

Site Specific Proposals Document Representations – Draft Methodology Paper March 2009

REPRESENTATIONS RECEIVED

ID NUMBER & NAME	Paragraph/ Page No	ORGANISATION	COUNCILS RESPONSE	COMMENTS
39879 Matthew Naylor	Technical Consultations, page 25	Yorkshire Water	Yorkshire Water will be re-consulted on sites within the ongoing process of preparing the sites document for submission.	We have been consulted on your Issues and Options and Preferred Options Site Specific proposals and provided comments on the water supply network, sewerage infrastructure and waste water treatment capacity. I note that on page 25 of the Technical Consultation paragraph you acknowledge this, however it also states that sites have been excluded if there is an over-riding constraint. Yorkshire Water's comments were made three years ago and may be slightly different now, were any sites excluded due to our comments?
39879 Matthew Naylor	Flood Risk, page 26	Yorkshire Water	Flooding from sewerage systems was recognised but not investigated in any depth in the SFRA, this being a level 1 SFRA. Yorkshire Water will be consulted on individual development proposals, the combined impact of sites and about any infrastructure problems by settlement as part of the site assessment process.	The flood risk section on page 26 states that SFRA has been used to assess the flood risk at each housing site, however Yorkshire Water were not consulted on the SFRA so were all sources of flooding assessed using the SFRA? It would be very worthwhile for us to meet and examine the allocations DPD and ensure infrastructure provision is co-ordinated with new development.
112117 David Boulton	Section 4.3 page 18 - 19	Carter Jonas for Nostell Estate	The distribution of development is in accordance with the CS and has been determined by Public	Accepting the over-arching approach deemed sound in the Core Strategy, there is a clear recognition that development associated with Local Service Centres will be of a reasonable magnitude (up to 10% of the District's housing requirement). How this is aggregated to individual settlements is a function of housing need, the relative sustainability of the respective settlement,

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			Examination. The number of dwellings in Local Service Centres is a maximum figure which meets local needs plus an additional 10% for flexibility. No change.	<p>deliverability and availability of specific sites.</p> <p>The estimates of housing need (section 4.3) contained in the Housing Technical Paper are primarily based upon that generated by each individual settlement. However, Local service Centres have a broader role to play given their recognised influence across rural hinterlands. So, any estimated local need will be more than just that derived from within the existing settlement itself – beyond the method stated at page 18/19 – but should encompass that from outlying (less sustainable) areas too as focussing such new development in the most sustainable location, yet still retaining a local focus, will add to this settlement based estimate of housing need.</p> <p>This is reinforced by the spatial development strategy aims to create sustainable communities by concentrating new development in Urban Areas and Local Service Centres.</p>
112117 David Boulton	Section 4.5	Carter Jonas for Nostell Estate	Supporting comment	Beyond the contextual issue, the considerations in section 4.5 establish a reasonable approach.
112117 David Boulton	Section 4.6	Carter Jonas for Nostell Estate	Supporting comment	The site assessment process (section 4.6) provides a suitable sieving mechanism to distinguish between various sites.
112117 David Boulton	Green Belt Methodology page 31	Carter Jonas for Nostell Estate	Not all the PAS sites may be as sustainable as some Green Belt sites. It would therefore be wrong to give PAS land priority. The GB review will set permanent GB boundaries to 2026 in accordance with the CS to provide flexibility in the	<p>The allocation of existing PAS land residential development needs to be given clear priority above the relaxation of Green Belt boundaries to accommodate new development sites. The stated three elements of the sequential approach (page 31) are required changes to the Core Strategy and are accepted.</p> <p>The need to ensure the longevity and permanence of Green Belt boundaries is a given and, in the case of Wakefield, this needs to be extended to (at least) 2026 and preferably beyond that period. While changing figures dilute such certainty is sensible to ensure that boundaries are not so tight as to require periodic or ad hoc review. Even the stated need for potential review post 2021, when this DPD expires, is considered rather short term. This longevity can be assured by pursuing a suitably flexible approach, factoring in a degree of 'room for manoeuvre' (ie identifying PAS land for instance). This is accepted, to some extent, in the text but excludes the consideration of Local service Centres in</p>

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			<p>context of the Site Specific Proposals document which will allocate land to meet development requirements up to 2021. Local Service Centres should only be developed to meet local need in accordance with the CS Spatial Strategy, and the GB around them does not need to be reviewed at this stage.</p>	<p>terms of any relaxation of Green Belt boundaries without any reasoned argument for such exclusion. It is considered that to discount the need for such a possibility now is premature as development to meet housing (and employment needs etc) for some Local Service Centres may necessitate intrusion beyond present Green Belt boundaries post 2021. The option not to identify PAS land and rely on identification of special circumstances (PPG2) to meet local needs in such sustainable settlements runs contrary to the desire to effectively plan for future growth. While a focus on the Housing Growth Point is accepted, this should run hand in hand with Local service Centres where Green Belt Boundaries are unduly restrictive at present given potential future needs and the desire to retain the permanence of the Green Belt over a reasonable time frame.</p>
40293 Robert Masheder	Page 12, Box 2 (nature conservation sites)	West Yorkshire Ecology	<p>As part of the site assessment all these ecological sites are covered in the sustainability appraisal. The Settlement Technical Paper was considered as evidence supporting the Core Strategy in 2008 and has been confirmed through public examination. No change.</p>	<p>This expression needs expanding to: "Nature conservation site, biodiversity habitats and species of principal importance and wildlife corridors" The expression nature conservation sites is likely to have limited interpretation to mean Special Areas of Conservation, Sites of Special Scientific Interest, Sites of Scientific Interest and potentially Wakefield Nature Areas. PPS9 states in paragraph 4, "<i>They (local authorities) should ensure that policies in LDF documents reflect, and are consistent with, national, regional and local biodiversity priorities and objectives (including those agreed with local biodiversity partnerships)</i>". This indicates that both losses and the opportunities afforded by development for maintenance and enhancement of all habitats and species of principal importance covered under the Natural Environment and Rural Communities Act 2006 (S41), should be regarded as important in determining the sustainability of any selected sites.</p>

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				It is also worth noting that the number of Local Sites (Sites of Scientific Interest) designated within Wakefield is considerably lower than other Districts within the Yorkshire and the Humber Region. It is not clear from the expression “nature conservation sites” whether this also includes the Wakefield Nature Areas.
40293 Robert Masheder	Stage 1 page 26	West Yorkshire Ecology	Amend to clarify that development sites which may damage the SAC and SSSI’s will be rejected at this stage.	<p>This section which eliminates sites which should not be developed should be used to cut out any Special Areas of Conservation or Sites of Special Scientific Interest <u>and</u> any sites which might result in the degradation or isolation of the afore-mentioned sites.</p> <p>These are the highest value biodiversity sites in the area and it is essential that sites which may directly or indirectly impact on this interest are screened out at the earliest opportunity.</p>
40293 Robert Masheder	Stage 2 page 27 - 28	West Yorkshire Ecology	Amend to clarify that ecology will be considered and development sites which may damage sites such as AW and SSI’s will be rejected.	<p>This section needs to screen out ancient woodlands, Sites of Scientific Interest and Wakefield Nature Areas and any sites which are likely to lead to the degradation or isolation of the afore-mentioned sites.</p> <p>Ancient woodland sites are recognised within PPS9 as being irreplaceable and are therefore of particularly high nature conservation value. The Sustainability Appraisal Report recognises that Wakefield District has only a very limited area of land which is designated for its nature conservation value (2%). In order to “maintain, and enhance, restore or add to biodiversity” as required by Key Principle 1 (ii) of PPS9 it is essential that these sites are protected and do not become isolated from the wider countryside.</p>
40293 Robert Masheder	Stage 3 page 28	West Yorkshire Ecology	BAP species etc will be considered as part of site assessment and sustainability appraisal. All national guidance is taken into account.	<p>This section needs to rank sites by the positive contribution which they are able to make to habitat creation and the network of wildlife corridors. At the same time it should rank lower, sites where development will adversely impact on known UK or Local Biodiversity Action Plan priority habitats and species. In these circumstances consideration should be given to the requirement to provide mitigating habitat and where this might be located, as required by PPS9 Key Principle 1(vi).</p> <p>The Council has a duty to have regard for the conservation of biodiversity under the Natural Environment and Rural Communities Act 2006 S40. Both UK and Local Biodiversity Action Plan habitats and species are referred to in S41. This point is reflected in Objective SA12 in the Sustainability Appraisal Report.</p>

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40293 Robert Masheder	Section 7.2, Environmental Issues page 42	West Yorkshire Ecology	Comments noted. Restoration and redevelopment of brownfield land and impact on ecology are considered through site assessment, by sustainability appraisal and technical consultations (where the Ecology Service has the opportunity to identify sites of ecological value).	The sentence “ <i>Future development should increasingly be on previously developed land, and, where possible, enable the clean-up of contaminated land</i> ” does not sit well in the paragraph concerning nature conservation. The expression “previously developed” and “brown field” need to be used with care and caveats. An estimated half of the Site of Scientific Interest and a number of the Sites of Special Scientific Interest could be described using these terms. Mineral sites in particular should be given closer scrutiny as they often offer some of the best opportunities for biodiversity enhancement. The use of “urban brown field”, used at the start of the document, was better although some quarry sites in urban areas are important for their wildlife value. The Sustainability Appraisal Report makes reference to the targets within the Local Biodiversity Action Plan. If these targets are to be met significant areas of minerals sites will need to be set aside for biodiversity. This is particularly relevant to Magnesian Limestone quarries which often provide a refuge for specialised flora and fauna which has become increasingly scarce in the agricultural environment. Such quarries have been subject to extensive re-development for housing, waste and employment uses in the sub-region. This represents an opportunity lost for biodiversity. Open Mosaic Habitats on Previously Developed Land is a new priority habitat which has recently been added to the UK BAP. These sites can be particularly rich in flora and fauna, particularly invertebrates.
40293 Robert Masheder	Section 7.4 Appropriate Assessment page 45	West Yorkshire Ecology	The Appropriate Assessment examines the combined impact of policies and site allocations on the SAC. Amend text to clarify.	This section needs to use the phrase from the Habitats Regulations, “ <i>..alone or in combination</i> ”. It is important for strategic planning documents to recognise the cumulative impact of plans or projects on the system of European Natura 2000 sites (SACs/SPAs) and the full protection offered within the law.
40293 Robert Masheder	Section 8 stages 1 to 3 page 47 and	West Yorkshire Ecology	The Appropriate Assessment examines the	Points 2, 3 and 4 above are equally appropriate in these sections of the document. It is important for strategic planning documents to recognise the cumulative

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	48		combined impact of policies and site allocations on the SAC. Amend text to clarify.	impact of plans or projects on the system of European Natura 2000 sites (SACs/SPAs) and the full protection offered within the law.
39841 Victoria Molton	Housing Allocations page 21	Walker Morris	This issue was dealt with in the Core Strategy Examination. Policy CS3 and supporting justification confirms that land should be allocated to 2021. No change.	The time period for allocating land is set to be from 2004 – 2021. This would give an 11 year supply of housing land if the DPD is to be adopted in 2010. For the period from 2021 to 2026 it is suggested that broad areas of search will be identified that will be the location of future housing development. PPS3 states that 'Where it is not possible to identify specific sites for years 11 to 15, broad locations for future growth should be indicated'. From assessing the information contained in the SHLAA (2008) it appears that there is plenty of provision to allocate land to 2026 by the way sites have been categorised in the phasing column ie 0-5 years, 6-10 years, 11-15 years and 16+ years. It is therefore possible to allocate land to 2026 and the LPA should do so. By doing this will add more certainty to the DPD and the amount of land that can be supplied. It may be appropriate to phase sites in the same way as has been done in the SHLAA.
39841 Victoria Molton	Housing requirement page 22	Walker Morris	Phasing of sites will reflect evidence from the SHLAA and the Housing Growth Point programme of development. The Growth point is not a requirement like the RSS figure, but is an aspiration.	The way in which the housing figures have been calculated with regards to the New Growth Point Status achieved by the Council do not comply with the correct time scales given to the development of housing in the NGP areas. The document titled 'New Growth Points: The Programme of Development for the Leeds City region 2008 – 2016/17' states at paragraph 1.5 that 'three local authorities [Barnsley, Calderdale and Wakefield] have been identified as being able to commit to the potential to deliver early, additional growth above RSS targets in the period to 2016/17 through award of Growth point Status'. However, the table following page 22 in the draft methodology shows that the extra allocation of housing development apportioned to Wakefield, being 20%, has been averaged out over the period 2008 to 2021. It would be appropriate if the figures peaked in 2008 to 2016/17 and then returned to the RSS figure of 1600 dwellings per annum. The annual figures would therefore be as follows: 2004 – 2008 1170; 2008 - 2011 1920; 2017 – 2026 1600: Total 36, 360 (net).

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				The majority of the delivery would therefore be concentrated in the period 2008 – 20017 and sites should be phased to reflect this.
39841 Victoria Molton	Housing requirement, page 22	Walker Morris	The table is indicative to get the right distribution of housing among settlements and the council will consider allocation of sites in accordance with the Core Strategy.	The specific need identified in Horbury is for 22 dwellings per annum which would total 396 dwellings to 2026. However, it is suggested in the draft methodology that Horbury is a settlement that is to have restricted development. Furthermore, in light of the LPA's decision to add a further 10% to the RSS figure to allow flexibility, the figure required to meet the need of Horbury would now be 436. The completions and commitments total is 381, therefore there is a need to provide around 55 dwellings. As this figure can not be reliant on windfall sites, a housing allocation is required in Horbury.
39841 Victoria Molton	Housing Requirement Table	Walker Morris	Agree to number columns for clarification. Do not consider necessary to add another column.	There are a few improvements which could be made to the housing requirements table. It would be helpful if the columns are numbered so that they can be referenced easily. A fourth column outlining the net allocations required plus the 10% uplift would give a total number of allocation required, ie 17, 486. Currently, only the gross number is shown.
39841 Victoria Molton	Technical Consultations page 25	Walker Morris	A site assessment document will be produced setting out the reasons for allocating and rejecting site proposals.	It is stated that in the Technical Consultations section of chapter 4 of the draft methodology that 'where an over-riding physical constraint has been identified the site has been excluded from further consideration'. It is assumed that the over-riding constraint will be decided by the LPA. It may be the case that the land owner could overcome the constraint and should therefore be given the chance to rectify the situation. It would be useful if the sites that are likely to be rejected could be allocated in a separate document along with the reasons for discarding them. This will then give the land owner the opportunity to comment and provide further information. This will mean that the sites selected will be 'justified: founded on a robust and credible evidence base'.
39841 Victoria Molton	5.0 Green Belt	Walker Morris	Comments noted.	The need for a Green Belt review is welcomed. As Wakefield is now a New Growth Point it is essential that the most sustainable locations are selected to accommodate the extra housing sites required and this is likely to mean de-allocation land from the Green Belt.
39841 Victoria	5.0 Green Belt	Walker Morris	Amend text to clarify this will be part of the	In the stakeholder event meeting, it was explained that the Green Belt will use, as a starting point, the UDP Green Belt. Where sites are assessed in the Green

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Molton			Green Belt assessment.	Belt to be suitable for housing development, the Green Belt will be amended to fit around the Sites DPD. It should be borne in mind that where land is taken out of the Green Belt, the adjacent land still in the Green Belt should be assessed to ascertain whether it still forms one of the functions of being included in the Green Belt. This should be an extra stage added to the assessment of taking land out of the Green Belt.
39841 Victoria Molton	4.6 Site Assessment	Walker Morris	Comments noted. Accession is part of the site assessment process alongside sustainability appraisal. Mitigation will be considered within the site assessment process.	<p>The factors used in assessing a site for housing development are currently all given the same weighting and a score of either:</p> <ul style="list-style-type: none"> √√ double positive √ positive - neutral X negative XX double negative <p>Sites are also given an accessibility score of 1 (low level of accessibility) to 6 (high level of accessibility). These scores are based on the LPA's use of accession software. In the stakeholder event, the LPA stated that many of the sites achieved a high score (5 or 6) and that this caused a problem in ranking the sites. However, this would appear to be a positive feature of the sites submitted and should in effect give the LPA a good choice of sustainable sites. I therefore suggest that the accession modelling results are prioritised and that sites scoring a 5 or 6 are then put forward to the main site selection process. However, where land owners are informed that their sites have scored less than 5, they should be given the opportunity to rectify the situation. The next stage is to look at the other issues listed such as economic sustainability, social sustainability, environmental sustainability, transport and environment, where the site is located in location to the urban area, the position of the site in the settlement hierarchy and the greenfield/ brownfield status of the site.</p>
39841 Victoria Molton	4.6 Site Assessment	Walker Morris	The scoring system has been used in the previous stages of the sustainability appraisal and it would	It would be helpful for numeric scores to be given to the sites ranking. The way in which the sites are then ranked can be seen far easier and it will be easier to compare sites against one another. This can be done by settlement so it is easy to see where a particular site ranks within each settlement. Therefore the factors that are to be used to assess each site are all included in the draft

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			not be appropriate to change them at this stage.	<p>methodology and the 'Options assessment Technical Paper' but it would make them easier to understand if they were used as follows:</p> <p>Stage 1: Establish which settlement each site is located in and put it in order of the settlement hierarchy as outlined in the Core Strategy.</p> <p>Stage 2: Rank each site in each settlement using the accession modelling results and only take forward sites scoring 5 or 6. At this point, land owners should be informed that their site does not score highly enough in accessibility terms and should be given the opportunity to rectify the situation.</p> <p>Stage 3: Sites are scored numerically against the criteria in the sustainability appraisal.</p> <p>√√ double positive = 10 √ positive = 5 - neutral = 0 X negative = -5 XX double negative = -10</p> <p>Stage 4: Scores for each site are then calculated and a list of sites is produced from which the highest scoring will be allocated in the DPD to meet the housing requirement figure. In addition a report should be prepared showing the sites that have been rejected and the reason why, for example in some cases there may not be a major constraint, the site may just not be as highly scoring as another. However where there is a major constraint, this should be highlighted and the land owner should be informed as it may be able to be rectified.</p> <p>This method is far more transparent and easy to understand than the one currently suggested. It also gives landowners the chance to see where in the 'housing pipeline' their site is located.</p>
121451 Andrew Rose	4.0 Housing Methodology	Spawforths	Supporting comment.	We broadly endorse the methodology, in particular the 10 percent flexibility allowance.
121451 Andrew Rose	4.4 Housing requirement page 20	Spawforths	Amend to remove windfall from text.	Section 4.4 Meeting the Housing Requirement incorporates a provision for windfall housing. The windfall housing element has been removed by the Inspector from the Core Strategy and therefore specific provision should not be included in the Site Specific Proposals DPD.

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121451 Andrew Rose	4.4 Housing requirement page 22	Spawforths	Amend text for clarification.	<p>The RSS approach to delivering housing change is summarised in the paragraph at the top of the page. The section should accord with the RSS and should refer to the position that the delivery of “Later Years” scenarios, including urban extensions, may need to come forward sooner. Furthermore, Table 2.2 of the RSS is not a policy statement. Therefore, there is a flexible approach to the scenarios. This should be reflected in the Methodology and a prescriptive sequential approach should not be applied.</p> <p>Furthermore, the approach to 2026 is unclear in this section, the penultimate paragraph on page 21 sets out that for the remaining period up to 2026 Broad Locations are shown in the Core Strategy, whilst the second paragraph on page 22 explains that a future review will identify sites. This should be clarified in relation to the situation endorsed by the Inspector where Green Belt change is needed in the short term.</p> <p>In addition, on page 22 the element of windfall housing is cited in relation to the delivery of sites in Horbury. The Council should be allocating the future provision of settlements. This should be removed in accordance with the Inspector’s Report.</p>
121451 Andrew Rose	Housing Requirement Table page 22	Spawforths	Incorrect. The assumptions in the table result in higher allocations of housing in larger settlements. No change.	<p>The table after page 22 includes an element for villages and applies the 10 percent flexibility to this element. The table shows that there are significant commitments in villages, which does not accord with the Spatial Development Strategy. This overprovision is subtracted from the overall requirement for villages producing a negative total to which an additional 10 percent flexibility is applied. This is then subtracted from the overall Gross Allocation decreasing the level of new housing in the District. This is inappropriate and must not affect the future housing provision for the District, in particular applying flexibility for villages which should not be accommodating housing due to historic over commitments is unsound.</p>
121451 Andrew Rose	Accessibility Table page 25 -26	Spawforths	Amend for clarification. Methodology modified to reflect local circumstances	<p>The accessibility table on page 25 and 26 does not include an element for Urban Areas.</p>

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			in the context of RSS.	
121451 Andrew Rose	4.6 Stage 2 page 28	Spawforths	Amended for clarification. The sequential approach criteria are the same as for other sites as set out in the CS.	On page 28 in the final paragraph of Stage 2. The second sentence refers to Green Belt and that they will generally fall in the lower priority categories. This does not reflect the Inspector's Report which has removed the sequential approach to site selection. Furthermore, this is not in accordance with PPG2 in relation to Green Belt release or that some Green Belt sites are more sustainable and would assist with regeneration initiatives. Therefore, at the end of this sentence additional wording needs to be added stating "... categories, except strategic housing sites that would deliver major regeneration benefits or are needed for the housing growth of the District".
121451 Andrew Rose	5.3 PAS page 31	Spawforths	Amended for clarification.	The approach to Green Belt needs to be consistent throughout the document. This should be checked carefully. Page 31 refers to PAS sites and the approach to PAS. Perhaps this would be clearer in sub-section of its own and a criteria approach to the review and inclusion of existing PAS sites and the addition of further PAS sites in order to secure the permanence of the Green Belt boundary. The fact that any review of the Green Belt needs to maintain the new boundary in perpetuity should be emphasised.
121451 Andrew Rose	5.3 Settlements page 32	Spawforths	Amended for clarification. Green Belt review is of Growth Point and SE Regeneration area, not all the Urban Areas such as Horbury, Ossett and Stanley/ Outwood.	Page 32 in the list of settlements where a review of the Green Belt is to be undertaken does not include all the Urban Areas, or elude to that other Urban Area settlement boundaries may need to be reviewed, which when assessing the SHLAA and the level of commitments for some Urban Area settlements may need to occur. Therefore, all Urban Area settlements should be listed. Or with PAS sites being reviewed, then the Green Belt boundary is being reviewed in all those settlements with PAS sites, therefore it would be more appropriate to refer to a Green Belt boundary is to be undertaken in accordance with the Spatial Development Strategy. In the first bullet point following the list of settlements on page 32, there is reference to Green Belt land only being considered for allocation when all suitable sites within the urban areas have been allocated. The terminology "when all suitable sites" is particularly unclear and needs clarifying.
111858	4.5 Identifying	Pontefract Civic	Comments noted.	The most important section of this Consultation document is 4.5 "Identifying

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Adrian Pope	Land for Housing Allocations	Society		Land for Housing Allocations” because of the scale of Housing land required and because this has justified a localised review of the Green Belt. The land identification process is in 2 parts: Process A identifies potential housing sites and assesses their characteristics (p23 to top of p27) and then Process B contains the 3 stages of site assessment (p27 to p29). This assessment process is essentially piecemeal, where each site is considered in isolation. The Civic Society accepts that this is appropriate for all the rural areas and smaller settlements within WMDC, subject to the 2 concerns set out below.
111858 Adrian Pope	4.5 Identifying Land for Housing Allocations	Pontefract Civic Society	Amend text to clarify that cumulative impact will be considered through sustainability appraisal and technical consultations.	On the other hand, the Society has some serious concerns about whether the methodology is adequate for dealing with the very extensive new housing requirements in Pontefract (and probably in the other larger settlements). In these towns the cumulative effect of sites will be very different from the sites individually and may require phased investment in infrastructure which could then transform the assessment of the sites and also change priorities. However the Society is only suggesting an extension to the proposed methodology, rather than its replacement. This will lead to broad strategic decisions on the sites to be allocated linked to phased programmes of infrastructure investment. It will enable the Council to become much more proactive in these larger settlements when applying the delivery strategy which is supported by the Ldf Inspector in paragraphs 32.37/38. Hopefully it would also enable the quality of design and facilities to be much higher.
111858 Adrian Pope	4.6 Site Assessment Process	Pontefract Civic Society	Broad locations are set out in the Core Strategy and sites in those locations will not be considered in the Site Specific Proposals document which covers the period up to 2021. The sustainability	The Society’s particular concerns on Process A when it is applied to the larger settlements are as set out below: We expect the housing sites to be assessed will include all those included in the recent SHLAA report but, as indicated in our correspondence with Richard Hollinson dated 06-11-08, we believe there are additional “broad locations for future growth which need to be examined in the larger settlements” in line with government advice in “Strategic Housing Land Availability Assessments – practice guidance”. Such sites may have been overlooked to date as currently developers may not have indicated interest in them. This assessment of ‘broad locations’ could become more critical for WMDC if the RSS Housing targets are

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			appraisal assesses the impacts of each site on its surrounding area.	revised upwards as is suggested in the recent consultation on the Regional Assembly's 'The Housing Challenge : Spatial Options Consultation'. The forthcoming Green Belt Review needs to look beyond immediate needs even if the additional 'reserve' sites are identified only as PAS in the Ldf. Our reading of the background documents suggests that the work leading up to Table 18 of the Housing Technical Paper does not include a specific assessment of the <u>impacts</u> of each site upon its surrounding area. e.g. traffic consequences, visual effect especially adjacent to green belt, demand for school places, etc. (We note that Site Assessment Process Stage 1 (p27) does say "the impact on local highway network is used at that stage" but it is not clear how this will be done.) Some of these impacts may be capable of alleviation by investment so such problems of impact may not rule out a site especially at this Stage 1 and especially in the larger settlements.
111858 Adrian Pope	4.6 Site Assessment Process page 27 - 28	Pontefract Civic Society	Cumulative effect and infrastructure investment will be taken into account. Amend section to clarify.	The Civic Society has the following concerns about features of the 3 Stages of Process B (p27 – p28) with regard to the larger settlements. <u>Stage 1</u> Sites with serious problems should not be ruled out at this stage if there is any possibility that investment as part of a settlement strategy may overcome the difficulty. The process should recognise the cumulative effect of many new sites in the same sector of a town. (E.g. cumulative traffic, school demand, sewers, etc.) and the opportunity this may provide e.g. a new road or school. If sites depend on such investment, clearly this introduces the concept of phased development. The process should recognise that, with such large-scale developments, land for other uses may be required (e.g. schools or small-scale retail or businesses) and allowance should be made for this. In some parts of older towns, especially near Conservation areas, there may be a series of brownfield sites which really require an Area Action Plan to co-ordinate investment and design (see Civic Society evidence in Ldf CSSD 71 p5/6)
111858 Adrian Pope	4.6 Site Assessment Process page	Pontefract Civic Society	Policy for density and previously developed land is set out in the	<u>Stage 2</u> The Civic Society has no serious concerns on Stage2 except on housing mix and open space. The proposed density of 50 dw/ha in Pontefract town centre and similar locations has relied in recent years on a high proportion

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	27 - 28		Core Strategy. Dwellings for older people are not ruled out and density needs to be balanced against housing mix. Amend to remove statement about housing windfall.	of apartments for which demand has now fallen. The density of 40 dw/ha for the rest of Pontefract effectively rules out the use of bungalows which are often the dwelling of choice for older persons. The local authority should specifically encourage bungalows and especially sheltered/wardened sites which are near to facilities and public transport even if a lower density has to be accepted. Our concern about open space is that the emphasis on PDL may risk too much open space (including school playing fields) being redeveloped. Whilst commenting on PDL/ brownfield land we would query whether the second paragraph under 4.4 (p20) is now acceptable to central government when it suggests that the Ldf will contain “an agreed allowance for future brownfield windfall housing on unallocated sites.”
111858 Adrian Pope	4.6 Site Assessment Process page 27 - 28	Pontefract Civic Society	Cumulative impact will be taken into consideration as part of the site selection process and sustainability appraisal.	<u>After Stage 2</u> The Society suggests that between Stages 2 and 3, a more strategic assessment should be carried out of groups of sites especially those which share common problems/benefits and especially those which could create investment opportunities (e.g. green transport initiatives, road building, school facilities, etc) This assessment could well modify the provisional priorities reached in Stage 2 and could lead towards a preferred phasing of sites/groups of sites. The Society does not have the full picture of problems regarding schools, drainage, bus routes, etc in Pontefract so it is unable to suggest what conclusions may emerge from a full strategic study of Pontefract. However we are familiar with the road traffic situation – which is serious and, in our evidence to the Ldf Examination, we have put forward a variety of possible improvements. Many of these highway schemes are critical to the acceptability of additional housing sites and most could be implemented with finance from S106 agreements on planning permissions for new housing. We note that, at the reconvened Ldf Examination, Mr. Gough asked for a “planning framework for growth” and Spawforth’s representative sought a “Direction of Growth for key settlements.” We believe both are asking for a proactive approach to this major housing expansion similar to the one we propose and in place of the piecemeal approach.
111858 Adrian	4.6 Site Assessment	Pontefract Civic Society	Impact will be taken into consideration as	<u>Stage 3</u> The Society’s only comments on the final stage of the process are to ask for an extra bullet point (e) concerning any negative impacts of the site

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Pope	Process page 27 - 28		part of the site selection process and sustainability appraisal. Amend accessibility section to reflect revisions to the Accessibility Model.	upon its surrounding area and to underline our concern about the accessibility model.
111858 Adrian Pope		Pontefract Civic Society	Site Proposals will be considered in the Site Specific proposals DPD, not the Methodology Paper.	The three attached plans illustrate the approach by showing in turn: Appendix A: Possible Housing sites in Pontefract Appendix B: Suggested new roads and road improvements (subdivided by likely source of funding). Note in particular the Northern Link Road which is a necessary part of the Prince of Wales development, the Western Boulevard (which originated in the Renaissance study and forms part of the South East Link Road), the Civic Society's Town Centre Northern relief road and Eastern Spine route. Appendix C: Possible Housing Strategy in Phases 1 – 6, based closely on necessary highway improvements.
111858 Adrian Pope	Accessibility page 25	Pontefract Civic Society	Accessibility Model has been amended in consultation with METRO. METRO's comments on sites take the Accessibility Model into account. Mitigation measures will be considered on an individual site basis.	The Society has two main concerns on the Stage 1 methodology as it affects <u>all parts</u> of the District in both Process A and Process B Stage 3 Waterman's Public Transport Accessibility model (p25) uses notional speeds which ignore recognised congestion locations and therefore leads to some spurious results. Some parts of Pontefract are affected by this problem. We therefore suggest that based on Bus Operator experience, some manual adjustments are made to the scores awarded to some potential housing sites to reflect reality. In Stage 3 it may be necessary to revisit these journey times as a result of the extra traffic generated by sites being allocated for housing. Waterman's table on p25/6 contains some puzzling arbitrary time-categories. For example, in the column "Primary Health/Primary Education" journey times used vary between 20, 30 and 40 minutes and acceptable walk times vary between 5min to bus-stop, to 10 or 20 min for no apparent reason. This should be checked.

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111858 Adrian Pope	5.1 Policy background page 30	Pontefract Civic Society	Reflects policy context in Core Strategy. No change.	In the middle of p 30 there are 4 bullet points. The Society suggests that the fourth one should be worded more precisely. We suggest “extra sites which may be required before 2026 to meet any additional housing requirements arising from the review of RSS. These sites will be protected as PAS.”
111858 Adrian Pope	5.2 Green Belt Review page 31	Pontefract Civic Society	Comment noted. The SHLAA will be reviewed annually.	In Para 2 of p 31 reference is made to the 2008 SHLAA. The Civic Society’s concerns on the conclusions in this document as they affect Pontefract have already been mentioned (see letters to Richard Hollinson dated 6/11/08 and 10/11/08). We trust that the SHLAA exercise will be rerun this year using the more pro-active approach outlined in our submission, especially for the three main settlements in Wakefield District.
111858 Adrian Pope	5.3 Methodology page 31	Pontefract Civic Society	Comments noted. Reflects approach set out in Core Strategy.	At the bottom of p 31 there are 3 bullet points. On bullet points 1 and 2 the Society requests that the release of open space and especially school playing fields should be restricted although they are PDL. The additional issues to be considered in this sequential approach could include -the impact of the sites on the surrounding area, - the phased programme for any infrastructure improvements and - the opportunities for the council to be involved in pro-active implementation.
111858 Adrian Pope	Traffic & Transportation	Pontefract Civic Society	Comments refer to Core Strategy and have been considered at Public Examination. Comments about proposals maps noted. Will be considered alongside Site Specific Proposals DPD.	In the Civic Society’s evidence CSSD 71 p2 we quote the draft Core Strategy which states that ‘ It is important that the issues of road transport particularly cars ...increased congestion and further decline of air quality are tackled and that housing and employment developments are planned to prevent them becoming a barrier to the economic revival of the district.’ The Society said it was not convinced that the Ldf will in practice achieve these laudable aims. Our submission went on to remind WMDC that the Transport Bill in 2007 advocated making the most use of the existing road network. (CSSD 71 p3, 12 lines from bottom) which we believe our modified methodology does this effectively. The Civic Society is disappointed by the relative absence of highways or other transport issues in the Consultation document. The Society’s evidence to the Ldf spelled out the traffic problems in Pontefract and how these could be resolved in conjunction with a strategy for housing expansion. (see especially Appendix 1 to the Supplementary Submission to CSSD 71 and Note B attached to CSSD 71) The Society has suggested that the Ldf Proposals map should

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				<p>show the Pontefract Northern Link Road (as part of the Prince of Wales development) both the Town Centre northern relief road and the Eastern Spine road as proposed by the Society, in accordance with the draft Core Strategy paragraph 8.60. (p 4 top line) and a revised line for the Pontefract section of the South East Link Road.</p> <p>We note the comments by the Inspector especially in paragraph 3.4.15 of her recent report on the Core Strategy concerning Pontefract's Western Relief road and about the possible S106 contributions from associated Housing sites. These contributions are now even more important given the recent rejection of the overall Ackworth/Featherstone /Pontefract South-East Link Road in the post 2014 category by the Regional Transport Board.</p> <p>If the Housing Strategy outlined in Para 3.7 above was adopted with the associated highway schemes, most of the Benefits listed in Appendix 3 of the Supplementary Submission to CSSD71 would be realised. This is why we believe housing sites and priorities in a town such as Pontefract should have this strong strategic emphasis (rather than a site by site approach) and at the same time should be linked to transport policies.</p> <p>In this context it is worth recalling that the Ldf Core Strategy is reliant upon the Local Transport Plan which was published in 2006. The next Revision comes into effect in 2011 and its preparation should therefore begin during 2009. It is noted that this Revision will also have to put forward Air Quality Management plans for those locations (such as Townend, Pontefract) where the high levels of pollution are largely caused by road traffic. It is to be hoped that local road and air quality issues will be assessed in parallel with the Housing proposals especially in the three main growth settlements.</p> <p>The Pontefract Civic Society has also been advocating the expansion of rail services to and redevelopment of Monkhill Station. Our evidence (CSSD 71 p 4 Para 3 and Note A p6-8) showed how this could relate well to many of the new housing sites. Again it would be sensible if the improvements at Monkhill could be shown on the Ldf Proposals map.</p>
111858 Adrian	6.2 Core Strategy page	Pontefract Civic Society	Site proposals will be considered in the Site	The Civic Society has followed the Ldf discussion about the amount of Employment land in Wakefield District and we note the summary in this

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Pope	38		Specific Proposals DPD, not the Methodology Paper.	<p>consultation paper</p> <p>The amount of Employment land in the district may appear to be sufficient to meet needs to 2021, but we note at the bottom of p39 with reference to the Ldf Core Strategy, a desire to “provide new employment development close to housing areas giving people the opportunity to work close to where they live” and thus reduce congestion and carbon emissions as well as encouraging more part-time and female work.</p> <p>In this context the limited amount of new employment land within and on the edge of Pontefract, given its status as a Growth Point is of concern. The Civic Society wonders whether there is any scope for the Site-Specific Proposals DPD to identify relatively small additional employment zones in Pontefract if suitable sites can be identified.</p>
39860 Ian Sanderson	Box 2 Environmental Constraints page 12	West Yorkshire Archaeological Advisory Service	The historic environment is covered in the sustainability appraisal. The Settlement Technical Paper was considered as evidence supporting the Core Strategy in 2008 and has been confirmed through public examination. No change.	<p>The methodology for site selection appears logical and coherent to the WYAAS. Our main area of concern is the absence of mention of the full range of the historic environment in the selection of "sustainability indicators" for Wakefield's settlement hierarchy (see Box 2, p.12). Conservation areas are specifically mentioned under Environmental constraints and opportunities, but there is no mention of listed buildings, scheduled ancient monuments, registered historic parks and gardens, registered battle sites, nor UDP Class II archaeological sites (one previously identified as potentially being regionally important and worthy of preservation in situ in Wakefield's UDP).</p> <p>It may be that including these categories of the historic environment may not have changed the identification of the settlement hierarchy in WMDC, but their inclusion should be very much borne in mind when identifying sites that should be excluded from development.</p>
39860 Ian Sanderson	7.2 Environmental Issues page 42	West Yorkshire Archaeological Advisory Service	The historic environment is included in the sustainability appraisal. Amend to clarify this.	<p>The absence of the historic environment from any mention in Section 7.2 (Key Sustainability Issues and Baseline) is worrying and deficient. These categories of site should be identified as those which can not or should not be developed. There should also be a recognition that the issue of the impact on setting needs to be considered should adjacent parcels of land to certain categories of these sites, be considered for development.</p>

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199771 Sally Armstrong	3.4 Settlement Appraisal	Environment Agency	Supporting comment	We are pleased to see that the data sources to be included in the Settlement Appraisal include our indicative flood plain maps and your Strategic Flood Risk Assessment. Both are key data sources for the appraisal of sites.
199771 Sally Armstrong	4.6 Site Assessment Process	Environment Agency	Comments noted. Paragraphs on flood risk have been amended to clarify the Council's approach to flood risk. This is set out in the Core Strategy and has been endorsed by the Environment Agency.	<p><u>Regeneration Status</u> The methodology states that all sites in flood zones 2 and 3 which do not have a 'strong regeneration case' will be rejected. We very much support this approach. However, what constitutes a 'strong regeneration case' is not defined. Each site in flood zones 2 and 3 which is not rejected due to a 'strong regeneration case' will have to clearly and robustly justify its status as a key regeneration site.</p> <p><u>Exception Test</u> Of those sites in zones 2 and 3 which are able to demonstrate a strong and robust regeneration case it must also be demonstrated that the site passes the Exception Test. Information from your SFRA should be used to determine the flood risk to the remaining sites and where concerns remain over the ability of the site to pass the Exception Test and be made safe, these sites must be screened out. We would like to discuss this element of the methodology with you further.</p> <p><u>Functional Floodplain</u> Any sites which your SFRA identifies to be in the functional floodplain (zone 3b) must be screened out at this stage. PPS 25 considers the functional floodplain to be areas comprising land within Flood Zone 3 where water has to flow or be stored in times of flood. Your SFRA states that <i>'functional floodplain should be considered as essential green space infrastructure and be retained for the natural use of flood water wherever possible'</i>. It would be exceptionally difficult to justify any development other than water compatible uses in the functional floodplain as non-water compatible uses in these areas would be contrary to PPS 25. Regarding appropriate uses in the functional floodplain, PPS 25 states that <i>'Only the water compatible uses and the essential infrastructure listed in Table D.2 that has to be there should be permitted in this zone.'</i></p>
40163 Ken Barker	Housing Need page 18	Horbury Community	No information about change in household	First: on page 18 you describe how the future needs are calculated and in b) you state that 'This assumes that the average household size in each

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		Council	size below district level is available. The methodology does reflect different household sizes in individual settlements.	<p>settlement changes at the same rate as in the district as a whole but that the differences between settlements remain.’</p> <p>Taking social history into account this sounds too much like a finger in the wind policy and does not address the reasons why areas are different in the first place.</p> <p>The rate of increase of households must be influenced by the break-up: and make up: of relationships. The reasons for changes in relationships clearly must be a factor, equally the flexibility of the housing stock to cope with these changes is an issue. One nuclear household immediately becomes two following a break-up; the requirement to accommodate children is almost doubled if full access to both parents is to be achieved. However; where children are not involved the stress on the housing stock requirement may not be as great.</p> <p>The reasons for the breakdown in relationships are many and varied but surely some input into these reasons should form part of your methodology. If housing pressure is a factor then the lack of variation or flexibility in the housing stock must be an important issue. Whatever the outcome I feel that not asking the question is a flaw in the methodology that is compounded by the assumption that any change in the rate of relationship breakdown will affect each area in a uniform manner.</p> <p>I can understand that this is not a social affairs document but surely the reasons for making that huge assumption on page 18 need to be clearer.</p>
40163 Ken Barker	Accessibility page 25	Horbury Community Council	Accessibility is by public transport, not by car. The Accessibility Methodology section has been revised.	<p>Second: there seems to be a dysfunction between section 7 Sustainability Appraisal Methodology and the Destination accessibility table on page 25. It would seem that each household should be within a prescribed journey time from a range of facilities and services. Surely in today’s political climate of encouraging public transport and reducing car journeys the figure for car journeys should be less than those for public transport. How else are we going to encourage work and leisure facilities to move closer to the population and reverse the current trend of a heavy reliance on large facilities in Regional Centres?</p> <p>So far as the remainder of the document is concerned the features of the</p>

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				methodology seem to have a self-validating or self-regulating function that are likely to work.
39814 Richard Gough	3.0 Settlement Appraisal	Gough Planning Services	Amend to clarify as suggested.	In view of the receipt of the Core Strategy Examination Inspectors Report and her conclusion that, subject to a number of amendments, the Core Strategy is sound and can proceed to adoption, it is considered that this section should, at the beginning, make specific reference to the fact that the settlement hierarchy is out in the Core Strategy and that the Sites Specific Proposals DPD must conform with the Core Strategy. Consequently, the settlement hierarchy is fixed and cannot be amended in the context of this LDF.
39814 Richard Gough	Housing Requirement page 22	Gough Planning Services	Delivery assumptions and sites assessed and agreed in SHLAA. This will inform the Sites document. No evidence that commitments will not come forward. Sites will be phased and released to deliver housing in short and medium term.	<p>As noted earlier in the report, PPS3 requires that existing commitments should not be included in housing land assessments unless robust evidence demonstrates that the sites concerned can and will be delivered at the expected time. The inclusion of the committed sites in the housing trajectory set out in the Housing Technical Paper is based on assumptions, not robust evidence. Those assumptions (illustrated at Table 16 of the Housing Technical Paper) are not considered to be robust.</p> <p>However, it is recognised that it is highly likely that the majority of sites with the benefit of planning permission will come forward for development and will deliver completed housing at some time. In the current economic circumstances, making realistic assumptions of that timing is problematic. It is perhaps fair to assume that the majority of sites with the benefit of planning permission will have secured such permissions before the recent housing and property market downturn. As such, it is to be expected that the development viability of many of these sites will require a return to previously higher land and house values. The ‘mothballing’ of many sites, including some where construction had already started, by the house building industry illustrates this point.</p> <p>It is therefore submitted that many of the existing committed sites cannot reasonably be expected to deliver completed housing for some years. In order not to place undue reliance on this source of supply, it is submitted that none of the sites with the benefit of planning permission should be relied upon to deliver completed housing for the next three years. It is recognised that many sites will</p>

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				<p>require the grant of new planning permissions to proceed when the economic climate improves.</p> <p>In realistic terms, significant levels of housing delivery in the short term are only likely to result from the release of new sites, where land values can be fixed to reflect the current prevailing market circumstances, not the historic position. Consequently, the Preferred Options Sites is the category of sites which can be expected to deliver housing in the short term, provided that they are expeditiously released for development.</p> <p>For these reason, in order the delivery of the required rates of housing completions in the short term, it is submitted that Preferred Options Sites of all sizes, should be released now and therefore made able to deliver completed housing from 2010 onwards.</p> <p>In addition, recently submitted planning applications, by virtue of their timing, must demonstrate that the housing development of the sites concerned is viable in the current economic climate. It is submitted that such applications, where the land concerned is in sustainable locations and, in particular, comprises previously developed land, should properly be approved. This source of site can be expected to provide housing in the immediate term.</p>
39814 Richard Gough	Site Assessment process page 27	Gough Planning Services	Supporting comment.	The Site Assessment Process is endorsed. The Stage 3 component, which properly allows lower order sites to come forward on advance of higher order sites, where necessary to ensure a continuous supply of the required amount of housing in the settlement concerned (for example deliverable category 2 sites under Stage 2 being afforded priority over undeliverable category 1 sites) is considered of fundamental importance if strategic housing objectives are to be met.
39814 Richard Gough	Existing Employment Land Supply page 36	Gough Planning Services	Employment land has been reviewed and evidence supporting the Core Strategy was found sound. Employment will be taken into account in	It is considered of fundamental importance to both the achievement of a sustainable pattern of development and to secure the economic future of the District that a review of UDP employment land designations be undertaken. Modern employment land requirements are different from those of the past. The most suitable sites best suited to respond to employment requirements are those sited near to Motorway Junctions where large areas of land are available for parcelisation to meet both present and future expansion requirements. Such

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			the Sites document.	areas should properly be safeguarded to meet present and future employment land requirements. Conversely, many of the older employment areas developed in conjunction with river, canal, or rail corridor communications. Land parcels, building sizes and types which met past employment demands are no longer suitable or appropriate to meet current and expected future requirements. It is submitted that such areas should be subject to review and, where possible and sensible, be released for alternative forms of development, particularly housing.
39814 Richard Gough	5.3 Green Belt Methodology page 31	Gough Planning Services	The extent of the Green Belt will only be changed in exceptional circumstances. PAS also needs to be assessed regarding exceptional circumstances.	The suggestion that current Protected Areas of Search for Long Term Development (PAS) are to be reviewed, is objected to. PPG2 clearly states, at paragraph 2.6, that:- “once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances”. This requirement equally applies to proposals to extend the extent of Green Belts as it does to proposals to release land from designation. The PAS areas have been found not to be necessary to ensure the integrity of the Green Belt and have been specifically identified for future development. The only exceptional circumstances which have arisen since that time is the likelihood that it will not be possible to meet all housing and other development requirements in a sustainable manner outside the Green Belt. This justifies the release of land from Green Belt designation, It does not justify an extension of the Green Belt to reincorporate PAS land. For these reasons, it is submitted that none of the PAS land should or could lawfully be considered for designation as Green Belt as part of this review. It is, of course, perfectly proper not to allocate specific areas of PAS land for development if other, more sustainable, alternatives are available.
172416 James Hobson	Housing Requirement Table page 22	Signet Planning for Strata Homes (Yorkshire) Ltd	Table shows indicative figures to guide allocations and demonstrates can meet settlement category percentage, and housing need is	The publication of this table within the Consultation Paper is the first time specific percentages have been allocated to those settlements defined as ‘Other Urban Areas’, which includes Horbury. Within the Inspector’s Report and at page 16 of the Consultation Paper it is envisaged that ‘at least’ 25% of the housing requirement would be directed to these settlements. However, from the table, the cumulative percentage amount for these defined settlements equates to only 24.6% and therefore the objectives of the Core Strategy would

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			<p>in accordance with Core Strategy. SHLAA forms part of the evidence base for identifying sites. The Core Strategy says Horbury will be more constrained than other urban areas. The figure is indicative showing housing need will be met.</p>	<p>not be achieved. This is in contrast to Wakefield, Castleford and Pontefract Urban Areas, all of which appear to comfortably exceed their minimum target levels.</p> <p>Whilst it is recognised that Horbury has experienced housing growth in recent years, it is considered the percentage level of 1.6% is too low and consideration should be given to the appropriateness and capacity of those potential sites coming forward through the SHLAA process.</p> <p>Based on the site being promoted by Strata which features in the SHLAA, it is maintained that there are opportunities within Horbury that are suitable and deliverable with the objective of satisfying important LDF regeneration objectives without compromising services, facilities and infrastructure in the area. As such this would lead to the provision of more dwellings beyond the envisaged requirement of 157 dwellings, as currently anticipated by the local authority.</p> <p>In general terms, therefore, it is considered that it is not appropriate to precisely identify the percentage levels to be attributed to each settlement identified in the category as 'Other Urban Areas'. In our view, this would be counter-productive to delivering the wider objectives of achieving regeneration and sustainable forms of development. Instead, we would recommend that there needs to be an element of flexibility within the housing distribution strategy which should also be guided by the 'bottom up' approach as a result of the appropriateness of key sites being promoted through the SHLAA process.</p>
172416 James Hobson	8.0 Site Selection Methodology page 47	Signet Planning for Strata Homes (Yorkshire) Ltd	<p>The assessment and site selection will take account of Environment Agency Flood Zone classifications and the Council's Strategic Flood Risk Assessment.</p>	<p>It is noted that within the 'Stage 1' Assessment, sites located in Flood Zones 2 and 3 will be rejected at this initial stage but your authority is willing to introduce an exception in Flood Zones 2 and 3a where a strong regeneration case can be advanced. We would welcome this approach and maintain that the site being promoted by Strata can be advanced on the basis of this exception.</p> <p>We are working closely with the Environment Agency (EA) at a technical level, to discuss the site's flood zone classification. Following further modelling work, we may be able to reach agreement with the EA that the site can be technically reclassified as Flood Zone 1.</p> <p>It is therefore considered that another 'exception' should be added to the Stage</p>

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				<p>1 Assessment with this reading as follows: “Working closely with the EA, it can be shown through hydraulic modelling studies that the character of the site can be reclassified from Flood Zone 2 and/or 3a to Flood Zone 1 without any detrimental increase in flood risk elsewhere.”</p>
172416 James Hobson	Housing Requirement Table page 22	Signet Planning for St Paul's Development plc	<p>Table shows indicative figures to guide allocations and demonstrates can meet settlement category percentage, and housing need is in accordance with Core Strategy. SHLAA forms part of the evidence base for identifying sites. The figure for Knottingley significantly exceeds annual housing need, reflects the settlement hierarchy and provides scope for growth.</p>	<p>The publication of this table within the Consultation Paper is the first time specific percentages have been allocated to those settlements defined as ‘Other Urban Areas’, which includes Knottingley. Within the Inspector’s Report and at page 16 of the Consultation Paper it is envisaged that ‘at least’ 25% of the housing requirement would be directed to these settlements. However, from the table, the cumulative percentage amount for these defined settlements equates to only 24.6% and therefore the objectives of the Core Strategy would not be achieved. This is in contrast to Wakefield, Castleford and Pontefract Urban Areas, all of which appear to comfortably exceed their minimum target levels.</p> <p>Within the Core Strategy, Knottingley is specifically identified as a settlement to focus housing renewal and development and employment opportunities. It also forms part of the Five Towns initiative. Within this context, it is considered that the suggested 3.8% of the net housing requirement proposed to be directed to Knottingley is too low.</p> <p>Based on the site being promoted by St Paul’s Developments which features in the SHLAA, it is maintained that there are opportunities within Knottingley that are suitable and deliverable, that would assist in achieving key regeneration objectives without compromising the services, facilities and infrastructure of the area. As such, this would lead to the provision of more dwellings beyond the estimated requirement of 710 dwellings as currently anticipated within the table. In general terms, therefore, it is considered that it is not appropriate to precisely identify the percentage levels to be attributed to each settlement identified in the category as ‘Urban Areas’ since in our view this could be counter-productive to ensuring the deliverability of wider regeneration sustainable objectives. Instead, we would recommend that there should be an element of flexibility within the housing distribution strategy which should also be guided by</p>

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				<p>the 'bottom up' approach as a result of assessing the appropriateness and availability of key sites being promoted through the SHLAA process. In general terms, therefore, it is considered that it is not appropriate to precisely identify the percentage levels to be attributed to each settlement identified in the category as 'Urban Areas' since in our view this could be counter-productive to ensuring the deliverability of wider regeneration sustainable objectives. Instead, we would recommend that there should be an element of flexibility within the housing distribution strategy which should also be guided by the 'bottom up' approach as a result of assessing the appropriateness and availability of key sites being promoted through the SHLAA process.</p>
172416 James Hobson	8.0 Site Selection Methodology page 47	Signet Planning for St Paul's Development plc	<p>The assessment and site selection will take account of Environment Agency Flood Zone classifications and the Council's Strategic Flood Risk Assessment.</p>	<p>It is noted that within the 'Stage 1' Assessment, sites located in Flood Zones 2 and 3 will be rejected at this initial stage. However, your authority is willing to introduce an exception in Flood Zones 2 and 3a where a strong regeneration case can be advanced. We would welcome this approach and maintain that the site being promoted by St Paul's Developments can be advanced on the basis of this exception.</p> <p>Extensive flood risk technical studies have been undertaken by St Paul's Development and we have been working closely with the Environment Agency (EA) to address these issues. Part of the site is currently shown to be within Flood Zone 3 but the flood map is based on the 'undefended' situation and presents a rather artificial scenario.</p> <p>Detailed hydraulic modelling studies have been carried out to examine both over topping and a critical breaching of the River Aire defences in the proximity of the site. These studies have been based on the 1% annual probability flood (equivalent to the definition of Flood Zone 3) and have also taken into account the greater flows and associated higher levels resulting from the effects of climate change. Furthermore the critical breach scenarios have incorporated very conservative assumptions, such as the relevant flood plain washlands being completely full prior to the breach, and secondary breaches being incorporated across the road embankment which runs between the river and St Paul's site.</p> <p>Even under these extreme conditions, it has been shown that the site is not at</p>

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				<p>risk of flooding from the River Aire. In order to cope with the 'residual' flood risk associated with the 'undefended' scenario, it is proposed to lift the site levels above those associated with Flood Zone 2 (ie, the 0.1% probability or 100 year event).</p> <p>Since the site is currently not at risk of flooding, such raising of the site levels would not adversely impact on flood risk elsewhere. The EA are satisfied with the methodology for these technical studies and have accepted the findings. It is therefore contended that the chemical works site may be raised to such a level that would effectively place it in Flood Zone 1.</p> <p>Within the context of this detailed explanation, it is considered that another 'exception' should be added to the Stage 1 Assessment with this reading as follows:</p> <p>“Working closely with the EA, it can be shown through hydraulic modelling studies that the character of the site can be reclassified from Flood Zone 2 and/or 3a to Flood Zone 1 without any detrimental increase in flood risk elsewhere.”</p>
Mark Finch	4.4 page 20	Drivers Jonas for Waystone Ltd 39923	All sites, including existing commitments/ preferred options allocations will be re-assessed in the SHLAA which will be part of the evidence base alongside other technical evidence for preparing the Sites document. Windfall sites are not included in the housing requirement as determined at the	<p>In terms of context, Castleford is identified as a priority area for development – it is a Principal Town in the Regional spatial Strategy, it is a focus of priority for regeneration in the Wakefield Community Strategy, it is part of the Five Towns urban renaissance programme, and is a focus of Housing Growth Point Status. In progressing the study work, it will be important to consider the Castleford sub-area as a specific housing market area, identifying a full range of sites that can accommodate the need for the mix and type of housing required within the locality.</p> <p>Through the Settlement Appraisal, Castleford is identified as being within the top category of settlement. Wakefield and Castleford have the highest number of facilities within the District. We note that the urban envelopes of the settlements are due for review as part of the Site Specific proposals DPD. This will be a general exercise, particularly given commentary from the Inspector at the recent Core Strategy and Development policies Development Plan Documents, if spatial growth aspirations are to be realised.</p> <p>In relation to meeting the housing and growth point requirements (section 4.4 of</p>

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			<p>Core Strategy Examination. Amend text to remove statement about reliance on windfall housing.</p>	<p>the methodology paper) there is reference to existing commitments, windfall developments and allocations. There are some fundamental points to be made on this section.</p> <p>Existing commitments and allocations need to be re-appraised to ensure they are developable and deliverable. Reference should be made in the Methodology to the need to re-appraise such categories of sites. The economic context at the time certain permissions were granted may now be materially different. The economic appraisal of sites must be a crucial component to the site selection assessment.</p> <p>Furthermore, there should be no reliance on windfalls, ie they should not be counted as part of meeting the housing requirement.</p>
Mark Finch	5.3 Green Belt Methodology page 30	Drivers Jonas for Waystone Ltd 39923	<p>This approach is set out in the Core Strategy and site selection for the Sites Specific Proposals must conform to CS policies. Green Belt sites will be subject to SA and considered alongside and in the same way as other sites.</p>	<p>The methodology seems to adhere to a sequential approach to site selection (section 4.6). Green Belt sites in particular are seen as automatically falling into the lower priority category. The Regional Spatial Strategy states that in the Leeds City Region where significant growth is proposed, it is possible that the most sustainable locations to accommodate some of this development may be within the Green Belt (RSS para 2.46). Particularly given the Inspector's additional support for a Green Belt review to accommodate growth, it is important that the suitability of all sites is considered with no fixed starting points taken (ie all sites identified in the SHLAA and other processes should be considered against specific criteria including social, economic and environmental factors, rather than being demoted as a result of current policy constraints).</p> <p>The Green belt methodology, and the comment that Green Belt sites will only be considered for allocation when all suitable sites within the urban areas have been allocated, needs to be reconsidered in that context.</p>
40076 Rick Hayward	General	Wakefield Civic Society	<p>Comments noted.</p>	<p>Overall, the proposed methodology is sound. the question that arise flow from how the strategic overview is translated into the particular. Experience shows that there is a danger that guiding principles may too easily become rigid rules that exclude the complexities of reality on the ground. This can easily translate into the dominance of quantitative considerations over the more difficult qualitative issues that are</p>

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				essential in the development process. By definition, the methodology former on quality, not a problem as long as flexibility remains at the next level to apply the methodology appropriately rather than rigidly. Few, for instance, would argue with the settlement hierarchy outlined in the methodology. However, it has to be recognised that a four-part division is (necessarily) a simplification. Problems arise when that simplification is translated into rigidity.
40076 Rick Hayward	Section 4 Housing Methodology	Wakefield Civic Society	Housing distribution density has been considered at the Core Strategy Public Examination and figures for settlements have been established. Densities on individual sites will reflect local context and will accommodate a mix of housing of different densities.	A major concern for the Civic Society is the quality and density of new-build housing in the urban area of Wakefield. We fully accept the general principle that a large proportion of housing will be built within the Wakefield area. We also accept the rationale that this housing should be at higher densities. However, we do have reservations about how this is translated into actuality: (i) We feel that the methodology must balance the demands of quantity with quality - particularly if the urban renaissance objectives are to be met. This is not an unfounded fear. Our experience over the period since the upper guideline on density was revised is that there has been a tendency to approve densities beyond those that are desirable within a particular context. Whilst the city will contain sites that are suited to dense apartment-type developments, a general tendency to encourage densities above 60 dwellings ph will be detrimental. It has to be recognised that much the urban area already has housing at a high density, and that in-filling at even higher densities, without careful balancing of considerations, will be detrimental to the liveability of the city. This will inevitably contradict the requirement for communities to be mixed, as the more affluent continue the suburban drift. Thus we would question whether a firm 'at least 30%' is an achievable proportion of new homes to be absorbed within the Wakefield urban area if quality of living environment is given its due weight. Similarly, it may be necessary for some smaller settlements to take more growth. In summary, the principle needs to be balanced by a wider practical view - it should not become a

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				straight-jacket.
40076 Rick Hayward	Section 4 Housing Methodology	Wakefield Civic Society	Comments noted, this element will be considered as part of the sustainability appraisal of sites	(ii) Related to the above, we see a danger that open and green space within the urban area - and particularly the central area - will be under pressure. Urban green space does not have the same protection as green belt land, but is just as crucial - often more so, given the population dependent on it.
40076 Rick Hayward	Section 5 Green Belt Methodology	Wakefield Civic Society	A sustainability appraisal of potential Green Belt sites will be carried out and the impact on open space, ecology and the landscape will be considered within this process.	(iii) As a corollary, we welcome a judicious review of the green belt - in our view, if the demand for additional housing is to be met without creating excessive pressure on existing developed areas, then it is inevitable that *some* marginal areas of the green belt will have to be given up. The review will have to be undertaken carefully, and it is probably the case that instead of necessarily seeking large sites, the best approach will be to look for an accumulation of smaller sites that do not vitiate the overall integrity of open land. A topical example - admittedly a result of commercial kite-flying, rather than reasoned consideration - is the area bordering the Aire and Calder navigation to the east of Wakefield. From a simplistic viewpoint, this area might appear as easy meat for development. It is, in fact, an extremely species rich area and a green lung for one of the poorest areas in the District. Whilst some marginal areas might be suited to some housing development, the wholesale sacrifice would be extremely crass. (It might be noted in passing that the bad dream of an eastern bypass has already led to the sacrifice of valuable housing land on the Power Station site). This is simply an illustration of the need to translate overall strategy into informed practice.
40076 Rick Hayward	Section 6 Employment Methodology	Wakefield Civic Society	Comments noted.	We have little comment to make on the methodology re. employment land - the framework is sound. What is clear is that, despite some contrary pressure, the motorway network remains a prime asset for the District, and to resist the development of appropriate network sites would not be in the interests of local employment.
130742 Colin Holm	Box 2 page 12	Natural England	'Nature conservation sites' refers to	Natural England welcome the inclusion of nature conservation sites in Box 2 (page 12). However, we would suggest that this should be further defined as it

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			<p>nationally and locally designated sites and are covered in the sustainability appraisal. The Settlement Technical Paper methodology was considered as evidence supporting the Core Strategy in 2008 and has been confirmed through public examination.</p>	<p>is not clear whether this refers to nationally designated sites or whether it includes local sites and UK Biodiversity Action Plan priority habitats and species, the presence of which may have a bearing on the potential for particular patterns of settlement growth. We would also advise inclusion of Regionally Important Geological Sites within this category.</p>
130742 Colin Holm	3.4 page 13	Natural England	<p>Relevant technical data will be taken into account in the sustainability appraisal and assessment under habitats regulations. The Settlement Technical Paper methodology was considered as evidence supporting the Core Strategy in 2008 and has been confirmed through public examination.</p>	<p>In section 3.4 we would advise that data pertinent to natural environment constraints can be accessed from sources such as the local records centre and from http://www.naturalengland.org.uk/publications/data/default.aspx .</p>
130742 Colin Holm	4.6 Stage 3 page 28	Natural England	<p>The Appropriate Assessment will identify any</p>	<p>The 3 stage process to site assessment would appear to be appropriate. However, in stage 1, the presence of a Special Area of Conservation or Site of Special Scientific Interest would warrant a 'XX' score. Development of locally</p>

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			detrimental impacts on the SAC and such a site would not be selected for designation.	designated nature conservation sites too may warrant a 'XX' score, and Wakefield, in considering such sites, should consider whether sites allocations would be compatible with their own criteria-based policy for local sites (D10).
130742 Colin Holm	5.0 Green Belt Methodology page 30	Natural England	The Green Belt review will take into account the purposes of including land in the Green Belt and landscape character will be considered in the Green Belt review. Amend methodology text to clarify this. The technical consultations and sustainability appraisal will address green infrastructure issues including landscape and ecology. The Council has its own accessibility	It will be important to consider the important role that green belt plays in those objectives listed at 1.6 in PPG2 ('the use of land in green belts'), including to provide opportunities for access to the open countryside, to retain attractive landscapes close to where people live, to secure nature conservation interest and to retain land in agriculture and forestry. Whilst these factors are not material to the continued protection of green belts, they may represent constraints to development regardless of its green belt status. In particular, Natural England would be particularly keen to emphasise that individual areas of land may play a variety of roles, such as providing green infrastructure to a community that would otherwise not have access to sufficient quantities of it, and providing an attractive landscape or an ecological resource. Given that all sites will be subject to sustainability appraisal, we would wish to see an assessment of how sites contribute to ANGSt targets ¹ , landscape quality (as reviewed in Wakefield's Landscape Character Assessment), whether they contain public rights of way and whether there are any known or identifiable UKBAP or local BAP habitats. We would also wish to see sites assessed for whether they contain important hedgerows or ancient woodlands, populations of protected or priority species, habitat networks or any locally, regionally, nationally or European designated sites. Given that green belt land is often agricultural land it will be important to include an assessment of agricultural land grade when undertaking the green belt

¹ Natural England's Accessible Natural Greenspace Standards (ANGSt) require that:

- No person should live more than 300m from their nearest area of natural green space of at least 2ha in size
- Provision of at least 1ha of local nature reserve pre 1,000 population
- There should be at least one accessible 20ha site within 2km of home
- There should be one accessible 100ha site within 5km of home

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			<p>targets set out in the Green Space Strategy and Core Strategy and sites will be assessed against these. The ANGSt targets are not practical in a metropolitan district such as Wakefield.</p>	<p>review. Further to this point, it should be noted that Grade 3 Agricultural Land is subdivided into Grade 3 (A) and Grade 3 (B), the former falling within the definition of Best and Most Versatile Land. Although data on Best and Most Versatile land grades is available on www.magic.gov.uk, Magic data does not make the distinction between the two grade 3 types as it is based on maps which preceded the subdivision. Natural England's Evidence Team may be able to supply maps based which include the subdivision, but coverage is not complete. For further information on accessing data relating to soils please do not hesitate to contact me.</p> <p>Finally, it will be important to ensure that the green belt continues to meet the purposes listed at 1.5 in PPG2 ('purposes of including land in green belts'). Natural England would advise that the criteria I have mentioned above are scoped into the sustainability appraisal.</p>
130742 Colin Holm	6.0 Employment Methodology page 33	Natural England	<p>The sustainability appraisal objectives have been agreed. The technical consultations and SA will cover issues such as biodiversity and landscape. The Council has its own accessibility targets set out in the Green Space Strategy and Core Strategy and sites will be assessed against these.</p>	<p>Natural England would emphasise that the sustainability appraisal will have a significant role in determining the preferred sites for employment. As with other studies, we would wish to see assessment of the biodiversity, landscape and recreational access potential of sites, including:</p> <ul style="list-style-type: none"> • How sites contribute to ANGSt targets; • landscape quality (as reviewed in Wakefield's Landscape Character Assessment); • whether sites contain public rights of way; • Whether there are any known or identifiable UKBAP or local BAP habitats, important hedgerows, ancient woodlands, populations of protected or priority species, habitat networks or any locally, regionally, nationally or European designated sites
130742 Colin Holm	7.0 Sustainability Appraisal page	Natural England	Comments noted.	<p>We agree that an appropriate process for SA has been described in this section, and would encourage Wakefield to incorporate the points related to SA that we have made above under appropriate SA objectives.</p>

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130742 Colin Holm	Appropriate Assessment page 45	Natural England	Appropriate Assessment will be carried out for all sites put forward in the Sites document, and this includes consideration of cumulative impact.	The approach to appropriate assessment is satisfactory. It will be necessary to assess sites that arise through the studies described in this methodology consultation paper for likely significant effects. It is also important to emphasise that the assessment for likely significant effects should also consider 'in combination effects' with other plans and projects in line with the legislation.
Toni Rios	Settlement Methodology page 10	Highways Agency	The Core Strategy and Settlement Appraisal Technical Paper were considered at Public Examination. As Ossett and Horbury are areas of constraint development within these towns will be limited.	We note that Core Strategy policies indicate a majority of development will be focussed in Wakefield, Castleford and Pontefract with some development of lesser scale in Featherstone, Normanton, Knottingley, South Elmsall and South Kirkby. We do have some concerns about the reference to Horbury and Ossett. The two communities do not figure in the Spatial Vision 5.4 in the Core strategy. Whilst paragraph 6.5 of the Core Strategy states that in "some urban areas such as Horbury, Ossett and Stanley/Outwood, this means a policy of growth restraint", the settlement appraisal adds Stanley, Outwood, Ossett and Horbury to the list of urban areas that are considered to be the most suitable to accommodate economic growth. The particular concern is that traffic generated by any substantial development in the Ossett/ Horbury area could have an adverse impact on the Strategic Road Network (SRN) in the locality.
Toni Rios	Settlement Methodology Sustainability Indicators	Highways Agency	Comments noted.	The constraint map shows AQMAs as one constraint, but there is no reference to potential AQMAs where development would create an AQMA by virtue of an adjacent strategic or principal road. The Agency, in responding to the Site Specific development proposals, will be particularly concerned to avoid the possibility of creating new AQMAs.
Toni Rios	Housing page 21	Highways Agency	Comments noted. Such measures will be taken into account.	The ability of the SRN to cope with additional development related traffic and/or feasibility of effective soft and hard mitigation measures will be relevant considerations in assessing deliverability.

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Toni Rios	Housing page 25	Highways Agency	Comments noted.	We wish to point out that the main concern of the Agency is with the longer inter and intra district journeys to and from work as they are the ones that are more likely to use the SRN at times when traffic is the heaviest.
Toni Rios	4.6 page 27	Highways Agency	Amend text to make reference to the SRN.	Under the heading Stage 1 reference is made to impact on the local highway network. Impact on the SRN will also be a constraint.
Toni Rios	4.6 page 27/28	Highways Agency	The Accessibility Model would give such sites a low score. In consultation with METRO mitigation measures will be put forward in such cases.	In Stage 2 reference is made to accessibility of public transport, what happens where an extension to a settlement is not served by or accessible to existing public transport? Is it simply assumed that a bus service will be provided or is some more rigorous approach envisaged?
Toni Rios	4.6 page 28	Highways Agency	Comments noted.	In Stage 3 it should be noted that development constraints will include SRN capacity and the deliverability of effective mitigation on soft and/or hard forms.
Toni Rios	SA Methodology page 42	Highways Agency	Comments noted.	There are references to AQMAs on the M1 and A1 and it is stated that development decisions should not exacerbate the situation. It is also important to avoid the potential risk of any further AQMAs being declared as a result of residential development close to the SRN in other locations. The key sustainability appraisal objectives for transport (SA10, SA11) and environmental impacts (SA13 and SA14) are considered to be appropriate.
Toni Rios	SA Methodology page 44	Highways Agency	Yes. Sustainability appraisal is carried out at each stage of producing the DPD.	There are references to the SA of Submission Proposals, the Final sustainability Appraisal Report and the Site Specific Proposals Submission document. Is there a final version of the Sustainability Appraisal Report to come that will accompany the Site Specific Proposals Submission Document?
Toni Rios	Site Selection Methodology page 47	Highways Agency	Comments noted. Amend Site Selection Methodology section revised to make reference to SRN.	In Stage 1 there is another reference to the local highway network. Impact on the SRN may also be a constraint.