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Our ref: AJ/RH/Bradford B1, B2, B8 Employment Park, Rooley Lane, Bradford – Oct 07

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Mohammed Yousuf  
Department of Regeneration  
Development Services  
Bradford Metropolitan District Council  
3<sup>rd</sup> Floor Jacobs Well  
Bradford  
BD1 5RW

Dear Mohammed

**Planning Application Number: 07/08687/FUL**

**Development of the site as a strategic employment park (use classes B1/B2/B8) with associated offices, gatehouses, car parking, highway infrastructure and landscaping. The application comprises 1) Full details on 22 hectares of the site with no matters reserved; and 2) Outline details on 22 hectares of the site with means of access and site re-profiling included for full approval and layout. Scale, appearance and landscaping reserved**

Thank you for consulting the Assembly on the above. We understand that this application is similar in nature to application reference: 07/05860/OUT but with no residential development proposed. Our comments are therefore similar to those submitted on application reference: 07/05860/OUT but they also refer to the Secretary of State's Proposed Changes to draft RSS (2007) that were published at the end of September. I am pleased to forward the following officer comments to you, based on the current and draft RSS.

The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken

under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

Please note that the Secretary of State's Proposed Changes to Draft RSS have now been published (September 2007). Government guidance (paragraph 4.19 in PPS12) 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".

Assembly responses to consultations on strategic applications will therefore have to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that 'considerable weight' will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs and application Inquiries. At the same time, it should be noted that the Assembly itself will be making comments on the Proposed Changes and that the final version of the new RSS is expected early in 2008.

Both the existing and draft Regional Spatial Strategies aim 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 (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

### *Regional Policy Context*

Policies in the current RSS (December 2004) seek to focus development on the region's town and city centres, reduce the need to travel, ensure that development is accessible by a range of transport modes and support the renaissance and regeneration of the region's urban centres by promoting high quality developments that reflect the scale and character of the centres to which they relate (see, for example, policies P1, S4, E1, SOC3, T1, T2).

Policies in draft RSS (December 2005) build on these principles. The Core Approach (Policies YH1 – YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional and Sub-Regional Centres (of which Bradford is one) and that away from these sufficient development should be

permitted in Principal Service Centres to enable them to fulfil their role as service centres (Policy YH8 building on policies YH5, YH6 and YH7 and Policies E2 and T1).

It should be noted that Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with "Principal Towns". The Core Approach of draft RSS is not changed by the Proposed Changes.

This response uses the terminology of the Proposed Changes to draft RSS.

#### *Location of development*

Bradford is identified as a Sub Regional City in the Proposed Changes to draft RSS (2005). Policy YH5A provides for Regional Cities and Sub Regional Cities to be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the Region. Policy YH8A specifically states that the majority of new development should be concentrated within Regional and Sub Regional Cities, with sufficient development in both Principal Towns and Local Services Centres to fulfil their respective service roles.

Policy YH5B also provides for Regional and Sub Regional Cities to strengthen the identity and roles of city/town centres as accessible and vibrant focal points for high trip generating uses. Policy LCR1 of draft RSS (2005) provides for Bradford to capitalise on the strength and Sub Regional Service Centre role with its significant scale and proximity to Leeds. The Secretary of State's Proposed Changes to draft RSS (2007) recommends Bradford should be transformed into a location for increased growth in jobs and homes through the renaissance of the city centre, and development and regeneration elsewhere.

The proposed development is located approximately 3km to the south of the city centre of Bradford. Policies P1 and E4 of current RSS and YH8 of draft RSS provide for an urban-focussed, transport-orientated approach to development. Policies P1 (b) and E4 (a) of current RSS state that, wherever possible, in considering development proposals preference should be given to land within urban areas.

Policy P1 in current RSS (2004) requires a sequential approach to site selection. YH8B of draft RSS (2005) also makes it clear that a sequential approach should be taken in determining applications to ensure that developments are either reusing land or buildings within centres, infilling sites within centres or are sites that are well connected on public transport routes and that can maximise accessibility by public transport, walking and cycling. Policy YH8C requires a transport-orientated approach to ensure that development makes the best use of transport infrastructure, is focussed along existing or planned public transport corridors and maximises accessibility by public transport, walking and cycling. It is not clear that a sequential approach to alternative site selection has been carried out.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) recommends changes in the terminology and phrases of Policy YH8. These

do not alter the Core Approach or change the site selection/accessibility orientated approach set out above.

### *Uses*

The proposed development consists of industrial and warehouse use class B1, B2 and B8 with ancillary offices. The applicant states that it is envisaged that Zone A will be developed for 'Advanced Business and Enterprise Units' within Use Class B1 (excluding pure offices) with some small B8 storage. Policy E1 in draft RSS (2005) states that all plans, strategies, major decisions and programmes in the Region will aim to support the development of a more entrepreneurial region with aim of achieving higher rates of business start-ups and survival, and a larger number of small businesses, including the provision of low cost and smaller incubator units for small and medium-sized enterprises and micro businesses.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) does not alter the policy context of Policy E1.

Policy E4 of current RSS (2004) states that "offices should be located in town and city centres" and Policy E2 of draft RSS (2005) reinforces these principles by stating, "city and town centres will be the main focus for office...and other uses which generate a high level of people movements" (for example B1 uses). These uses should not be located outside these centres if they would undermine the delivery of the Plan's Core Approach (YH1-YH8)". Policy E3 of draft RSS (2005) further reinforces that office use should mainly be located in or adjacent to town or city centres. The Assembly would not have concerns if the B1 office use is ancillary to the development.

Policy E4 of current RSS (2004) states that provision for warehousing and distribution "should be made for activities with high goods volume and low labour content close to major inter-regional road/rail/water transport nodes, ports and airports, integrated wherever possible with freight access and transport improvements." The proposed development is located adjacently to the M606.

It should be noted that Secretary of State's Proposed Changes to draft RSS (2007) recommends changes to Policy E4 of draft RSS (2005) to provide for plans, strategies, investment decisions and programmes to support key sectors including Financial and Business Services; Tourism; Logistics; and Construction, and regional priority clusters including Advanced Engineering and Metals; Chemicals; Bio-Science; Digital; Food and Drink; Healthcare Technologies; and Environmental Technologies.

### *Energy*

The sustainable use of resources is a key theme of both current and draft RSS. Policy P6 of current RSS encourages new development to maximise energy efficiency and minimise resource demand. Policy ENV5 of draft RSS (December 2005) requires at least 10% of energy to be used in sizeable new development is to come from on-site renewable energy sources.

It should be note that the Secretary of State's Proposed Changes to draft RSS (2007) recommends that local authorities should set their own proportions of the amount of energy to come from local renewable sources.

### *Accessibility*

Ensuring the accessibility of development by non-car modes is a key principle of regional planning policy. The proposal is a high-trip generating development and it is essential that access by non-car modes to the site is a reality. Accessibility criteria are set out in both the current and draft RSS (Table 7.1 and 7.2 of current RSS and Table 16.8 and 16.9 of draft RSS). These tables include acceptable walking and overall journey times for the population that would be travelling to the site. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

It is not clear from the application whether or not an assessment against the accessibility criteria has been carried out.

### *Conclusion*

In conclusion to the comments made the Assembly would support the development as it is within the urban area of Bradford and will support its role as a Sub Regional City, but on the basis that:

- The B1 office use is ancillary to the development
- A sequential approach has been followed
- A proportion of the energy to be used in the development is to come from on-site renewable energy sources (bearing in mind the 10% figure referred to in Proposed Changes to draft RSS).
- There is adequate public transport provision and provision for walking and cycling to meet the accessibility criteria of current and draft RSS

If you have any queries about this response, please do not hesitate to contact me.

Yours sincerely



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