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Andrew Marshall  
Group Planning Manager  
Bradford Metropolitan District Council  
Department of Regeneration  
Local Development Framework Group  
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Bradford  
BD1 5RW

Dear Andrew

**The Local Development Framework for Bradford District  
Bradford City Centre Area Action Plan Issues and Options Consultation  
(Regulation 25)**

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the City Centre Area Action Plan: Issues and Options document for Bradford 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. When the City Centre Area Action Plan is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004), the Draft Regional Spatial Strategy – the

Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005) and the Secretary of State's Proposed Changes to the Yorkshire and Humber Plan (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".

As the Proposed Changes are now published, Assembly responses to consultations on DPDs need 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. At the same time, it will be important to note 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).

### **Key Points on the City Centre Area Action Plan: Issues and Options**

Below is a summary of the main points the Assembly wishes to raise with regards to the City Centre Area Action Plan: Issues and Options. **Annex A** provides further detail for each of these issues.

- Welcome the references at the start of the document to draft RSS (2005).
- Support the two strategic options; the '*Established Option*' and the '*Emerging Option*'.
- Reference to the housing provision targets set out in draft RSS (2005) would be helpful.
- Welcome that the issue of housing mix has been covered.
- Encouraged to see that the issue of affordable housing is addressed in the Issues and Options document.
- Welcome the provision of healthcare facilities in the city centre.
- Welcome the emphasis on focussing office development in the city centre.

- Raise specific issues that there is no reference in this document to the accessibility criteria set out in the RSS.

I trust that the comments provided here, and expanded on in Annex A, are helpful to you as you prepare the City Centre Area Action Plan: Preferred Options. Clearly we wish to see the City Centre Area Action Plan developing in general conformity with the Regional Spatial Strategy and I would happily 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 City Centre Area Action Plan and to commenting on the Preferred Options document in due course.

Regards

A handwritten signature in blue ink, appearing to read 'Jenny Poxon', written in a cursive style.

Jenny Poxon  
Head of Planning Delivery and Conformity

## **Annex A**

### **General Conformity with the Regional Spatial Strategy**

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

We therefore welcome the references at the start of the document to draft RSS (2005). It is clear that the CCAAP has been drawn up within its wider spatial planning context. It will be important in the submitted City Centre Area Action Plan to highlight the need for there to be 'general conformity' between the RSS and the City Centre Area Action Plan, to ensure that the two strands of the development plan are mutually supportive. We therefore think it would be helpful if this need for general conformity were set out at the start of the document as this demonstrates the need for a strong link between the LDF and the RSS and will help to clarify the significance of the references to the RSS that are made throughout the document.

### **The Spatial Options**

The aim of the existing RSS (December 2004) is to guide development to sustainable locations and to focus development in main urban areas, market and coalfield towns (Policy P1). This key strategic approach is reinforced in the Yorkshire and Humber Plan (Draft RSS December 2005 and Proposed Changes to Draft RSS September 2007), which is more specific about the desired location of development in Policies YH1 to YH8.

It should be noted that the 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 will use the terminology of the Proposed Changes to RSS.

Policies YH1 to YH8 provide a policy context and direction that emphasises the need to concentrate development in Sub-Regional Cities and Towns, provide for sufficient development in Principal Towns for them to fulfil their important role and to allow limited development in Local Service Centres, primarily to meet local housing needs and to support economic diversification. The overall aim is to reverse the trend of dispersal of development, encouraging a settlement pattern that helps to fulfil the RSS objectives.

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 Assembly **supports the two strategic options; the '*Established Option*' and the '*Emerging Option*'** for the future of the city centre, as they both seek to locate housing, employment, shopping, leisure, education, health and cultural activities and facilities within Bradford City Centre. These two options are in line with the spatial vision of the draft RSS (2005).

### **City Living and Community Provision**

The Assembly welcomes the reference to regional policy which encourages city and town centres as locations for housing as it aids the creation of more sustainable urban areas, by being in close proximity to jobs, transport interchanges and key services.

#### *Issue 1      The Amount of New Housing to be located in the City Centre*

The Assembly **welcomes Option a)** which provides for the Area Action Plan to indicate a housing target which comes from a percentage of figures contained in the RSS. It would be helpful if a reference was made to the housing provision targets set out in draft RSS (2005). Draft RSS (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. It should be noted that the Secretary of State's Proposed Changes to draft RSS recommends an annual average net addition of 1560 dwellings between 2004-2008 and 2700 dwellings between 2008-2026.

*Issue 3      The Types(s) of Housing to be encouraged in the City Centre*

The Assembly **does not wish to make specific comments on this issue.** However it is encouraging that the issue of housing mix has been covered. The Assembly would like to draw your attention to Policy H4 in draft RSS (2005) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation 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.

*Issue 4      Affordability*

The Assembly is **encouraged** to see that the issue of affordable housing is addressed in the Issues and Options document. Current RSS (December 2004) 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) 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 is affordable in Bradford. However, the Assembly recognises that different markets lead to a higher need for affordable housing in some parts of the district. Policy in the emerging RSS gives local Planning Authorities the discretion to vary targets within the Plan area.

You may well be aware that the Assembly is about to commission additional work on Strategic Housing Market Assessments. This will provide additional evidence that will be available to feed into later stages of City Centre Area Action Plan preparation.

*Issue 5      The Need for Primary Education in the City Centre*

The Assembly **does not wish to make specific comments** on this issue.

*Issue 6      The Need for Healthcare Facilities in the City Centre*

The Assembly **welcomes Option a)** which encourages the development of, and allocation of sites for the provision of healthcare facilities in the city centre. The Secretary of States Proposed Changes to draft RSS (2007) recommends changes to Policy ENV11, which provide for major healthcare facilities to be retained and developed within Sub Regional Cities (such as Bradford).

## **Shopping and Leisure**

The Assembly **does not wish to make specific comments** on this issue.

## **Business**

The Assembly **welcomes** the reference to the draft RSS (2005) which identifies Bradford as a sub regional centre within Leeds City Region. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the term "Regional Centres" with "Regional Cities".

The Assembly is **encouraged** to see that the Bradford City Centre Area Action Plan Issues and Options document places much emphasis on focussing office development in the city centre. This spatial approach to office development is fully supported by the Assembly. Both current and draft RSS seek to locate office uses in city or town centres. Policy E4 of current RSS (December 2004) specially states, "offices should be located in town and city centres". Policy E2 of draft RSS (December 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." It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) does not alter the policy context of Policy E2.

## **Further and Higher Education**

The Assembly **does not wish to make specific comments** on this issue.

## **Movement**

The Assembly wishes to raise the issue that there is no reference in this document to the accessibility criteria set out in the RSS. Ensuring the accessibility of development by non-modes is a key principal of regional planning policy. 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) and they provide guidance for developments in terms of their accessibility to employment and social infrastructure uses. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) maintains these criteria.