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Our ref:\Planning Conformity\030- Wakefield\Local Development Frameworks\Final Responses\April 08 - March 09

14 August 2008

Peter Gooding  
Planning Services  
Wakefield MDC

Sent By E-Mail

Dear Peter

**Wakefield Local Development Framework – Site Specific Proposals  
Development Plan Document Preferred Options Consultation**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Wakefield Local Development Framework – Site Specific Proposals Development Plan Document Preferred Options for Wakefield Metropolitan District Council and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise.

The following officer comments are made in relation to The Yorkshire and Humber Plan (The Regional Spatial Strategy to 2026) published in May 2008.

Government guidance (paragraph 4.33 in PPS12) states that in devising its strategy, the local planning authority should be consistent with national policy and in general conformity with the regional spatial strategy. When the Site Specific Proposals DPD is published a formal Assembly view on its general conformity with the Yorkshire and Humber Plan will need to be given.

The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving

the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

## **Key Points on the DPD: Preferred Options**

Overall, we welcome and support the consultation papers and the options within them. We particularly welcome references to RSS and the setting of policy issues in a regional context.

We do however have two main concerns. The first relates to the delivery of housing throughout the plan period. The second relates to provision for Gypsies and Travellers.

We welcome the focus of housing development in Wakefield Sub-Regional City (with 34% of the total gross additional dwellings 2004-2021). As compared to Castleford (26%) and Pontefract (17%) the sub-regional city does not deliver as much housing as RSS Policy YH4 might have anticipated. However, the Assembly has confirmed through its statement of general conformity on the Wakefield Core Strategy, that there are reasons for delivering higher rates of growth than would otherwise be expected in Castleford, Pontefract and the Five Towns.

Notwithstanding this, you are encouraged to ensure that the Wakefield Sub-Regional City be the prime focus for housing in line with the urban transformation objectives of Policy YH4 throughout the plan period. To that end, the Assembly wishes to raise an issue that the housing trajectory reveals potential for an imbalance between Wakefield and Castleford from 2015 onwards as development in Wakefield tails off but delivery in Castleford picks up. This could potentially mean that Castleford becomes the prime focus for development for a significant part of the plan period. We recommend that you demonstrate, perhaps through reference to Core Strategy policy aims for the latter plan period or additional sites within your SHLAA, that Wakefield sub-regional city will maintain its prime role within the authority.

We also wish to raise an issue around the delivery of sites for Gypsies, Travellers and Travelling Showpeople. National Guidance in Circulars 1/06 and 04/07 makes clear that Gypsies and Travellers and Travelling Showpeople's accommodation needs is an important part of the assessment of general accommodation needs.

RSS policy H6<sup>1</sup> notes that there is a regional and sub-regional shortfall of pitches and that significant numbers of new pitches are required to address the needs of Gypsies and Travellers. It also states that Local Authorities should carry out an assessment of the housing needs of Gypsies and Travellers by July 2008, and that LDFs should ensure that there is adequate provision for Gypsies and Travellers.

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<sup>1</sup> Please note that Policy H6 refers to Gypsies and Travellers, which includes the Travelling Showpeople community.

These needs should be assessed as part of Gypsy and Traveller Accommodation Assessments (GTAAs). The data collected through the GTAA process will inform the preparation of Development Plan Documents. It is our understanding that work on the West Yorkshire GTAA is well advanced. To that end, we would have expected the needs of Gypsies, Travellers and Travelling Showpeople to have been addressed at the same time and in the same DPD as the settled community.

I trust that the comments provided here are helpful to you as you prepare the site Specific Proposals Development Plan Document. Clearly we wish to see the DPD developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here further if it would help this process.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your DPD.

Regards

Martín - EList

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