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19 August 2008

Aaron Casey
Planning Services (East)
City Development
Leeds City Council

By E-Mail

Dear Aaron,

Planning Application Number: 08/03752/FU

Laying out of access and erection of 3 storey office block with 36 car parking spaces and landscaping

The Assembly is grateful for the opportunity to comment on this proposed development. 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 - The Yorkshire and Humber Plan was issued by the Secretary of State in May 2008. 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.

Regional Policy Context

Policies in RSS seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Towns to enable them to fulfil their role as service centres.

Location of development

The proposed development is located to the north-east of Leeds. Leeds is identified in RSS as a Regional City. Policy YH4 of RSS states that Regional Cities should be the prime focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region. According to our maps the site is just outside the boundary of the main built up urban area for Leeds Regional City.

Town Centre Uses

Policy E2 of RSS provides for plans, strategies, investment decisions and programmes to strengthen the role and performance of existing city and town centres. Policy E2 emphasises that the centres of Regional Cities and Sub Regional Cities and Towns should be the focus for offices, retail, leisure, entertainment, arts, culture, tourism and more intensive sport and recreation across the region.

The City Council should be satisfied that sufficient office development is being directed to the City Centre and other town centres prior to granting permission for this proposal. The proposal by virtue of its scale has the potential to impact upon the role of Leeds City Centre and nearby town centres as the focus for office development.

In accordance with Policy E2 the majority of office development should be occurring within Leeds City Centre, then town centres and principal towns and then allocated sites.

The Assembly would have concerns if the proposed office development would have potential to harm the city centre and viability of office markets in nearby town centres such as Seacroft, Colton and other town centre office markets. The Assembly is not convinced that such an office development would be difficult to locate in the City Centre or other town centres as it is of a medium size.

Accessibility

Accessibility criteria are set out in RSS (Table 13.8 and 13.9). These tables include acceptable walking and overall journey times for the population that would be travelling to the site. The location of the development raises concerns around its accessibility and the City Council should be satisfied that such a proposal is in line with RSS Policy T1 which aims to reduce travel demand and improve access by public transport and non-car modes.

The proximity of the site to the M1 motorway and apparent lack of strategic public transport does not seem to accord with RSS Policy T1 as it would likely lead to a large amount of car generated trips.

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

Renewable Energy

The sustainable use of resources is a key theme in RSS. Policy ENV5 states that in advance of local targets being set in DPDs, new developments of more than 10 dwellings should secure at least 10% of their energy from decentralised and renewable or low carbon sources.

Conclusion

Given the issues set out above, the Assembly offers the following comments, that:

- The development raises an issue in that the location of the development runs counter to the Yorkshire and Humber Plan's Policy E2 on the location of office development and has the potential to undermine the role of the City and town centres within the Leeds Sub-Regional City, and
- The development raises an issue in that its location has potential to run counter to the Plans Regional Transport Strategy and the need to locate development where it is accessible to a range of modes of transport especially public transport.

If you have any queries about these points, please do not hesitate to contact Martin Elliot on 01924 331594.

Yours sincerely

Mart' - Elliot

Martin Elliot
Planning Policy Manager