

Martin Elliot  
Planning Policy Manager  
01924 331 594  
martin.elliott@yhassembly.gov.uk

Our ref: RH/Bradford Mixed Use Scheme, George Street, Bradford Dec 07

21 December 2007

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

Dear Stewart

**Planning Application Number: 07/10203/OUT**

**Redevelopment of the Yorkshire Water depot for a mixed-use scheme comprising offices (B1), residential (C3), Hotel (C1) and small-scale commercial uses (A1, A2, A3, A4, B1 and D1). Yorkshire Water George Street Bradford West Yorkshire BD1 5QS.**

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.

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 within the Sub Regional Centre and on previously developed land so it is therefore supported in principle. 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 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*

Much of the nature of the proposed development (B1 office floorspace, hotel and small-scale commercial uses) is made up of uses that the RSS seeks to promote within city and town centres (policies P1 and E1 of existing RSS and policies YH5, and E2 of draft RSS). 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).

Therefore the Assembly would support these uses in principle.

### *Housing*

The proposal consists of 400 dwellings. Housing mix will need to be a key consideration in this development. Current RSS (2004) encourages local authorities to set targets for the provision of affordable housing based on housing need 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 draft RSS suggests that in areas of 'low need' (including Bradford) less than 29% of homes (on sites of 15 homes or more) need to be affordable. The Secretary of State's Proposed Changes to draft RSS Policy H3 recommends that up to 30% of new housing in Bradford needs to be affordable. Policy H4 in draft RSS (December 2005) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities. The Secretary of State's Proposed Changes to draft RSS (2007) recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including family homes, to create sustainable communities.

Given this context, the local authority would be encouraged to consider and support with appropriate evidence what would be the appropriate mix of housing in this development if it were minded to approve the application prior to the Reserved Matters stage. We understand from the work we have commissioned across the region on Strategic Housing Market Assessment that Bradford is soon to conclude work on its own Housing Market Assessment and this should provide evidence to support appropriate mix.

### *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.

While it may be assumed that the criteria are met given the development's city centre location it is not clear from the application whether or not an assessment against the accessibility criteria has been carried out.

### *Parking Standards*

Policy T2 of the draft RSS states that maximum parking standards for new developments must be in line with Table 16.5. The local authority will need to ensure that the development is in accordance with Policy T2 of draft RSS (2005).

### *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. Proposed Changes to Draft RSS (2007) removes this threshold, instead noting that greater use of local renewable energy in new development should be promoted and secured. Bradford City Council should ensure that renewable energy is promoted and secured in the proposed development.

### *Conclusion*

In conclusion to the comments made the Assembly would support the development in principle 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 housing mix should reflect a local needs assessment and the need for an appropriate housing mix.
- Parking standards should be in line with current and draft RSS.
- 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).

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

Yours sincerely

*Mart - Elliot*

Martin Elliot  
Planning Policy Manager