YORKSHIRE AND HUMBER ASSEMBLY
The Regional Strategic Partnership

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Dear Mohammed

Application reference: 07/05860/OUT

Industrial and warehouse development use class B1, B2 and B8 with ancillary offices, gatehouses, car parking, landscaping, roads and footways and residential development at West Bowling Golf Club 246 Rooley Lane Bradford West Yorkshire BD5 8LB.

Thank you for consulting the Assembly on the above. 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.

The Panel Report of the Examination in Public of the Yorkshire and Humber Plan has now been published (May 2007). This contains recommendations to Government that may or may not be reflected in the Proposed Changes to the Plan that are due to be published for consultation in the summer. The Panel Report backs the Plan's overall approach and strategy. It also includes recommendations for changes or additions to policies. Any points from the Panel Report that are particularly relevant to the Assembly's comments on this application are noted in this response. The Yorkshire and Humber Plan should be published in early 2008.

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). The Panel Report (May 2007) does not challenge this Core Approach.

Location of development

Bradford is identified as a Sub Regional Centre in the draft RSS (2005). Policy YH5A provides for Regional Centres and Sub Regional Centres 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 Centres, with sufficient development in both Principal and Local Services Centres to fulfil their respective service roles.

Policy YH5B also provides for Regional and Sub Regional Centres to strengthen the identity and roles of city/town centres as accessible and vibrant focal points for high trip generating uses. Policy LCR1 provides for Bradford to capitalise on the strength and Sub Regional Service Centre role with its significant scale and proximity to Leeds.

The proposed development is located approximately 3km to the south of the town 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. The Panel Report (May 2007) supports this sequential approach. It is not clear that a sequential approach to alternative site selection has been carried out.

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.

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.

Housing

The proposal consists of 145 residential units; therefore housing mix will need to be a key consideration in this development. Existing RSS encourages local authorities to set targets for the provision of affordable housing based on housing needs assessments (Policy H4). Draft RSS identifies Bradford as an area of 'low need' for affordable housing (based on the Regional Housing Strategy, 2005). Policy H3A of the draft RSS suggests that in areas of 'low need' (including Bradford) up to 29% of homes (on sites of 15 homes or more) needs to be affordable. Given this context, the local authority is encouraged to consider what would be the appropriate mix of housing in this development.

It should be noted that the Panel Report (May 2007) recommends changes to Policy H3 (see pages 81 – 85 and recommendations 5.10 and 5.11).

Current RSS (December 2004) sets an average annual net completion rate of 1390 dwellings for Bradford between 1998-2016. Draft RSS (December 2005) sets an average annual net completion rate of 1560 dwellings for Bradford between 2004 – 2011, 1920 dwellings between 2011 – 2016 and 2180 dwellings between 2016 – 2021. The Panel Report (May 2007) makes the recommendation that the average net completions rate for Bradford should be 1560 dwellings per annum between 2004-2011 and 10300 dwellings per annum between 2011-2016 and 2016-2021.

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 maximize energy efficiency and minimise resource demand. Policies in draft RSS build on this and, given the scale of the proposed development, we would expect that at least 10% of the energy to be used would come from on-site renewable energy sources, in line with policy ENV5 of draft RSS. The Panel Report recommends that this policy should be applied to developments of 10 houses or more.

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 Panel Report (March 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.

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 but on the basis that:

- the B1 office use is ancillary to the development
- a sequential approach has been followed
- an appropriate mix of housing, including affordable is secured on the site
- at least 10% of the energy to be used in the development is to come from on-site renewable energy sources.
- 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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