

Development Plan Conformity: – informal comments by the Regional Assembly.

Wakefield LDF Issues report

Strategy

Qu 1 Spatial development strategy principles

Support the principles set out. However for the sequence set out in bullet point 6 to properly reflect current RSS Policy P1 it should refer to nodes in transport corridors not simply sites in transport corridors. Note: the principles set out in P1 may change in new RSS

Qu 2 Settlement classification

It is helpful to develop a classification including defining the urban areas along the lines set out in the box above question 2 in the document. The submission version of new RSS due in late spring 2005 should help you refine this classification.

Housing

Qu 3 Housing provision at 950 du/yr

The assembly has to reserve its position on this point as it has not yet come to a view on the distribution of housing provision in new RSS

Qu 4 higher levels of house building to support regeneration

This matter needs careful consideration, there are clearly regeneration benefits to be gained from properly directed higher levels of house building. However this must be balanced with the need to support weak housing markets by avoiding over provision of new housing in such areas.

Qu 5 distribution of new housing

The distribution narrative does not appear out of line with current RSS. This matter should be reconsidered once the strategy in new RSS become more clear

Qu6 Sequential approach

This appears ok subject to the point made in question 1 about development in transport corridors

Qu 7 Greenfield windfalls

Current RSS does not explicitly address this matter. New RSS will need to carefully consider whether there is a case to depart from national guidance which strongly discourages greenfield windfalls. At this point in time and with the information available it is unlikely that new RSS will depart from the national position.

Qu 8 Brownfield target

New RSS will be re-examining brownfield targets at present the current RSS target of 61% should remain

Qu 9 managed release of housing sites

RSS supports the managed release of land for housing. The time period proposed for new housing of 2004 to 2017 appears arbitrary and consideration should be given to a strategy period which 'matches' with new RSS (i.e. to 2021)

Qu10 Intensification which is out of character

This is a matter for local consideration which is unlikely to raise regional issues

Qu11 Minimum density

New RSS will be reconsidering density issues including the average density of 38 du/ha referred to in paragraph 6.27. At this point it does not seem unreasonable to expect a local authority with the settlement characteristics of Wakefield district to achieve the regional average.

Qu12 Affordable Housing

Any new target for affordable housing will need be based on evidence of housing need and the draft of the new Regional Housing Strategy due to be published at the end of February may be of help in this.

Qu13 improvements to existing stock

See comments on question 4 regarding the risks arising from over provision of new housing in areas with weak markets.

Economy

Qu 15 scale of allocations

The regional calculations about the sectoral trajectory of the regional economy - the "bigger" picture found in the current consultation documents on RSS should be of use in addressing these issues.

The section could benefit from an increased emphasis on the sub regional and regional dimension. For example, it could stress that calculations about the overall size and mix of the strategic site portfolio will need to relate to the sub regional strategies.

Qu 16 Approach to new employment sites

The paper usefully mentions the extant regional dimension. The development work behind current economic topic paper should help progress policy development. The research which underpins the RSS Topic Paper can be viewed on our web site

Qu 17 alternative uses

Yes if they are in suitable locations for alternative uses the revisions to PPG3 published in January are useful

Mixed use development

Qu 20 promoting mixed use development

RSS supports the promotion of mixed use development in city and town centres

Qu21 Special policy areas

The approach taken in special policy areas should not undermine the overall strategy in RSS or the LDF

Transport

Qu 22 approach to accessibility criteria

The approach taken on accessibility which draws on the work undertaken for current RSS is supported

Qu 23 developer contributions to transport improvements

RSS does not specifically address this point

Qu 24 travel plans

RSS does not specifically address this point

Qu 25 car park provision

The approach to car parking provision reflects policy in RSS and is supported

Qu 26 park and ride schemes

Site specific proposals are not a matter which is addressed in RSS, no comments

Green Belt

Qu 27 Exceptional circumstances

Current RSS gives discretion to local authorities to look at local changes to the green belt provided proposals meet that test they would be supported. New RSS is looking again at this matter.

Qu28 changes to PAS designations

RSS policy P2 allows for local reviews of the green belt to consider adding land to the green belt. Since that section of RSS was drafted the courts have set a very stringent test (Copas v The Royal Borough of Windsor and Maidenhead ([2001] J.P.L. 1169) has led to a very specific test to be applied when adding land the green belt. This test requires that 'some fundamental assumption which caused the land initially to be excluded from the Green Belt

is there after clearly and permanently falsified by a later event') This test will need to be born in mind when making proposals

DC policies

Mineral Extraction

Qu 32 & 33

The approach to mineral extraction you set out is in accordance with RSS. In future RSS will be developing an approach to assessing the potential for mineral extraction based on Strategic Environmental Assessment principles.

Waste

Qu 34 and 35

The assembly is generally supportive of the waste section and how it addresses regional integration. However, the paper was obviously prepared pre the release of draft PPS10 in Dec 2004. Messages from ODPM in PPS10 alter the regional and local approach to the development of waste strategy. Significantly, the requirement to carry out BPEO assessments to "justify" strategic choices has been dropped. We are currently developing guidance via the Regional Waste Steering Group and the Regional Technical Advisory Body. In summary, the RSS will set out tonnages of waste (by waste stream) that need to be managed by WPA or sub region. Messages will be given as to the likely tonnages of waste required to be handled under different tiers of the waste hierarchy - i.e. the amount to be recycled, have value derived from or finally disposed of. It will then be for the LDFs to make arrangements (via site allocations and a supportive policy framework) to see an appropriate mix of facilities delivered on the ground.

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