water heating panels.	1. Comment noted. 2. The Council to consider encouragement of sustainable construction practices
ISA017	Ian Thynne	Environment Agency	The Agency has concerns over the lack of options in chapter 10 relating to the environment. 1. Objectives SA11 and	1. The Council to consider the concerns of the Agency in terms of options relating to the environment, as exemplified in

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			<p>SA14 from chapter 7 address the concerns of the Agency from a broad perspective and the Agency fully supports these as objectives. However further options should be drawn up to mirror these in chapter 10. 2. The Agency specifically expects further clarity around development and flood risk and pollution prevention of the water environment. Further options need to be considered to address the following: a) Flood Risk: From a strategic spatial planning perspective b) From a development control aspect, the Agency requires that there will be no inappropriate development in the floodplain. c) Pollution Prevention: Chapter 10 fails to address this growing concern of the Agency. d) Contaminated land also needs to be considered and the LDF should consider addressing this issue in Chapter 10. The Agency has the following comments to make on existing options: 3. Option DC7: This option allows for a significant step forward in providing more energy efficient development but should also consider water resources and water efficiency. 4. Option DC22: The Agency supports the Council's commitment to achieving the requirements of the Local Biodiversity Action Plan, however this option should also include policies to enhance habitats and not just protect. 5. Option DC23: Again, policies relating to this option should include an emphasis on enhancement as well.</p>	<p>comments from EA. 2. The LDF to consider the inclusions of policies on development and flood risk (see the Agency's comments (a) and (b)), pollution prevention on the whole of the water environment (c) and contaminated land (d). 3. The Council to consider setting a target for option DC7 and include water efficiency. 4. and 5 Wording to be amended in Options DC22 and DC23 to include enhancement.</p>
ISA018	Tim Kohler (Chair Person)	Wakefield District Biodiversity Group	<p>1. Under 3.2 we welcome and support the specific commitment to protecting and enhancing biodiversity; 2. In Table 1 (page 12) the target to create 150,000 new jobs in the region is quoted. We would note that while accepting that job creation is necessary to maintain the economic health of the district, this should be proportionate to the requirements of the district. 3. Again in Table 1, page 14 we welcome and support the commitment to the Natural Environment. 4. Under Natural Resources and Waste, we feel this section could be strengthened by the addition of commitments to energy efficiency and water recycling; 5. In</p>	<p>1. No actions required 2. The target mentioned refers to the whole Yorkshire and Humberside Region. Environmental considerations on job creation have been considered in the assessment of the options through the SA Framework. 3. No action required. 4. The Council to consider the addition of objectives on energy efficiency and water recycling 5. Add reference to Wakefield Nature Areas in the baseline. 6. Add reference to grassland and heathland, and energy efficiency. 7. No actions required 8., 9., 10., 11. Add to SA7, SA8, SA9 and SA12 as required. 12. to 15. No actions required. 16. Consider comment on brownfield sites to be added to H15 and H16 17.</p>

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			<p>table 2, summary of base line information, reference could be made in the section on biodiversity (page 17) to Wakefield Nature Areas; 6. In section 6.3 (page 20) we welcome and support the stress given to maintaining and enhancing a bio-diverse and attractive natural environment in the district. 7. In table 3, under SA4 (page 25) we welcome and support the recognition that access to and provision of local greenspace has a contribution to make to health; 8. Under SA7 (page 26) the indicators could include the number of accessible natural greenspace sites; 9. Under SA8 (page 26) accessible natural greenspace could be included as one of the key local services (second bullet point); 10. Under SA9 (page 27) we welcome and support the objective of improving energy efficiency of housing. This could be reflected in the indicators by encouraging the improvement of current housing standards; 11. We welcome and support the environmental objectives set out on pages 28-32. Under SA12 additional indicators could be – The number of SSI in appropriate management, - the completion and implementation of the Biodiversity Action Plans; 12. Under section 8 we would note and support the comment under LDF objective 5 vs. SA objective 12. 13. Under section 9.2 we would support the changes proposed to objective 10, and we would support the inclusion of the new objective 14; 14. In section 10.2.1, we would support the conclusions under SD3; 15. Under section 10.2.2, options H6 and H13, we would support these conclusions; 16. For options H15 and H16 we would note that brownfield sites can make very significant contributions to local biodiversity. 17. Under section 10.2.3, option EC10, we feel that the stress on regeneration is not sustainable, as it implies that this over-rides other issues. Greenbelt land should be released for development only in exceptional circumstances – full stop; 18. We support the conclusion under option EC11; 19. Under section 10.2.6, option GB1, we would repeat the comment made above at our point 17; 20. Under</p>	<p>The concern over the focus on regeneration has been included in the Option Conclusions of Option EC10. 18., 20. and 21. No action needed 19. Option GB1 is a “do nothing” scenario – comment to be included should the option be taken forward.</p>

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			section 10.2.8 we would support the conclusions under options DC6 and DC8; 21. We welcome and support the conclusions under section 10.2.9.	
ISA019	Malcolm Ball		Concerns relating to focus of investment on other parts of the Wakefield district to the detriment to Ossett and Horbury. Recent closures of employers within this area and likely to more in future. This area will struggle to attract support and investment from new employers without assistance. The consequences of an uneven strategy have to be examined. Lack of adequate local training and educational venue in Ossett and Horbury area and lack of investment in them.	The Council to consider the issues facing Ossett and Horbury.