

Your ref

Our ref GJR/GL

Cllr Keith Wakefield
Leader
Leeds City Council
4th Floor East
Civic Hall
LEEDS LS1 1UR



3 August 2011

Dear Keith

REPORT TO DEVELOPMENT PLAN PANEL 9 AUGUST 2011 - Agenda Item 7: Leeds City Centre, Town and Local Centres Study.

We are writing as owners of the White Rose Centre and founder members of the Investment Partnership for South Leeds (IPSL) to raise our profound concerns about the above report.

We have met the planning officers who have written the Panel Report and it has been confirmed that the Report is a précis of the Colliers Study and in no way represents an opinion or recommendation of the City Council or its officers. It merely serves to update and inform the Panel of progress. We are grateful for that confirmation.

We are advised that the Colliers Study to which the Panel Report relates is not complete and whilst the Study is noted as a Background Paper the Study is not yet publically available. Consequently we are unable to look behind the Panel Report and examine the Study itself. When we have sight of the Study we will review and make further comments and representations as necessary.

In the meantime we have read the Panel Report in detail and we feel it is important to make the following points that we feel are fundamental.

1. Paragraphs 3.33, 3.34 and 3.35 of the Panel Report records Colliers opinions about the future of retail in South Leeds and, in particular the White Rose Centre. These fail to have regard to a wider context. In particular they pay no regard to the benefits of the White Rose Centre to the local economy, the positive work that has been undertaken through the Investment Partnership, reference to the officers and members that have worked hard to produce the Investment Strategy for South Leeds and the views of the public in the area that have been engaged over the past 2 years. Colliers should have been made aware of this work in their brief, and the report should not include discordant and unjustified paragraphs that pre-determine the strategic content of the Core Strategy.
2. Colliers comments on the future direction of retail in Leeds give no weight to issues of regeneration. This is at odds with both PPS4, and the National Planning Policy Framework and undermines the emerging approach for the future of South Leeds and the important potential role that retail and office development might play in that.

(cont / 2)

3. The assessment of the requirement for new retail development and retail need is based on, amongst other considerations, projected population growth. This is clearly a fundamental issue and Members of the Panel should be satisfied that these figures have a sound basis. Critically, as a result of the Investment Strategy, Leeds City Council Members have asked that options be considered for major growth in South Leeds together with the benefits that may result. This will have a potentially significant impact on that identified demand for Outer South Leeds (para 3.33).
4. The report is based on a basic premise of caution (para 2.5.) and states that the retail strategy for the LDF should be focussed on potential retail floorspace to 2016 only (para 3.30). This is contrary to NPPF which seeks a 15 year approach and cannot be appropriate in developing future policy for the city where projected demand to 2026 is in all cases significantly higher than that for 2016.
5. The views attributed to Colliers are based on outdated policy. The recently published National Planning Policy Framework seeks to support economic development and excludes office development from a sequential test approach. This has potentially profound implications in planning for sustainable places that respond to market demand and deliver mixed use. Moreover, the HM Treasury 'The Plan for Growth' seeks to prioritise growth and job creation through a presumption in favour of sustainable development.
6. Account must also be taken of the intention to abolish the Regional Spatial Strategy. The justification for Policy E2C which applies to the White Rose Centre is that there was no evidence to support major development. It appears that the Colliers Study now provides evidence to support additional development, but in Colliers opinion development should be accommodated elsewhere. This view is based on existing policy (a key part of which is to be abolished) and assertions about the impacts of development on the City Centre and other centres for which there is no indication that the assertions are based on evidence or analysis. Furthermore, there appears to have been no consideration of alternative approaches, the wider economic context and whether the requirement arising at the White Rose Centre is transferable.
7. The Study clearly identifies retail need in the order of 100,000sq. m. for the Outer South zone and that provides a positive basis for economic growth in South Leeds in line with the work of the IPSL. White Rose is an economic asset for South Leeds, Leeds and the wider City Region and it should be recognised as having the potential to play a bigger role on all fronts. Land Securities is investing £360m in Leeds city centre and is continuing to invest in White Rose. The ability to continue to invest in both schemes provides hard evidence that the two can add to the regional economy and investment at White Rose should not be curtailed based on the Colliers Study.

In conclusion, we feel strongly that were the Colliers report to be published as indicated in the Panel Report, the positive partnership working that has been established in South Leeds would be critically undermined and key strategic policy decisions for the Core Strategy would be unacceptably premature. Therefore, for the reasons outlined above, we would strongly request the Committee to reject those elements of the Colliers Study which address the issues of where the requirements for additional development should be located. We believe that the Panel should look to the IPSL Investment Strategy as a key reference for the emerging Core Strategy as this document has been widely debated with the South Leeds community and stakeholders and is one of the most up to date pieces of research and reports available for this key area of Leeds.

(cont / 3)

Please note this letter is sent on behalf of Land Securities, Evans Property Group and Millshaw Property Company Ltd.

Yours sincerely

Gerald Jennings

Portfolio Director

Retail Portfolio Management

gerald.jennings@landsecurities.com

D/L 0113 261 5355

cc:

Phil Crabtree, Chief Planning Officer, LCC

Steve Speak, Deputy Chief Planning Officer, LCC

Paul Stevens, Head of Economic Policy, LCC

Sue Speak, Team Leader Planning & Economic Policy, LCC

Guy Close, LCC Committee Clerk

Cllr Neill Taggart, Chair of LCC Development Plan Panel

Martin Farrington, Director of City Development

Cllr Richard Lewis, Chair of IPSL Steering Group

Tom Riordan, Chief Executive