

# Sustainability Appraisal Scoping Report

Comments and Feedback

March 2009





**Sustainability Appraisal Scoping Report November 2008**

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## 1. Introduction

1.1 This consultation statement provides details of the consultation undertaken, the comments received and the Councils response to the Local Development Framework (LDF) Sustainability Appraisal Scoping Report. All the comments received during the consultation have been carefully considered by the Council and appropriate actions will be taken as identified in this report. The Sustainability Appraisal will be used to assess how sustainable the policy approaches within the LDF are. Where issues over the sustainability of documents making up the LDF are noted the Sustainability Appraisal can be used to identify amendments to the documents to improve their sustainability.

## 2. Consultation Process

2.1 The Council began work in earnest upon the LDF In January 2008 much of the early work focused upon gathering an evidence base and early community engagement. The first formal consultation stage upon the LDF was the Core Strategy Issues and Options consultation. This consultation ran for 11 weeks between 17<sup>th</sup> November 2008 and 30<sup>th</sup> January 2009. The consultation also included the Sustainability Appraisal Scoping Report, and two parts of the evidence base; the Green Belt Review Methodology and Settlement Hierarchy Model. Each of the documents was available both in hard copy and as interactive versions on the council website. In addition leaflets were produced to explain the LDF process and to summarise the Sustainability Appraisal Scoping Report and Core Strategy.

2.3 To compliment the documents and leaflets a number of consultation events were also undertaken. This included 6 drop-in events at venues across the district and 12 workshops/public meetings. Table 1 indicates the number of responses received and the number of people attending events.

**Table 1: Responses to the Consultation**

Consultation method	Number of respondents	Number of comments received
Core Strategy Issues and Options Documents	178	780
Green Belt Review Methodology	20	59
Settlement Hierarchy Methodology	10	27
Sustainability Appraisal Scoping Report	10	47
Attending events	389	-

### 3. Sustainability Appraisal Scoping Report Consultation

3.1 The consultation ran from 17<sup>th</sup> November 2008 to 30<sup>th</sup> January 2009. This stage of the consultation is used to ensure the relevant sustainability information is included to produce a robust framework that will make sure sustainability considerations are built into LDF documents throughout their preparation.

3.2 The consultation resulted in 47 comments, the majority of which will require further investigation relating to specific targets, indicators, and decision making criteria.

**Table 2 – Sustainability Appraisal Scoping Report Comments – Action Required**

Resp No.	Full Name	Organisation Details	Section/ Para/Table	Response Categories	Summary of Comments	Council Response
8	Mr Ian Smith	English Heritage		Further investigation required	English Heritage strongly advises that the conservation staff of the Council and WYAS are closely involved throughout the preparation of the SEA/SA of the plan. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the HER (formally SMR): how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.	Your comments on the involvement of conservation staff at the Council and WYAS are noted, and further work on the SA will require work with both internal and external partners.
15	Toni Rios	Network Planning Manager Highways Agency		Agree - further action	The SA should accurately represent the Highways Agency when reviewing other plans strategies and programmes - i.e. conditions on the SRN is no worse following a development than would be	The strategic objectives of the Highways Agency should be reviewed and reflected in Appendix A and inform the development of the Sustainability Appraisal.

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					the case if the development did not happen; the SRN is for long distance strategic traffic; environmental consequences of proposed developments; mitigation of any adverse effects on the SRN; ensure adequate arrangements for monitoring are in place.	
42	Mr Colin Holm	Government Team (West) Natural England	1.20	Further investigation required	In addition to our comments on the consultation documents I would be happy to discuss your proposals for screening for the need to undertake appropriate assessment of the Core Strategy(1).	The comments concerning the Appropriate Assessment are noted and the Council will contact Natural England shortly to discuss this area of work.
16	Toni Rios	Network Planning Manager Highways Agency	2	Agree - further action	Refers to circular 02/2007 and involving the agency in the LDF. Regional Network Report should be reviewed. Concerns over developments impacts on air quality on or beside the SRN. Highway's Agency Biodiversity Action Plan should be reviewed. Welcomes the recognition that account must be taken of emerging LDF documents and development proposals from neighbouring authorities. Agree that reducing the need to travel, accessibility, minimising car use are key considerations.	Circular 02/2007, the Regional Network Report, and the Highway's Agency's Biodiversity Action Plan should be reviewed and inform the development of the Sustainability Appraisal. Your comments already provided on these documents in your response have been noted. We note your comments in seeking to ensure accessibility, reducing the need to travel and minimising car use are key considerations, and these will, through the sustainability appraisal, play a role in informing the development of options, allocations, and policies in the Core Strategy. Due account will be taken of the impact of policies and proposals on climate change, human health, biodiversity and air and water pollution through the SA framework.
26	Mr Colin Holm	Government Team (West) Natural England		Agree - further action	Appendix 1 should be updated to include the following plans / programmes/ strategies: The European Landscape Convention; European Strategy on Sustainable Development (2001) • Kyoto	We note your comments on additional plans / programmes/ strategies, each will be reviewed and added to Appendix 1 with a summary of the main points that can inform the development of the SA.

Resp No.	Full Name	Organisation Details	Section/ Para/Table	Response Categories	Summary of Comments	Council Response
					Agreement • The Sixth EAP of EC • Birds Directive • The Water Framework Directive and the Production of River Basin Management Plans • EU Framework on Waste	
27	Mr Colin Holm	Government Team (West) Natural England		Agree - further action	Appendix 1 needs to be updated with the additional plans/programmes/strategies: The Historic Environment: A Force for Our Future • Urban White Paper: Out Towns and Cities: The Future (DETR 2000) • Airport White Paper • Biodiversity Action Plan for England • BREEAM Eco Homes • Waste Strategy • Countryside and Rights of Way Act 2000.	We note your comments on additional plans / programmes/ strategies, each will be reviewed and added to Appendix 1 with a summary of the main points that can inform the development of the SA.
28	Mr Colin Holm	Government Team (West) Natural England		Agree - further action	Appendix 1 needs to be updated with the additional plans/programmes/strategies: -Regional Sustainable Development Strategy - 'Building a Better Quality of Life' – A Strategy for More Sustainable Construction	We note your comments on additional plans / programmes/ strategies, and will review the sustainable construction strategy. However, the Regional Sustainable Development Framework has been replaced by the Integrated Regional Framework, which has been reviewed and is already contained in Appendix 1.
29	Mr Colin Holm	Government Team (West) Natural England		Further investigation required	Natural England wish to see a Landscape Character Assessment included to inform the SA.	Further work needs to be carried out as to establish whether or not some form of Landscape Character Assessment is required as part of the evidence base for the Core Strategy.
30	Mr Colin Holm	Government Team (West) Natural England		Agree - further action	Paragraph 2.17 – Natural England recommends adding the following bullet points: • Need to consider green infrastructure provision for the planning of sustainable patterns of growth; • Need to protect and enhance landscape character and local distinctiveness.	Your comments on the addition of points concerning green infrastructure and the protection and enhancement of landscape character and local distinctiveness have been noted, and a further review of the relevant documents will take place to ensure these are reflected in the SA.

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17	Toni Rios	Network Planning Manager Highways Agency	3	Agree - further action	Forecasts for future levels of traffic on the Strategic Road Network (SRN) with and without proposed developments should provide a helpful contribution to the evidence base.	Contact the Highways Agency once this information is available.
18	Toni Rios	Network Planning Manager Highways Agency	4	Agree - further action	Section 4.2 should refer to the need to recognise the Strategic Road Network (SRN) is not expected to cater for the traffic demands of new / proposed developments, the ethos is to ensure conditions are no worse after taking account of traffic generated by proposed developments than they would be without the same proposed developments.	Your comments on the impact of new developments on the SRN are noted and need to be considered when developing the SA framework that will inform the development of the options, policies and proposals.
44	Mr Anthony Rae	Friends Of The Earth (Calderdale)	4	Agree - further action	The statement 'the district is to adapt to and mitigate the impacts of climate change' is insufficiently precise. In the context of the CCA it should refer instead to the district 'to achieve required emissions reduction targets';	The summary of issues concerning climate change will be amended to reflect the needs of the National, regional, and local targets.
31	Mr Colin Holm	Government Team (West) Natural England	4.2	Further investigation required	Important to clearly identify the need to protect and enhance landscape character and local distinctiveness, something which should be fully addressed by the SA. A Landscape Character Assessment is needed.	Further work needs to be carried out as to establish whether or not some form of Landscape Character Assessment is required as part of the evidence base for the Core Strategy.
19	Toni Rios	Network Planning Manager Highways Agency	5	Further investigation required	Support relevant Sustainability objectives 5, 9, 10, 11, 14 and 18, although there is no objective relating specifically to reducing the need to travel and reducing medium / long distance intraregional commuting by car.	We note your support of SA Objectives 5, 9, 10, 11, 14 and 18. Although there is no objective relating specifically to reducing the need to travel and reducing medium and longer distance intraregional commuting by car, one objective is concerned with reducing the effect of traffic on the environment, and the underlying indicators for this



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					Accessibility studies will enable comparison between the Council's and Highway's Authority and data, and provide opportunities to review the criteria, indicators and targets included in the SA framework. Welcome the focus on Air Quality Management Areas, but question over the focus on water quality in Canals.	objective do relate to car travel. We would welcome any information in terms of accessibility, in order for us to consider amending or adding to the indicators already in the SA framework. In terms of water runoff, we note your concern over the impact of development on water quality and will research this point further.
45	Mr Anthony Rae	Friends Of The Earth (Calderdale)	5	Further investigation required	SA Objective 11 'to reduce pollution levels including the carbon footprint of the district'. The term carbon footprint is used in precisely and usually applies just to individuals or household's and therefore excludes business emissions. Instead may be referred to 'reduce CO2 emissions to target levels'	The term Carbon Footprint used in SA Objective 11 may need to be reviewed, and consideration should be given to using the phrase suggested.
46	Mr Anthony Rae	Friends Of The Earth (Calderdale)	5	Further investigation required	SA Objective 17 talks about the achievement of 'economic growth'. This is rather old-fashioned and should refer instead to sustainable development, or more usefully to the low carbon economy.	Your comments on the use of 'economic growth' are noted - however, use of 'sustainable development' may be too broad a term for a specific objective. Consideration will be given to some form of reference to the low carbon economy.
14	Mr D R Witcher	Shibden Valley Society	5.3	Further investigation required	Support SA Objectives 4,7,9,10,12. For SA 4, Concerned that no target is set for the 'Condition of the Rights of Way' indicator. Regarding SA 7, 'To retain, protect and create a quality, locally distinctive built environment', it is surprising no reference is made to the need for design guidance. The society supports the protection and enhancement of historic sites and	Your points concerning the absence of decision making criteria, targets and indicators are noted. Further investigation and research is required to establish targets where these are available - any targets proposed need to be derived from information that is available, and is consistent with other strategies across the Council and other agencies. In relation to design guidance, there is likely to be some form of design policy in the Core Strategy (and the Land Allocations and Designations DPD), however, consideration needs to be given to the inclusion

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					buildings, and their setting. It also wishes to see a reduction in the amount of derelict and degraded land, although it is again concerned there are no targets for these indicators. SA9 - 'To reduce the effect of traffic on the environment'. The Society wishes to see reduced traffic volumes, especially on Minor Roads. To meet this objective, the society urges that there any further housing in Northowram be resisted, enhanced bus services, car sharing and off peak travel should be encouraged, and a re-phasing of traffic signals at Stump Cross / New Bank to improve traffic flow into Halifax. SA Objective 10 - 'To protect and enhance biodiversity'. Generally supported, but fears that any erosion of the rural character of the Valley could have an adverse effect of biodiversity. Although fully support SA Objective 12 'To protect and enhance the natural, semi natural and man made landscape', the society is concerned over the absence of any decision making criteria, indicators or targets relating to Landscape per se. The society urges such an omission to be rectified in the SA and for specific policies to be included in the LDF. Any policies should include the Shibden Valley.	of some form of decision making criteria/indicator/target relating to design. Some of the points raised against SA Objective 9, are outside the responsibility of the LDF, however, your points are noted and will be forwarded to the relevant departments.
9	Dr Lesley Mackay		Table 4	Further investigation	Targets for reducing the effect of traffic on the environment (SA Objective 9) are	The targets set are in line with the West Yorkshire Local Transport Plan 2006-2011, and are considered to be the

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				required	too low. There is already a substantial increase in the demand for rail travel year on year which would exceed the peak time rail patronage target of 12% by 2010/11 without any additional input from the Council. Targets need to be challenging, not simply following the present trend. Because buses share the road with vehicles, it is unlikely that the target of a 17% increase in bus patronage by 2015/16 will occur. If this target is to be met, substantial interventions will be required to reduce vehicle numbers on key routes in the region (e.g. road charged; employer car parking charges) which are not addressed in the LDF documents.	most relevant targets at the moment. Due to the Core Strategy's timetable, it is likely that new targets will emerge during its preparation, and these will need to be built into the SA Framework.
24	Ms Meryl Leung	Environment Agency	Table 4	Further investigation required	The Environment Agency wish to see flood risks arising from land use and climate change recognise, understood and fully taken into account in planning decisions. The agency will help planners and developers to understand their roles in sustainable flood risk management. The target for the number of planning applications approved contrary to EA flood risk advice should be zero. Question over the wording of indicator 'Properties at risk of flooding' - how will this be defined? All properties in flood risk zone 2 & 3? Will the Strategic Flood Risk Assessment (SFRA) be used to establish the most up to date flood risk	Further work and consultation with the EA would assist in improving the information database concerning flood risk in the area. The indicator 'properties at risk of flooding' needs further consideration. The SFRA will be an important part of the evidence base for the LDF.

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					areas? Flood risk from other sources should be considered - i.e. canals, surface water, ground water. The EA hold information on the number of properties that fall within defined flood warning areas - if this is of use please contact the EA.	
25	Ms Meryl Leung	Environment Agency	Table 4	Further investigation required	The EA would wish to see an additional decision making criteria for the LDF added to SA Objective 12 'To protect and enhance the natural, semi natural, and manmade landscape' - the question 'Will it protect rivers and streams?' should be asked, especially since rivers and streams have been identified as priority habitats in the Local Biodiversity Action Plan. This approach would also be in line with the Regional Spatial Strategy. Watercourses are also required to achieve 'good' ecological status through the water framework directive. Ensuring that river corridors are protected and enhanced will help to improve connectivity and benefit biodiversity. Length of river improved could be used as an indicator. The EA suggests that the indicators and targets are taken from those in the draft Rivers and Streams Habitat Action Plan for Calderdale. In addition we would also like the council to consider adding a target for opening up culverts.	Your points regarding the protection of rivers and streams are noted, and further work will be carried to ensure this is reflected in the SA report, including a review of the draft Rivers and Streams Habitat Action Plan for Calderdale.
2	Mr Ian Smith	English Heritage	Table 5	Agree -	A number of the proposed Decision-	The SA Framework will be amended to reflect your

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				further action	making Criteria under SA objective 7 would be more appropriately located within other of the SA objectives:- "Will the built environments effect on the planet be reduced" would be better located within SA objective 11 (which deals with carbon footprint). "Will it reduce the amount of derelict and degraded land" would be more appropriate within SA objective 14 (which deals with the efficient use of land).	comments on the two Decision Making Criteria, and be moved to SA Objective 11 and SA Objective 14 respectively.
10	Mr & Mrs Mark & Amanda Tattersall		Table 5	Further investigation required	We believe that a target of preserving and developing wildlife corridors is essential to achieving the objective of protecting and enhancing biodiversity (SA objective 10). Wildlife corridors are necessary for the preservation of biodiversity. Without wildlife corridors, local species populations can become unviable because of low numbers and there is also a danger of inbreeding, placing further pressure on the species. We suggest that the table be amended at SA objective 10 to include a target of preserving and developing wildlife corridors.	Your comments on the importance of wildlife corridors are noted, and further work will be carried out to investigate the possibility of developing an indicator relating to these designations.
11	Mr & Mrs Mark & Amanda Tattersall		Table 5	Further investigation required	We are concerned that there are no targets for protecting the green belt and agricultural land in this table (SA objective 12). It is not clear how this objective can be achieved if there is no target.	Further investigation is required to establish whether there are any national / regional / local targets relating to Green Belt and agricultural land.

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47	Mr Anthony Rae	Friends Of The Earth (Calderdale)	Table 5	Further investigation required	The target for traffic growth in Halifax is apparently that this should be restricted to 3% to 2011. What about the period after, and what about a reduction? Similarly the target for the carbon footprint has by mistake only included the last year of the NI186 indicator, and again this only runs to 2011. I think the climate change committee target for 2020 could be included. The SA Objective 14 target could at a higher level than RSS 65% for PDL? For Objective 15 the UK national strategy target for recycling 50% by 2020 should be included.	The traffic growth target was derived from the West Yorkshire Local Transport Plan 2006-2011, future drafts of the baseline data will be required to gather other transport growth data that looks further ahead. Similarly, the CO2 data will be reviewed as at present this is in line with the Local Area Agreement (LAA). Any agreed targets within the SA will need to accord with other CO2 targets within national, regional, and local targets. Although there may be inconsistencies and conflicts between the current data and the timescales of the Core Strategy, it is just as important the correct indicators are established at this time. Further work on targets for developing on previously developed land (SA Objective 14) and Recycling targets (SA Objective 15) needs to be carried out.
33	Mr Colin Holm	Government Team (West) Natural England	Table 5	Further investigation required	SA Objective 4 'To ensure that cultural, leisure, and recreational activities are available to all' – in relation to the decision making criteria 'Will it provide access to the countryside or green space for recreation and enjoyment?' the targets should be informed by the findings of the Accessible Natural Greenspace Standard assessment carried out as part of the Calderdale Open Space, Sport and Recreational Study: Strategy and Action Plan (2006).	Your comments on the indicator concerned with access to the countryside or green space are noted - further analysis of the Calderdale Open Space, Sport and Recreational Study: Strategy and Action Plan (2006) will be carried out to develop targets.
34	Mr Colin Holm	Government Team (West) Natural England	Table 5	Agree - further action	SA Objective 10 'To protect and enhance biodiversity' – Natural England advises that the 'Targets' column should make reference to 'meeting the targets for habitat and species established in the Local Biodiversity Action Plan'. The	Your comments on the targets relating to SA Objective 10 - 'To protect and enhance biodiversity' - to have regard to the Local Biodiversity Action Plan have been noted and further work will be carried out to incorporate these in the SA. The indicator concerning Sites of Special Scientific Interest (SSSIs) will be amended to include the area, as

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					indicator 'Number of designated SSSI' should read "number and area of designated SSSI". The indicator 'Number of designated Sites of ecological or geological importance (SEGI)' should read "number and area of designated Sites of ecological or geological importance (SEGI)".	will the indicator for Sites of ecological or geological importance (SEGI), to include the area for these designations as well.
35	Mr Colin Holm	Government Team (West) Natural England	Table 5	Further investigation required	SA Objective 12 'To protect and enhance the natural, semi-natural and man- made landscape' – Natural England considers that an additional 'qualitative' indicator is required to monitor changes in the character of the natural, semi-natural and man-made landscape within the District. This indicator would need to be underpinned by a robust and detailed District-wide Landscape Character assessment study. The adopted approach should reflect the monitoring framework provided by the National Countryside Quality Counts initiative for monitoring landscape change.	Your comments concerning a qualitative indicator relating to SA Objective 12 'To protect and enhance the natural, semi-natural and man- made landscape' that would monitor changes in the character of the natural, semi-natural and man-made landscape within the District are noted. However, working up such an indicator would require a Landscape Character Assessment, an area of work that has not as yet been commissioned, and further work needs to be carried out as to establish whether or not some form of Landscape Character Assessment is required as part of the evidence base for the Core Strategy.
36	Mr Colin Holm	Government Team (West) Natural England	Table 5	Further investigation required	SA Objective 13: To ensure prudent and efficient use of natural resources and energy The Council may wish to consider expanding the proposed indicator related to 'Generation of electricity from renewable sources' to include reference to generation from onsite renewable sources related to major development schemes.	Your comments concerning the amendment to the indicator related to 'Generation of electricity from renewable sources' (SA Objective 13: To ensure prudent and efficient use of natural resources and energy), have been noted, and the Council will investigate expanding the indicator to establish the levels generated by different types of renewables and whether the generation is on or off site.
3	Mr Ian Smith	English Heritage	Appendix 1	Agree -	For completeness, this Section should	Appendix 1 will be updated to include reference to the

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				further action	also include reference to the European Landscape Directive	European Landscape Directive.
4	Mr Ian Smith	English Heritage	Appendix 1	Agree - further action	Implications for the SA - Paragraph 1.7 of PPG2 makes it clear that "the quality of the landscape is not relevant to the inclusion of land within a Green Belt". Green Belts do not seek to protect "quality landscapes".	The section will be amended to reflect the guidance in PPG2.
5	Mr Ian Smith	English Heritage	Appendix 1	Agree - further action	Minerals Plans This sections should refer to MPS1 not MPG1 which it replaces. The implications for the LDF will need to be reassessed. In the case of the historic environment. Annex 3 places a requirement of Development Plans to identify and safeguard potential sites for the supply of building and roofing stone.	MPS1 will be inserted and reference to MPG1 will be removed - similarly the implications for the LDF will be reassessed. Your comments on the requirement of development plans to identify and safeguard potential sites for the supply of building and roofing stone are noted and further work to present information on Minerals in future consultation drafts of the Core Strategy is required.
6	Mr Ian Smith	English Heritage	Appendix 1	Agree - further action	Regional Plans The Yorkshire Plan was issued by the Secretary of State in May 2008	Appendix 1 needs updating to insert the correct date for the Regional Spatial Strategy.
20	Toni Rios	Network Planning Manager Highways Agency	Appendix 1	Agree - further action	Appendix A needs to be updated to include Circular 02/2007, the Regional Network Report, and the Highway's Agency's Biodiversity Action Plan, in addition to the rail policies as set out in the Government's High Level Output Statement (HLOS), Network Rail Strategic Business Plan and Yorkshire and Humber Route Utilisation Strategy.	Appendix A will be updated to reflect the additional documents suggested.
7	Mr Ian Smith	English Heritage	Appendix 2	Further investigation required	A number of proposed Indicators under SA objective 7 would be more appropriately located within other of the SA objectives:- "Number of new developments incorporating sustainable	Your comments regarding moving indicators to other SA objectives are noted, as is the duplication of an indicator concerning Sustainable Urban Drainage Systems. Further work will be undertaken to amend the indicators as necessary.



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					drainage systems" would be better located within SA Objective 8 (which deals with flooding and actually already incorporates an Indicator relating to SUDS) "New developments reaching BREEAM very good rating" would be more appropriate within SA Objective 11 (which deals with reduction in the District's carbon footprint).	
21	Toni Rios	Network Planning Manager Highways Agency	Appendix 2	Agree - further action	Emerging data on accessibility and traffic generated by development will add to the evidence base	Any relevant up to date information on accessibility and traffic generated by development will be welcomed.
43	Mr Anthony Rae	Friends Of The Earth (Calderdale)	Appendix 2	Agree - further action	Under Objective 11 this should include the national data or targets derived from the Climate Change Act 2008;	The indicators and targets relating to SA Objective 11 will be updated to reflect the Climate Change Act 2008 where possible
37	Mr Colin Holm	Government Team (West) Natural England	Appendix 2	Agree - further action	SA Objective 4: To ensure that cultural, leisure and recreation activities are available to all We are pleased to see the provision of an indicator related to the achievement of accessible natural greenspace standards. The data source for completion of the relevant local/regional/national data, issues/constraints, and target columns of the table (where applicable) is provided by the Calderdale Open Space, Sport and Recreational Study: Strategy and Action Plan (2006). The 2008 State of the Natural Environment report produced by Natural England also provides environmental baseline data for	Your comments concerning the indicator on achieving accessible natural greenspace standards have been noted, and further analysis of the Calderdale Open Space, Sport and Recreational Study: Strategy and Action Plan (2006) relating to information on the local/regional/national data, issues/constraints, and targets will be carried out . The 2008 State of the Natural Environment report will be reviewed and the environmental baseline data used to inform the SA where relevant.

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					Yorkshire and the Humber.	
38	Mr Colin Holm	Government Team (West) Natural England	Appendix 2	Agree - further action	SA Objective 7: To retain, protect and create a quality locally distinctive built environment Data related to green Flag awards can be found on <a href="http://www.greenflagaward.org.uk">http://www.greenflagaward.org.uk</a>	The information relating to the green flag awards will be reviewed and the relevant data be used to inform the SA.
39	Mr Colin Holm	Government Team (West) Natural England	Appendix 2	Further investigation required	Natural England wish the following to be addressed against SA Objective 10: To protect and enhance biodiversity: Number of designated SSSI should read "number and area of designated SSSI". - Number of designated Sites of ecological or geological importance (SEGI) should read "number and area of designated - Sites of ecological or geological importance (SEGI)". The above amendments would facilitate the monitoring of this objective against the 'Change in areas of biodiversity importance' indicator. Data related to change in areas of biodiversity importance and the condition of SEGI should be sourced from West Yorkshire Ecology. If existing data is not available a desktop study/survey work may be required for effective application of the relevant indicators.	The first two points concerning indicators relating to SSSIs and SEGI have been noted and the indicators amended accordingly (see comment ID sa_cs34). Information relating to the indicator on the change in areas of biodiversity importance will be sourced from West Yorkshire Ecology.
40	Mr Colin Holm	Government Team (West) Natural England	Appendix 2	Further investigation required	(This is the same comment as made against sa_cs 35) Natural England considers that an additional 'qualitative' indicator against SA Objective 12 (To protect and enhance the natural, semi-natural and man made landscape) is	Your comments concerning a qualitative indicator relating to SA Objective 12 'To protect and enhance the natural, semi-natural and man- made landscape' that would monitor changes in the character of the natural, semi-natural and man-made landscape within the District are noted. However, working up such an indicator would

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					required to monitor changes in the character of the natural, semi-natural and man made landscape within the District. This indicator would need to be underpinned by a robust and detailed District-wide Landscape Character assessment study. The adopted approach should reflect the monitoring framework provided by the National Countryside Quality Counts initiative for monitoring landscape change.	require a Landscape Character Assessment, an area of work that has not as yet been commissioned, and further work needs to be carried out as to establish whether or not some form of Landscape Character Assessment is required as part of the evidence base for the Core Strategy.
41	Mr Colin Holm	Government Team (West) Natural England	Appendix 2	Further investigation required	(This is the same comment made against sa_cs36) SA Objective 13: To ensure prudent and efficient use of natural resources and energy The Council may wish to consider expanding the proposed indicator related to 'Generation of electricity from renewable sources' to include reference to generation from onsite renewable sources related to major development schemes.	Your comments concerning the amendment to the indicator related to 'Generation of electricity from renewable sources' (SA Objective 13: To ensure prudent and efficient use of natural resources and energy), have been noted, and the Council will investigate expanding the indicator to establish the levels generated by different types of renewables and whether the generation is on or off site.

**Table 3 – Sustainability Appraisal Scoping Report Comments Received - Noted**

Resp No.	Full Name	Organisation Details	Section/ Para/Table	Response Categories	Summary of Comments	Council Response
12	Mr D R Witcher	Shibden Valley Society		Noted	The society fully supports the principles of sustainable development set out in the Bruntland Report and subsequent legislation. It wholeheartedly welcomes	Your comments are noted

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					the preparation of a Sustainability Appraisal as a basis for the L.D.F. and believes that the aims of such an appraisal fully accord with the aims of the Society.	
23	Mr Roger Drayton			Noted	Hope the SA process can help the LDF have a positive outcome. If the goals outlined in 1.10 can be met than the LDF will have achieved a worthwhile result. These goals are: Living within environmental limits; * Ensuring a strong, healthy and just society; * Achieving a sustainable economy; * Promoting good governance; and * Using sound science responsibly.	Your comments are noted, the SA will need to ensure sustainable development is at the centre of the Core Strategy.
13	Mr D R Witcher	Shibden Valley Society	2.17	Noted	The Society accepts this list as comprehensive and wishes to highlight the importance of two issues: Protection and enhancement of the landscape character of the countryside. Promotion and improvement of access to the countryside around the urban fringe, towns and villages for walking, cycling and horse riding	Your comments concerning the summary of the main issues arising from Appendix 1 are noted.
1	Mr Ian Sanderson	Principal Archaeologist West Yorkshire Archaeology Advisory Service	4.2	Noted	We welcome and agree with section 4.2 where Environmental Issues identified include the need to protect the identity and distinctiveness of villages and towns and to conserve the district's features of historic significance.	Your comments concerning the need to protect the identity and distinctiveness of villages and towns and to conserve the district's features of historic significance are noted.
32	Mr Colin Holm	Government Team (West) Natural England	Table 4	Noted	Natural England is content with the final list of proposed sustainability objectives set out in Table 4.	Your comments agreeing with the final list of proposed sustainability objectives are noted.

Resp No.	Full Name	Organisation Details	Section/ Para/Table	Response Categories	Summary of Comments	Council Response
22	Toni Rios	Network Planning Manager Highways Agency	Appendix 3	Noted	Key sustainability issues: No comments additional to those made in relation to Tasks A3 and A4.	Noted.

#### 4. Next Steps

4.1 The next step for the Sustainability Appraisal will be to consider the comments received, and finalise the Sustainability Appraisal Framework. Once the agreed Sustainability Appraisal Framework is in place, it will be used to inform the preparation of all Local Development Framework (LDF) documents