



Hammerson

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Your ref

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Ms S Speak
Team Leader, Local Planning East
Forward Planning and Implementation
Leeds City Council
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Dear Sue

Leeds City Centre, Town and Local Centres Study

We write in relation to the above document which we understand will be the subject of a report taken to the Development Plan Panel tomorrow (Tuesday 9 August). The report summarises the findings of the Study, which was published on the Council's website over the weekend.

Whilst we are still reviewing the contents of the Study and the detailed technical appendices in order to fully understand the methodology and assumptions used to reach its conclusions, we would like to take this opportunity to place on record our initial concerns.

As you will be aware, Hammerson UK Properties Plc is a major stakeholder within the City and is committed to delivering the major redevelopment of the Eastgate and Harewood Quarter in Leeds City Centre. Whilst the project has been delayed as a result of the recent economic uncertainty, we have recently progressed a revised scheme (under application 11/01000/OT) that received a resolution to grant planning permission at the Plans Panel on 7 July 2011. We are currently working with officers to complete the associated S106 Agreement and we therefore hope planning permission will be issued shortly.

As a result, we have maintained a keen interest in the production of the Leeds City Centre, Town and Local Centres Study, which you commissioned Colliers International to undertake in July 2010.

The findings of the Study will form an important part of the evidence base of the Local Development Framework (LDF) and will be used to inform future policy direction and development control decisions within the City.

Having reviewed the Development Plan Panel report, Hammerson has a number of concerns in relation to the findings and approach adopted in the Study and wants to raise these now. Our comments are made in the context that the Study needs to be robust in its findings and recommendations and set out clear advice to the Council on future policy formulation. We set out our comments below.



Eastgate

The Panel Report notes the existence of the Eastgate scheme as a significant commitment within the City Centre. It is imperative that the maximum levels of retail floorspace that can be provided under the extant permission and the recent resolution are included within the Study as firm commitments and deducted from the overall retail capacity figures.

Future Retail Capacity

The Panel report notes that the Study calculates convenience and comparison goods floorspace capacity based on existing market shares within each of the district zones. In simple terms this can be broken down into the City Centre and other areas beyond the City Centre but within the Council's administrative boundary.

At the time of writing, we have not had the opportunity to critically review the methodology and approach adopted by Colliers in calculating the level of future retail capacity and as a result has had to take the figures quoted in the Panel Report at face value. We do however reserve the right to make further submissions on this point in due course.

The City Centre

The Report correctly identifies both the Eastgate and Trinity schemes in Leeds as commitments and as a result, the floorspace delivered by these two major schemes has been deducted from the future retail capacity calculations in the Study. However, the Report notes that in addition to these two major schemes, the Study calculates there will still be further capacity of 24,404 sq m net of comparison floorspace in the City Centre at 2016, rising to 40,177 sq m net at 2026.

Whilst this in itself is a significant amount of additional retail floorspace (effectively an additional Trinity scheme), Hammerson welcomes the acknowledgement in the Panel report that given the commitments of Trinity and Eastgate there is no need to identify further allocations or specific proposals for the City Centre. First priority should be the delivery of the Eastgate scheme given its policy compliant location, its importance to the City, and the wider benefits it will deliver. Acknowledgement that the UDP Shopping Quarter will accommodate the committed and additional growth (through reconfiguring and remodelling existing floorspace) is welcomed and supported.

It is both correct and proper to allow these two significant schemes to come forward as priorities and then to allow the City Centre to readjust and consolidate as the two schemes will lead to a restructuring and realignment of retailers and service providers within the City Centre. Only once this readjustment of the City Centre retail offer has taken place should the Council consider further significant development schemes or policy strategies.

This is particularly important, as the Report notes, given the current economic conditions and the uncertainty relating to future expenditure and population growth. It is correct to adopt a cautious approach and to review the position on a regular basis.

Non City Centre Locations

Beyond the City Centre, the Study identifies further capacity of 111,172 sq m net of comparison floorspace at 2016 rising to 138,024 sq m net at 2026. The majority (100,012 sq m at 2016) of this capacity is generated by the existing trading position of White Rose. White Rose is not a



defined centre in policy terms (at any level) and it is important as the Report notes that the Study and subsequent planning policy provides no support for its further expansion.

Indeed, Hammerson supports the position adopted by Colliers in the report, that:

"given national guidance, the currently extant RSS and Leeds' own policy, together with the aims and objectives relating to town centres in neighbouring Districts, there is no case for supporting additional development at White Rose....While new proposals are emerging it would be inappropriate for development to take place at White Rose which might deter investment in committed city centre schemes, as well as denying trade to established town centres within Leeds and elsewhere."

Any significant out-of-centre retail development will have an impact on the deliverability of the Eastgate scheme and investment in other identified centres. Whilst planning policy at the national level is evolving, it is clear in the recently issued draft National Planning Policy Framework that the Government remains committed to its town centre first approach embodied in PPS4 and before that PPS6. The sequential and impact tests remain key threads of national policy.

Hammerson is therefore extremely concerned that the Study should give no encouragement for further large scale retail schemes in non-central locations and in particular the further expansion of White Rose. Given the importance of the Eastgate scheme to Leeds City Centre and the wider benefits it would deliver, it is imperative that nothing should prejudice that scheme coming forward. The Study and the subsequent planning policy formulation should make this position clear.

Only when both Trinity and Eastgate have been delivered and the City Centre allowed to readjust and consolidate should any major new developments be considered, and tested against the relevant planning policy in force at that time. This will not be before 2016, and is unlikely to be in out-of-centre locations. Both the Study and future planning policy should be explicit in this regard.

Next Steps

We would be grateful if these comments could be reported to the Panel on Tuesday (9th August) and taken into consideration in the future evolution of planning policy.

As noted earlier we are still reviewing the contents of the Study itself in order to fully understand the methodology and assumptions used to reach its conclusions, and we reserve the right to make further comments/representations in this regard. We did however believe it important that we take this opportunity to place on record our initial concerns in order that these could be highlighted to members.

Yours sincerely



Mike McGuinness
Development Director