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Our Ref: Planning Conformity\030 - Wakefield\Local Development Frameworks\Final Responses

27 February 2008

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Dear Richard

Wakefield MDC Core Strategy and Development Policies Submission Document

Further to your letter of 17 January 2008, I am pleased to confirm the Assembly's opinion that the Wakefield Metropolitan District Core Strategy and Development Policies Development Plan Documents, as submitted to the Secretary of State, are in general conformity with the existing and draft Regional Spatial Strategy and the Secretary of State's Proposed Changes to the Regional Spatial Strategy (RSS).

Status of RSS

Paragraph 4.19 of PPS12 (Local Development Frameworks) makes it clear that an RSS under preparation gathers more weight as it passes through its preparation process. It states "Where the regional spatial strategy has been through an Examination in Public, and the Proposed Changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State". The Assembly has therefore referred to the Proposed Changes to the Draft RSS (published at the end of September 2007) in this response but would like to make it clear that the Assembly will be commenting on the Proposed Changes.

Need for General Conformity

The RSS has an important role in providing a strategic policy context for local policies. The Assembly is keen that local authorities highlight the need for there to be 'general conformity' between the RSS and DPDs, to ensure that the two strands of the development plan are mutually supportive. The introduction and chapter 4 of the Core Strategy submission DPD and chapter 2 of the Development Policies DPD deal with this and are welcomed by the Assembly. We also welcome references to the RSS throughout, in association with each Core Policy and Development Policy.

Spatial Development Strategy - The Role and Function of Place

The Assembly's response to the Core Strategy Preferred Options welcomed the establishment of a settlement hierarchy but questioned whether the identification of a large number of settlements - over and above those that were identified in the Regional Settlement Study (2004) - was in alignment with the emerging RSS.

The Assembly welcomes the further evidence that has been provided to clarify this issue and considers that the reasons given in paragraph 5.18 of the Core Strategy, which set out distinct local circumstances in Wakefield MDC, help to justify in principle the authority's approach to its relatively large number of settlements within its hierarchy. Proposed Changes to Policy YH6 on Principal Towns gave Local Authorities the flexibility to identify settlements in addition to those identified in the Settlement Study. This aspect of the Core Strategy is now in line with Policies YH5 and YH6.

Meeting Local Needs in Sustainable Locations

At Preferred Options stage concern was expressed about the status of Wakefield and whether its role as a sub-regional city was sufficiently distinct from other settlements in the settlement hierarchy. The Assembly is of the opinion that this issue has not yet been fully resolved and wishes to raise concerns that Policy CS1 has the potential to give rise to a continued dispersal of development across the Metropolitan District that would not fully align with RSS policies and would not help to meet sustainable development objectives.

Together Policies YH5, YH6, YH7 and YH8 of Proposed Changes to Draft RSS (2007), seek to focus the majority of new development on the Sub Regional Cities; followed by the Principal Towns and finally the Local Service Centres. To that end, the Assembly welcomes the recognition, in criterion 'a' of Policy CS1, that the 'largest' amount of housing, employment, retail and mixed-use development will take place in Wakefield, the Sub Regional City.

However, the Assembly is concerned at the lack of detail on the implementation of Policy CS1 and considers that the policy and its reasoned justification should provide more evidence in support of the term 'largest'. While Policy CS2 seeks to

clarify what 'largest' means in terms of housing provision, i.e. the greatest proportion of development compared with other settlements, little detail is given for other forms of development.

Specifically, the Assembly is concerned that criterion 'b' of Policy CS1 has the potential to contradict criterion 'a'. Criterion 'b' notes that new development will be located within Wakefield city centre and other town centres, taking advantage of existing services and high levels of accessibility. Chapter 11 on Delivery and Monitoring fails to provide clarification on how Policy CS1 will seek to ensure that the largest amount of development will be located in Wakefield over time. To that end, the Assembly is concerned that the current approach has the potential to give rise to a continued dispersal of development across the Metropolitan District that would not help to meet sustainable development objectives.

The Assembly recognises the intention of the local authority to provide further evidence on the capacity of settlements to accommodate development through future site allocation DPDs. However, the Assembly would welcome a stronger reflection of a "Wakefield first" approach in Policy CS1 in general for all development. Policy CS1 will underpin subsequent DPDs and other policies in the Core Strategy.

The Assembly believes that this concern could be overcome through a greater reflection of the potential Wakefield has as a Sub-Regional City. This may be broadly reflected in the Core Strategy by providing more evidence on the potential future role of the sub-regional city and potential broad locations of development linked with the capacity of Wakefield compared to the other settlements in the hierarchy. While the Key Diagram does note the location of key development sites in Wakefield there are as many in Castleford, which may lead to confusion as to the roles of both settlements.

The Scale and Distribution of Additional Housing

The Assembly welcomes and supports the broad split in housing delivery between settlements. This is in line with Policies YH5 and YH6. However, subsequent to comments above on Policy CS1, we would welcome more evidence as to the mechanisms by which the housing split between the larger settlements is to be delivered. The Assembly acknowledges that a future site allocations DPD will provide more detail on this, but would have expected the Core Strategy to reflect the priorities for Wakefield, Castleford and Pontefract and the intended approach of the local authority to meet local needs throughout the plan period.

This evidence will be especially important as the Region meets the challenge of a step-up in housing growth as set out in Proposed Changes to RSS (2007). In relation to the house-building requirements in the Plan not only are the overall levels higher in the Proposed Changes, but the 'step up' in building rates would take effect immediately (from 2008) and not 2011 or 2016 as suggested in Draft RSS (2004).

The proposed higher rates also last until 2026 not just to 2021. The sharpest increases in proposed rates of house-building in the region include those for Wakefield. It should be noted that the Assembly has made representations to the Secretary of State on these Proposed Changes which request a 2011 rather than 2008 step-up to the higher housing requirements – as being a more realistic and deliverable approach and propose a new policy on 'Managing and Stepping Up the Supply and Delivery of Housing' to address key regional concerns.

The Assembly is keen to ensure that Wakefield MDC identifies and manages the release of land to maintain the momentum of the urban transformation of the Sub-Regional Cities and Principal Towns.

As it stands Table 4 suggests that there is no need to strategically phase the delivery of housing between settlements throughout the plan period. The Assembly is of the opinion that strategic messages on the particular needs of Wakefield, Castleford and Pontefract (including links to potential future investment) will enable decisions about where, and importantly, when development is located so as to underpin the role of Wakefield as the prime focus for development in line with Policy YH5 of the RSS and to maintain the momentum of Wakefield's urban transformation.

Creating Mixed and Balanced Communities

The Assembly welcomes Policy CS7 and the criteria used to support locations for Gypsy, Travellers and Travelling Showpeople. The Proposed Changes to RSS set a requirement for additional provision to meet the housing needs of Gypsies and Travellers to address an overall shortfall of at least 255 pitches across the region alongside a West Yorkshire target. It would be useful if the scale of the problem and potential need for sites in Wakefield so as to help meet this sub-regional shortfall were reflected in the Core Strategy policy. The Core Strategy should also make reference to the West Yorkshire Gypsy and Traveller Accommodation Needs Assessment (due to be completed April 2008) and make a commitment to address messages arising from this work.

Supporting a Dynamic & Efficient Local Economy

The Assembly welcomes the intention to locate office development in the sub-regional city and principal town centres. However, the Assembly repeats its concerns in relation to Policy CS1 above, that without a robust sequential approach there is a danger that office development will be dispersed throughout the settlement hierarchy and in office parks as opposed to the largest amount being located in Wakefield.

In Policy CS8 (2a) there is no distinction made between Wakefield, Castleford, Pontefract and existing office parks as potentially appropriate locations for office development. The Assembly considers that some reflection of the remaining

capacity of existing office parks compared to likely future demands is needed so as to identify the likely potential amount of future office development which will be directed towards town centres.

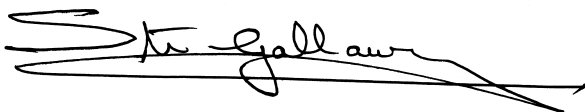
Creating High Quality, Distinctive and Safe Environments

Proposed Changes to Draft RSS Policy ENV5 sets an indicative renewable energy generation target for Wakefield of 11MW to 2010 and 41MW to 2021. The Assembly welcomes and supports that these targets are reflected in Policy CS13. The Assembly also supports Policy D39 in the Development Policies Submission DPD which refers to the need to ensure that 10% of energy to be used in sizeable developments comes from on-site renewable sources. This is in line with draft RSS Policy ENV5. It should be noted that the Proposed Changes removes the 10% target from the RSS but requires Development Plan Documents to set an appropriate local target for on-site renewable energy generation of at least 10%. To that end, the Assembly particularly supports the approach in Policy D39 that from 2011 until the end of 2015 the requirement will be at least 15% rising to at least 20% thereafter.

At this stage, the Assembly would be happy for the points made here to be dealt with by written representations at the Examination of the North York Moors Core Strategy and Development Policies DPD. We are happy to have discussions with you if this would help to clarify any issues prior to the Examination of the Core Strategy DPD.

If you have any queries about these points, please do not hesitate to contact Martin Elliot on 01924 331 294.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Stephen Galloway', with a long horizontal flourish extending to the right.

Cllr. Stephen Galloway
Chair, Regional Planning Board