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Dear Andrew

Bradford District Local Development Framework – Core Strategy Issues and Options Initial Consultation (Regulation 25)

The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Core Strategy Issues and Options document for Bradford 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 Core Strategy 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) and the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005).

The comments place emphasis on the draft Regional Spatial Strategy (RSS), which reinforces and develops the general thrust of existing RSS; furthermore it is more

up to date and has significant "weight" in its own right. Prior to adoption (expected late 2007), the weight attached to the draft RSS will increase once the Panel's Report is received (expected early April 2007) and also when proposed changes are published (expected Summer 2007).

Overall, we feel that the consultation papers, the options within them and the sustainability appraisal provide a comprehensive review of the issues facing the Bradford District and how they might be tackled in order to achieve sustainable development.

Key Points on the Core Strategy: Issues and Options

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

1. Proposed settlement hierarchy and development approach is supported.
2. Support the reference to the housing targets of draft RSS.
3. Inclusion of a reference to the work undertaken across the region into provision of sites for Gypsies and Travellers would be helpful.
4. Support focussing the majority of economic development in the city and town centres.
5. Support the protection of employment land.
6. Overall principles set out in Topic Paper 5: Transport and Accessibility are supported.
7. Overall principles set out in Topic Paper 6: Community Facilities are supported.
8. References to draft RSS Policy ENV5 and potential energy targets are supported.
9. The utilisation of RSS figures in Topic Paper 8: Waste Management is fully supported.

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

Regards

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

Jenny Poxon
Head of Planning Delivery and Conformity

ANNEX A: BACKGROUND INFORMATION RELEVANT TO THE PREPARATION OF CORE STRATEGY ISSUES AND OPTIONS INITIAL CONSULTATION (REGULATION 25)

Topic Paper 2: The Spatial Vision and Strategy for Bradford

We welcome the references to RSS and the summary that provides the context for this consultation paper. There is clearly a strong link between the overall vision and spatial objectives for the Local Development Framework that are set out in the Core Strategy, and with both the current and draft Regional Spatial Strategies.

The Assembly is encouraged by the reference in paragraph 5.4 to the Regional Settlement Study, which identified the following as Local Service Centres in the Bradford District: Addingham, Bingley, Burley in Wharfedale, Denholme, Harwood/Crossroads/Lees, Menston, Queensbury, Silsden, Steeton with Eastburn and Thornton. The RSS makes it clear that that this Study was a starting point from which local planning authorities would need to identify the Local Service Centres in their areas – based, for example, on the more local studies that are summarised in these documents - that should provide a focus for limited housing and economic development.

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), which is more specific about the desired location of development in Policies YH1 to YH8. These clearly provide a policy context and direction that emphasises the need to concentrate development in Regional and Sub-Regional Centres, provide for sufficient development in Principle Service Centres for them to fulfil their important role and to allow limited development in Local Service Centres, primarily to meet local need for affordable housing and to enable 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.

The Assembly supports the proposed settlement hierarchy and development approach. However, on page 27 the Assembly does not support Options B – Dispersal of Growth or Option C – Focused Growth Poles as these options would not be in conformity with current or draft RSS. However, Growth Poles may be in conformity depending on location of the growth poles and evidence of inadequate capacity to meet all development needs in the sub regional centre or principle service centres. In the view of the Assembly the preferred option would be Option A – Regeneration and Selective Growth, which focuses development and redevelopment in the main urban area of Bradford.

Topic Paper 3: Meeting the need for Dwellings in the District

We welcome the references to RSS and the summary that provides the context for this consultation paper. The Assembly supports the references to the housing targets of draft RSS, which proposes that Bradford's housing requirement should

increase above existing targets identified in existing RSS (2004) of 1,390 new dwellings per year to 1,560 by 2011 rising to 2,180 by 2021 to meet future demand.

It is pleasing to see that the Options given on page 8 provide an urban focus to development, however by allowing peripheral towns and villages to enlarge (including the use of safeguarded land and/or green belt would not be a feasible option). However see comments above regarding spatial options.

We are pleased to see the issue of affordable housing covered in the Issues and Options document. As the Council prepares the Core Strategy it will obviously be able to take into account the Local Housing Assessment (referred to on page 5). Draft RSS (2004) Policy H3 advises local authorities to seek less than 29% affordable housing on developments of more than 15 homes in areas of low need, of which Bradford is one. 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 Core Strategy preparation.

It would be helpful to also include a reference to the work recently undertaken across the region into provision of sites for Gypsies and Travellers. Circular 1/2006 Gypsies and Travellers refers to the RSS strategic role in determining distribution of additional pitches. Sheffield Hallam University produced an interim regional assessment that informed the debate at the Examination in Public. More recently Communities and Local Government has issued practice guidance on preparing the strategic regional overview on pitches. The Sheffield Hallam study should form part of the evidence base. Policy H5 of draft RSS identifies the need for local authorities to undertake a local assessment of the housing needs of Gypsies and Travellers, the results of which should feed into the preparation of local development frameworks.

Topic Paper 4: Economy and Jobs

We welcome the references to RSS and the summary that provides the context for this consultation paper. In relation to economic development, the 'key message' from draft RSS for Bradford is *"There should be a significant sustainable supply of land for all employment uses given the strong growth forecast and to reflect the emphasis on Bradford in the sub area "* (Draft RSS, Table 14). The Forecast Change in Total Employment Land in Use 2006 – 2016 is -15 to 44 ha (Draft RSS, Table 14.6).

Paragraphs 3.7 to 3.11 discuss the regionally forecasted demands for employment land in Bradford. Notwithstanding the view that there is potentially an oversupply of unsuitable sites, it will be worth emphasising that these forecasts look at net, not gross changes to the amount of land in productive use. Therefore, it needs to

be recognised that a significant bank of employment land will be required to facilitate proper choice, movement and “churn” in the market.

Paragraph 3.11 refers to more recent forecasting work that generates more optimistic econometric results. It should be emphasised that this work is based upon work carried out as part of the 2nd iteration of the Leeds City Development Programme (CRDP). It reflects, in common with the other CRDPs, a series of planned investments and interventions that all need to be delivered in order to realise the higher levels of growth. On this basis, the Core Strategy needs to identify which of these major projects it is able to support and make provision accordingly.

Key Question 4.2 sets out a number approaches to providing differing levels of employment land. While there are options to determine the *amounts* of land, these options do not ask meaningful questions about the mix of sites that should make up the employment land portfolio. Perhaps a more pertinent question would be to examine how different types of sites and premises could deliver the *economic strategy* for Bradford.

Paragraph 3.22 sets out some critical issues. The Assembly strongly supports these matters being pursued in the core strategy.

The Assembly supports the focussing of the majority of economic development in the city and towns centres (1st bullet point, Key Question 4.3), especially in relation to office and other high-trip generating uses.

The Assembly supports the protection of employment land (Paragraph 3.23). However, this should only be in cases where the loss of such land would undermine the achievement of the sustainable renaissance of the main urban areas.

Specific note:

Under Paragraph 2.6 (WY Investment Plan) it would be advantageous to recognise other sub regional analysis, such as the West Yorkshire Office Floorspace Study.

Topic Paper 5: Transport and Accessibility

The Assembly overall supports the principles outlined in this document. However in regards to the Options relating to the issue congestion on page 9, the Assembly does not support locating development in areas of low public transport accessibility but good road connections as a means of influencing levels of car use and road congestion.

It is suggested that the Influences section (page 2) needs to respond to the new approach to housing accessibility and car parking as set out in PPS3. It would also be helpful to include after the “Regional” sub-heading a reference to the Leeds City Region Transport Vision as set out in the City Region Development Programme. The City Region Vision work should also be included in the evidence base.

Topic Paper 6: Community Facilities

The Assembly overall supports the principles outlined in this document. However in regards to the Options for access to shopping facilities on page 10, the Assembly feels that to amend the hierarchy for example by re-designating Silsden and Queensbury from local centres to higher order status as significant freestanding settlements would not be in general conformity with the spatial vision of draft RSS (2004).

Topic Paper 7: Environment

The Assembly welcomes the references to draft RSS Policy ENV5 and to the potential energy targets for 2010 and 2021; identified as 80 MW and 270 MW, which were taken from the Sub Regional Renewable Energy Assessment and Targets Study (2004). However, it would be helpful to make reference to Bradford's indicative renewable energy target of 10.7 MW in draft RSS.

To further encourage the development of renewable energy resources, it would be helpful to reflect Policy ENV 5B (iii) of draft RSS (December 2005) at a local level in the Core Strategy.

In regards to the issue of flooding the Assembly prefers the final Option given provided that "restrictions on intensity, form and type of development" are appropriate and that it is assumed that the first option would lead to development in unsustainable locations and the second option would lead to problems with public safety and insurance.

Paragraph 3.44 confirms that while there are reserves of sand & gravel and certain other minerals in the Bradford district, no extraction is currently taking place. On this basis, and given the pressing shortfall of sand & gravel supplies in West Yorkshire, the Core Strategy will need to refer to the outcomes of the regional Sand & Gravel Study (Phase 2). This Study is intended to be complete by the end of 2007, and will offer regional guidance on a sustainable pattern of future extraction to meet the future economic needs of the region.

The Assembly can also confirm that it intends to scope potential work on non-aggregate minerals in 2007-8. This will include looking at the potential RSS role in providing specific guidance on energy, industrial and block/dimension stone.

Topic Paper 8: Waste Management

The Assembly fully supports the utilisation of RSS figures in the Waste Management Topic Paper. It is suggested that reference be made to annually updated waste data as provided in the Yorkshire & Humber Regional Technical Advisory Body (RTAB) report. It is confirmed that the latest data formally published by the RTAB is found within the RSS Examination in Public Core Library Document "Revised Waste Data & Strategic Messages" (August 2006). The Assembly has put in to place mechanisms (via a regional concordat with the Environment Agency) to

allow revised waste data to be issued on an annual basis from 2007 onwards.

This document sets out more updated data and includes an analysis of a sub regional "capacity gap" for waste management facilities. In terms of West Yorkshire, the most significant strategic message is that -

The region has poor levels of provision for large scale composting, with almost 75% of current capacity located in the Humber sub region. West Yorkshire, despite generating the largest proportion of MSW, has only 5% of current capacity.

Paragraphs 3.1 to 3.17 Bradford Waste Management Topic Paper set out a very clear context for waste management in Bradford and there is a commendable commitment to manage waste in a more sustainable manner. However, the Assembly would suggest that the final Core Strategy makes a clear reference to the opportunities for a plan-monitor-manage based approach enabled by the annually RTAB Waste Data Report.

In terms of specific questions and options, the following comments are offered:

Paragraph 3.25, bullet #4 suggests "smaller bin areas" as a possible means of facilitating waste minimisation. This proposal is not supported as draft RSS makes it clear that **more** space will be required in layouts to allow for the segregation and recycling of different waste types in new development.

Under paragraphs 3.26 various approaches for re-using waste in construction are discussed. The Assembly suggests that the concept of waste audits for significant developments is promoted, as outlined in Draft RSS.

The text supporting Question 8.2 (Waste Recycling) could better distinguish between issues associated with the **collection** of materials for recycling and the **utilisation** of recyclates.

Paragraph 3.31 sets out some options for considering the future provision of landfill capacity in Bradford. While it is acknowledged that in the foreseeable future there will be requirement to landfill the final residues of treatment, the final Core Strategy should use the ability to limit landfill provision as a key means of drive waste up the hierarchy.

In response to Question 8.7 (site selection criteria and the role of allocating sites), the Assembly would strongly suggest that the Bradford LDF adopts an approach based on -

- Specific sites allocated to facilitate a network of strategic sites – for example to accommodate waste treatment facilities, major transfer stations and landfill. These should be capable of delivering the Bradford Waste Management Strategy, and should (ideally) be of sufficient size to allow for the co-management of waste streams other than MSW.

- A robust criteria approach to the delivery of a larger number of smaller or community based facilities (e.g. local composting or bring sites).

Paragraph 3.33 raises three options for the provision of sites for waste treatment facilities. It is suggested that the Core Strategy will need to recognise that for industrial & commercial (I&C) and hazardous wastes, there may be advantages in accommodating facilities which handle wastes from an area greater than the Bradford District. I&C and hazardous waste arisings are made up of a number of specific waste sub-streams, it will not always be practical, or indeed the most sustainable solution, to process all of these wastes within one district. On this basis, it may necessary to consider a specific amendment to the "Vision" (Page 4) in relation to the cross boundary movements of specific waste streams.