



Report of the Chief Planning Officer

PLANS PANEL CITY CENTRE

Date: 22 December 2011

Subject: 11/04023/FU PART 6 AND PART 10 STOREY MIXED USE DEVELOPMENT COMPRISING OFFICE SPACE (CLASS B1) AND 130 BED HOTEL (CLASS C1) WITH BASEMENT CAR PARKING AT WHITEHALL ROAD, LEEDS, LS1 4BN

APPLICANT

Gregory Projects Ltd, CDP
Ltd And Whitbread Group
PLC

DATE VALID

23 September 2011

TARGET DATE

23 December 2011

Electoral Wards Affected:

Yes

Ward Members consulted
(referred to in report)

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

RECOMMENDATION:

Defer and delegate to the Chief Planning Officer for approval, subject to the specified conditions (and any others which he might consider appropriate), and following the completion of a Section 106 Agreement to cover the following matters:

- **Contribution to public transport improvements in accordance with SPD5 prior to first occupation £97 496**
- **Car club space and trial provision prior to first occupation £2500**
- **Public access around the site**
- **Travel plan implementation and monitoring fee prior to first occupation £4750**
- **Employment and training opportunities for local people.**
- **Management fee payable within one month of commencement of development £1500**

In the circumstances where the Section 106 Agreement has not been completed within 3 months of the resolution to grant planning permission the final determination of the application shall be delegated to the Chief Planning Officer.

Conditions for 11/04023/FU

1. Time Limit (3 years)
2. Development in accordance with approved plans
3. Samples of all external walling and roofing materials.
4. Construction of a sample panel of all external walling materials
5. Samples of all external surfacing materials
6. Detailed 1:20 scale working drawings shall be submitted including cross sections of ground floor treatments, window bays and roofline/eaves
7. Hard and/or soft landscaping scheme
8. Maintenance of landscaping scheme
9. Details of tree pits
10. Waste storage and disposal details, including recycling and details of security of and access to the bins.
11. Provision of cycle and motorcycle parking
12. Details of installation and operation of air conditioning including odour filtration
13. Details of a noise attenuation scheme including all plant
14. Contaminated land information
15. Amendment of remediation statement
16. Submission of verification reports
17. Specified hours for delivery, loading and unloading 0900 -1800 Monday to Saturday with no such operations Sundays and Bank Holidays
18. Details of works for dealing with surface water discharges from the development required.
19. No piped discharge of surface water from the development prior to completion of approved surface water drainage works.
20. Dust suppression measures during construction.
21. Means of preventing mud on the highway
22. Details of contractor's cabins, parking, access and traffic management
23. Construction working hours 0730-1900 hours weekdays, 0800-1300 Saturdays
24. Submission of detailed scheme comprising (i) a recycled material content plan (using the Waste and Resources Programme's (WRAP) recycled content toolkit), (ii) a Site Waste Management Plan for the construction stage, (iii) a waste management plan for the buildings occupation and (iv) a BREEAM assessment to at least Very Good rating or equivalent
25. Implementation of off-site highways works
26. Details of car park management plan
27. Implementation of flood risk assessment measures
28. Areas to be used by vehicles to be laid out prior to occupation

The following are non standard conditions which can be found in full in the Appendix –

25, 27

Reason for approval 11/04023/FU:

The application is considered to comply with the policies GP5 GP7 GP12 BD6 A1 A4 N12 N13 N14 N15 N16 N17 N25 N29 BD4 ARC6 CC1 CC3 CC10 CC11 CC12 CC13 CC19 E14 CC27 Prime Office Quarter Proposal Area Statement 1 T2 T2D T5 T6 T7A LD1 of the UDP Review 2006, the Yorkshire and Humber Regional Spatial Strategy 2008, as well as supplementary planning guidance in SPD5 Public Transport Improvements and Developer Contributions, SPD Travel Plans, SPD Sustainable Design and Construction, and the City Centre Urban Design Strategy, and national guidance contained within PPS1, PPS4, PPG13, and PPS25 and having regard to all other material considerations, as such the application is recommended for approval.

INTRODUCTION:

1.1 This application is brought to Panel as it is a significant major application.

2.0 PROPOSAL:

2.1 The application proposal is for a part 6 part 10 storey mixed use development comprising 6000 square metres of office space and 130 bed hotel, to be operated by Premier Inn.

2.2 The ground floor of the building consists of office accommodation at the western end of the building, with a hotel reception and restaurant at the eastern end. The office accommodation would be located from first to fourth floor and the hotel accommodation from fifth floor to ninth floor in a L-shaped plan. All plant equipment is located behind a parapet at the fifth floor, below an area of green roof.

2.3 The materials palette would consist of a mix of ceramic rainscreen cladding and zinc rainscreen cladding, with a regular window pattern set within deep reveals.

2.4 The ground floor level of the building would be raised by some 1.25m to meet the flood risk assessment. The building would be accessed from ramps at the eastern and western ends of the building, with the hotel entrance on the new pedestrian route to the riverside at its corner with Whitehall Road, and the office entrance being centrally located on the Whitehall Road elevation. A pedestrian walkway would run along the Whitehall Road elevation on the raised floor level.

2.5 Servicing and car park access is achieved from the ramp at the southern elevation entrance, with the basement capable of accommodating 38 cars (including 8 for hotel use, and 30 for office use including 2 car sharer bays and 2 disabled bays), together with refuse and secure cycle and motorcycle storage facilities. 6 car parking spaces are at surface level, these include three for office use, one car club space, and two disabled bays for hotel use. The service road currently serves No.1 Whitehall Riverside, and would be extended westwards to serve new developments as they are delivered.

2.6 Surfacing consists of a variety of materials, with block paving to main footways, block paving setts to car parking bays, coloured tarmac to the vehicular routes, and raised grassed areas. Soft landscaping would consist of trees planted at regular intervals to the western and eastern ends of the site.

2.7 In addition to detailed scaled plans, a number of documents have been submitted in support of this proposal:

- Design and Access Statement
- Planning Statement
- Transport Assessment
- Flood Risk Assessment including PPS25 Sequential Test Assessment
- Drainage Statement
- Noise Survey
- Sustainability Statement
- Landscaping details
- Phase 1 Land Contamination Report
- Travel Plan
- Daylight/sunlight study

3.0 SITE AND SURROUNDINGS:

- 3.1 The site is currently an open grassed area, and is bounded at its eastern boundary by a 5m high red brick wall, which partially encloses an electricity sub-station. Immediately to the east of the substation are two very recent constructions: the 14 storey Whitehall Quays residential development, primarily built using red brick and silver cladding; and the 8 storey red brick and stone Novotel hotel on Whitehall Road. The site is in close proximity to a number of large redevelopment sites including the proposed Wellington Place outline scheme to the north of Whitehall Road, the West Point residential scheme (to the north east), No. 1 Whitehall Riverside (immediately to the south), and the 16 storey residential and office block at the western end of the Whitehall Riverside site known as Whitehall Waterfront. The application site has previously formed part of an outline planning permission for most of the south side of Whitehall Road between the end of Northern Street and Monk Bridge. It was allocated for an 8 storey multi-storey car park however the outline permission has now expired. Two subsequent full planning permissions for 10-12 storey office buildings have been granted in recent years, however these have also now expired.
- 3.2 The application site lies within the designated City Centre, as an identified Proposal Area within the Prime Office Quarter (Proposal Area 1 : Whitehall Road (South Side)). This allocates the area as principally office use, with other uses bringing activity and variety. The Whitehall Waterfront and Riverside West mixed office/residential schemes and Whitehall Quay mixed residential/hotel/office scheme have all contributed to this aim. The proposal area also identifies opportunity for small scale retail and food and drink uses. New development should provide for the riverside walkway, and public realm to connect the area to the sites to the north. The development of Whitehall Waterfront to the west and No. 1 Whitehall Riverside to the south under the now expired outline planning permission delivered the riverside walkway for the full length of the wider site, and a pedestrian bridge over the River Aire.

4.0 RELEVANT PLANNING HISTORY:

- 4.1 20/299/00/OT Outline application to erect 4 office blocks 2 residential blocks 2 cafe bars, retail units & multi storey car park – approved 10 October 2001. The current application site was identified as an 8 storey multi-storey car park with ground floor café/bar use under this outline planning permission.
- 4.2 20/192/04/FU Part 10 part 12 storey office block with undercroft car parking – approved 29 July 2004.
- 4.3 06/04682/FU 11 storey office block (elevational changes to previous approval 20/192/04/FU) – approved 9 November 2006.

5.0 HISTORY OF NEGOTIATIONS:

- 5.1 Following the expiry of the above planning permissions, pre-application meetings have been held regarding this site with officers during 2010 and 2011, prior to the submission of a full planning application in September 2011.

6.0 PUBLIC/LOCAL RESPONSE:

- 6.1 Application publicity consisted of:

- 6.1.1 Site Notice of Proposed Major Development posted 14 October 2011, expired 4 November 2011.

- 6.1.2 Press Notice of Proposed Major Development published 5 October 2011, expired 3 November 2011.
- 6.2 Ward Members consulted 3 October 2011 - no comments made at time of writing.
- 6.3 Letter from Leeds Civic Trust, dated 26 October 2011 and email dated 15 November 2011 objecting to the scheme for the following reasons:
- 6.3.1 Concern regarding the manner in which the building plinth interacts with the footpath. The majority of the footpath is lined with the edge of the 1250mm plinth which is then topped with another 1100mm of balustrading, meaning that a pedestrian will be walking adjacent to a wall of around 2300mm. We feel that this interaction could be handled with a little more care.
Response: Revised plans have been received (8 December 2011) which have lessened the impact of the building plinth and balustrade combined height. The balustrade has been set back behind a row of planters in the case of three bays, and an additional flight of steps has been added closest to the office entrance. It is considered that this adequately reduces the dominance of the plinth to the back edge of footway, which is some 2.4m wide at this point.
- 6.3.2 The ground floor plan does show the width of the external staircase to be comparable to the pavement but the floor space available proceeding the staircase is effectively reduced by a quarter because of the positioning of the major structural column. This staircase is the smallest of the three external staircases but is facing the single largest generator of foot fall from the city centre and train station.
Response: The steps are 2.75 metres wide and designed to be comparable to the width of the Whitehall Road public footpath and the raised ground floor colonnade. The inclusion of the accessible ramp and the extended route across to the river restricts the steps to this size. The size of the steps are considered appropriate for the likely flow of pedestrian movement in this area.
- 6.3.3 The landscaping is uninspiring to the east side of the site, as there has been no indication of how this space could be used beyond being a gap in the urban grain. This could simply be addressed by including some seating and some simple low level planting. We feel a few tree canopy shadows would cause minimal impact relative to the shadows created by the existing and proposed buildings.
Response: It is considered that the tree planting proposed is sufficient, and that further planters or seats may clutter this pedestrian area linking Whitehall Road to the riverside.
- 6.3.4 The building could further articulate its mass on the upper floors as it has done on the two lower floors and the rear. All the other buildings along Whitehall Road have some level of articulation, whereas the proposed development presents a sheer wall.
Response: It is considered that the proposed form of the building is in keeping with recent developments in the area, and that whilst the building is a consistent storey height along the Whitehall Road elevation, there is sufficient visual interest in the variation in materials and the relief in the façade created by recesses and reveals.
- 6.4 One letter of objection from a resident of West Point, Wellington Street received 2 November 2011:
- 6.4.1 The distance between the proposed building and West Point is too close.
Response: It is not considered that the relationship between the windows of the

proposed and existing buildings is too close at some 30 metres. It is not considered that the proposed building would have significant impacts on the residential amenity of the residents of West Point.

- 6.4.2 The proposed building would significantly reduce light.
Response : The applicant's architect has submitted a sun path analysis plan. This confirms that there would be little adverse impact arising as a result of this development.
- 6.4.3 The hotel and bar would have a negative impact for residents of West Point.
Response: It has been the policy aspiration of the Council since the 1990s that city centre residential development would be part of a wide mix of uses in the Prime Office and Riverside Quarters including offices, hotels, bars and restaurants, and contribute to the continuation of a successful and vibrant City Centre. The area currently consists of a mix of residential, offices, hotels with supporting ground floor bars, cafes, shops and restaurants. In this context it is not considered that there would be additional adverse impact on residential amenity. However, a condition would be applied to ensure that a sound insulation scheme is submitted to ensure that there is no adverse breakout of noise from the proposed uses and associated plant.
- 6.4.4 The hotel rooms would look directly into apartment rooms.
Response: The windows within the proposed building would directly overlook the West Point building. They would be offset by some 20 metres and the apartment windows at the nearest part of West Point are also set behind balconies. Therefore there would not be opportunity for hotel residents to look directly into residential accommodation.
- 6.4.5 The building is well forward of the building line of adjacent properties. *Response: The proposed building line is broadly consistent to the existing building line, and those approved in 2001 (approved the same year as the West Point development), 2004 and 2006.*
- 6.4.6 The look of the building is not in keeping with the area.
Response: See Appraisal section 10.2 of this report.

7.0 CONSULTATIONS RESPONSES:

7.1 Statutory:

- 7.1.1 Leeds City Council Transport Development Services – no objection subject to the following provisions:
- provision of off-site highways works to enable the future delivery of a 1.5m cycle lane along Whitehall Road including necessary temporary hatching
 - long-stay and short-stay cycle parking spaces
 - a car club bay
 - motorcycle parking facilities
 - travel plan measures
 - shower/locker provision
 - conditions regarding construction cabins and traffic management
- 7.1.2 Environment Agency - no objections subject to specified conditions to ensure the development is carried out in accordance with the submitted flood risk assessment (FRA).

7.1.3 British Waterways – no objection.

7.1.4 Yorkshire Water – no objection subject to specified conditions.

7.2 Non-statutory:

7.2.1 West Yorkshire Archaeology Advisory Service – there are no apparent significant archaeological implications attached to the proposed development.

7.2.2 Leeds City Council Environmental Protection: No objection subject to conditions regarding mechanical plant installation and sound insulation.

7.2.3 Leeds City Council Flood Risk Management: No objection subject to implementation of development in accordance with the submitted FRA, and a condition regarding surface water drainage details.

7.2.4 West Yorkshire Metro: no objection subject to provision of real time bus information in the hotel reception. The applicant has confirmed in the Travel Plan that this would be provided.

8.0 PLANNING POLICIES:

8.1 Development Plan

Regional Spatial Strategy Yorkshire and the Humber 2008

Leeds Unitary Development Plan Review 2006

Relevant policies include:

GP5 all relevant planning considerations

GP7 planning obligations

GP11 sustainability

GP12 sustainability

BD6 all alterations

A1 improving access for all

A4 safety and security provision

N12 urban design

N13 design and new buildings

N29 archaeology

BD2 design and new buildings

BD4 all mechanical plant

BD5 amenity and new buildings

CC1 City Centre and planning obligations

CC3 City Centre character

CC10 public space and level of provision

CC11 streets and pedestrian corridors

CC12 public space and connectivity

CC13 public spaces and design criteria

CC27 Prime Office Quarter

Prime Office Quarter Proposal Area 1: Whitehall Road (South Side)

CC19 Office proposals

E14 Office proposals

T2 transport provision for development

T2D public transport provision for development

T2C Travel plans and new development

T5 pedestrian and cycle provision

T6 provision for the disabled

T7A cycle parking
T7B motorcycle parking
LD1 landscaping

8.2 Relevant Supplementary Planning Guidance includes:
SPD5 Public Transport Improvements and Developer Contributions
SPD Travel Plans
SPD Sustainable Design and Construction
City Centre Urban Design Strategy
Leeds Waterfront Strategy

8.3 National planning policy and guidance includes:
PPS1 Delivering Sustainable Development
PPS4 Planning for Sustainable Economic Growth
PPG13 Transport
PPS25 Development and Flood Risk

9.0 MAIN ISSUES

1. Principle of use
2. Design
3. Transportation
4. Flood risk
5. Sustainability
6. Section 106 Agreement

10.0 APPRAISAL

10.1 Principle of use

10.1.1 The application site lies within the designated City Centre, and is allocated as a specific proposal area within the Prime Office Quarter. UDP Policy CC19 states that office use will be supported as the principal use within the Quarter. Under Policy CC27, proposals for other uses which service the area, add variety and vitality, support the attractiveness of the area and would not prejudice its function, would generally be encouraged. This is supported by the Proposal Area Statement for the area which specifically states that office use would be the principal use, with hotel identified as an appropriate supporting use.

10.2 Design

10.2.1 The design and siting of the proposed building is considered to be appropriate to the scale and character of neighbouring buildings and the surrounding area. It is considered that the siting responds to the context and scale of Whitehall Road as it leads away from the railway station. The scale of existing and proposed buildings is around 8-10+ storeys across the Whitehall Quay, West Point, Whitehall Riverside and Wellington Place sites.

10.2.2 The proposal for this block is considered to be appropriate to the architectural features and materials of surrounding existing and proposed developments. It is considered that the modern, calm design in light ceramic panels would complement the red brick/terracotta, render, silver panelling and glazing of the nearby Whitehall Quay, West Point, Whitehall Waterfront developments. It is considered that this

contemporary design would enhance its setting and start to deliver the next steps in the regeneration of the West End of the City Centre.

- 10.2.3 It is considered that the design features provide appropriate modern detailing. The glazing would be recessed by a minimum of 100mm to create a meaningful reveal to be clad in a black gloss finish ceramic tile, which would give visual interest to the elevations. The window rhythm is intended to give a vertical emphasis, and tie the two elements of the building and their uses together. The use of the different coloured ceramic panel in a different plane, recessed by some 20mm, and in a different sized panel and coursing mimics the window pattern on the office accommodation, unifying the visual appearance of the two elements.
- 10.2.4 The quality of the external materials can be controlled through the provision of material samples panels by condition. 1:50 and 1:20 typical bays and sections have been submitted for each building to establish the detailing of the elevations, and this would be reinforced at working drawing stage by conditions. Full details of mechanical plant would be required by condition in order to control its potential amenity and visual impact.
- 10.2.5 The routes and spaces around the building would also be appropriate to the continuing regeneration of this part of the city centre and in accordance with the Leeds Waterfront Strategy and the UDP Proposal Area Statement. The riverside walkway and pedestrian bridge have been delivered as part of previous permissions for this wider site, and the current proposal provides for connections to the riverside beyond the neighbouring block at No.1 Whitehall Riverside. This application proposal would not prejudice the development of the remainder of the wider site along similar lines to that previously approved.
- 10.2.6 The landscaping of the site would be designed in a positive manner appropriate to the character of the building and the surrounding area, and the character of paving materials would accord with the character of the area. Exact details of hard and soft landscaping, including samples of surfacing materials, would be controlled by condition.

10.3 **Transportation**

- 10.3.1 The site lies within the city centre core parking area, and the parking provision proposed complies with the UDP maximum parking guidelines for the site.
- 10.3.2 To further reduce reliance on the private car the submitted Travel Plan includes the following measures:
- provision of shower facilities to encourage cycle use for hotel and office staff.
 - appropriate secure storage for cyclists and motorcyclists
 - provision of car sharer bays in the basement for office users
 - provision of short stay cycle spaces for visitors
 - improvements to local pedestrian and cycle connectivity through the provision of cycle lane and cycle route signposting
 - provision of a real-time bus display in the hotel reception
 - provision of car club trial for office users
 - Arrangements for the monitoring and take-up of the Travel Plan measures for office and hotel staff and hotel guests, and revising the Travel Plan as necessary.
 - Provision of one car club space on-site
 - Provision of a budget for the promotion of sustainable travel incentives in the event that travel plan targets are not met

10.3.3 The applicant will also be providing a contribution towards strategic public transport improvements in accordance with SPD5.

10.3.5 The development would provide for enhancements to the strategic public transport network, as well as provide improvements to local pedestrian and cycle routes where required to achieve appropriate levels of accessibility. The development would also provide and encourage safe and secure cycle and motorcycle usage/storage, provides a car club space and trial provision, and has an adequate level of car parking within the scheme. It is therefore considered that the application proposal would not raise any specific road safety concerns.

10.4 **Flood Risk**

10.4.1 The proposed development is for office use which are classed as 'less vulnerable' and hotel use, which is classed as 'more vulnerable' under PPS25. The sequential and exceptions tests therefore apply. The applicant has stated that no sequentially preferable sites are available to deliver this project within the Prime Office Quarter, nor the Prestige Development Areas as defined by the UDP. The exceptions test has therefore been applied, and the site is considered sustainable given its location within the Prime Office Quarter of the City Centre accessible to pedestrians and cyclists and close to public transport links, the site is previously developed land, and through the submission of an acceptable flood risk assessment, the proposal would adequately safeguard against potential flooding impact.

The proposal is an appropriate use for the City Centre, in particular within a specific Proposal Area identified within the designated Prime Office Quarter for mixed office and other uses (specifically hotels), and one which under PPS4 should not be located outside a designated centre.

10.5 **Sustainability**

10.5.1 The proposal will meet at least BREEAM Very Good rating, and a planning condition to provide details of the verification of this will be applied. A minimum of 10% energy generation will be developed through on site renewables in the form of air heat source pumps on the hotel, utilising the comfort cool system and utilising the heat generated. CO2 emissions will be reduced by a combination of the introduction of the renewable technology, and enhanced u-value and air tightness values. Low Energy Servicing equipment will be specified throughout with a preference for variable control systems. A green roof would be provided above the office accommodation above fifth floor level. In terms of the hotel, full details of the types of sustainability measures that Premier Inn hotels and restaurants use corporately has been submitted, and this includes food recycling, cooking oil recycling, low water use systems, low energy lighting and heating and air conditioning controls.

10.6 **Section 106 Agreement**

10.6.1 A Section 106 Agreement would be signed in connection with the planning application, with the following obligations:

- Public transport contribution in accordance with SPD5 £97 496
- Car club space and trial provision for office users contribution £2500
- Travel plan monitoring fee in accordance with the Travel Plans SPD £4750
- Public access around the site

- Cooperation with local jobs and skills training initiatives. This would involve making reasonable endeavours to cooperate and work closely with Employment Leeds to develop an employment and training scheme to promote employment opportunities for local people during the construction works, from the start of the tendering process. Reasonable endeavours would also be made to agree a method statement with the future occupiers to identify employment and training opportunities, to provide every six months details of recruitment and retention of local people as employees and training of apprentices, and identify any vacancies on a monthly basis to Employment Leeds.
- Section 106 management fee £1500

10.6.2 As part of Central Government's move to streamlining the planning obligation process it has introduced the Community Infrastructure Levy Regulations 2010. This requires that all matters to be resolved by a Section 106 planning obligation have to pass 3 statutory tests. The relevant tests are set out in regulation 122 of the Regulations and are as follows:

'122(2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is-

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.'

As listed above (and also in the 'recommendation' box at the beginning of this report), there are matters to be covered by a Section 106 agreement. These matters have been considered against the current tests and are considered necessary, directly related to the development and fairly and reasonably related in scale and kind to the development.

11.0 CONCLUSION

11.1 It is considered that the submitted full planning application would result in the re-use of a vacant brownfield site, and support employment through the provision of a office accommodation and visitor facilities in a sustainable location in the City Centre close to the railway station. It is therefore considered that the proposal would contribute positively to the enhancement and regeneration of the Riverside/West End area of the Prime Office Quarter of the City Centre.

Background Papers:

Application files 11/04023/FU, 20/299/00/OT, 20/192/04/FU, 06/04682/FU

Appendix 1

11/04023/FU

25. Prior to the commencement of development, arrangements for the implementation of highways works as identified on approved WYG drawing no. SK011 P1 shall be submitted to and approved in writing by the Local Planning Authority, including:
- a) Directional signage for cyclists
 - b) Realignment of kerb line to accommodate new cycle lane and associated lining/hatching
 - c) Road lining to Whitehall Road opposite site frontage

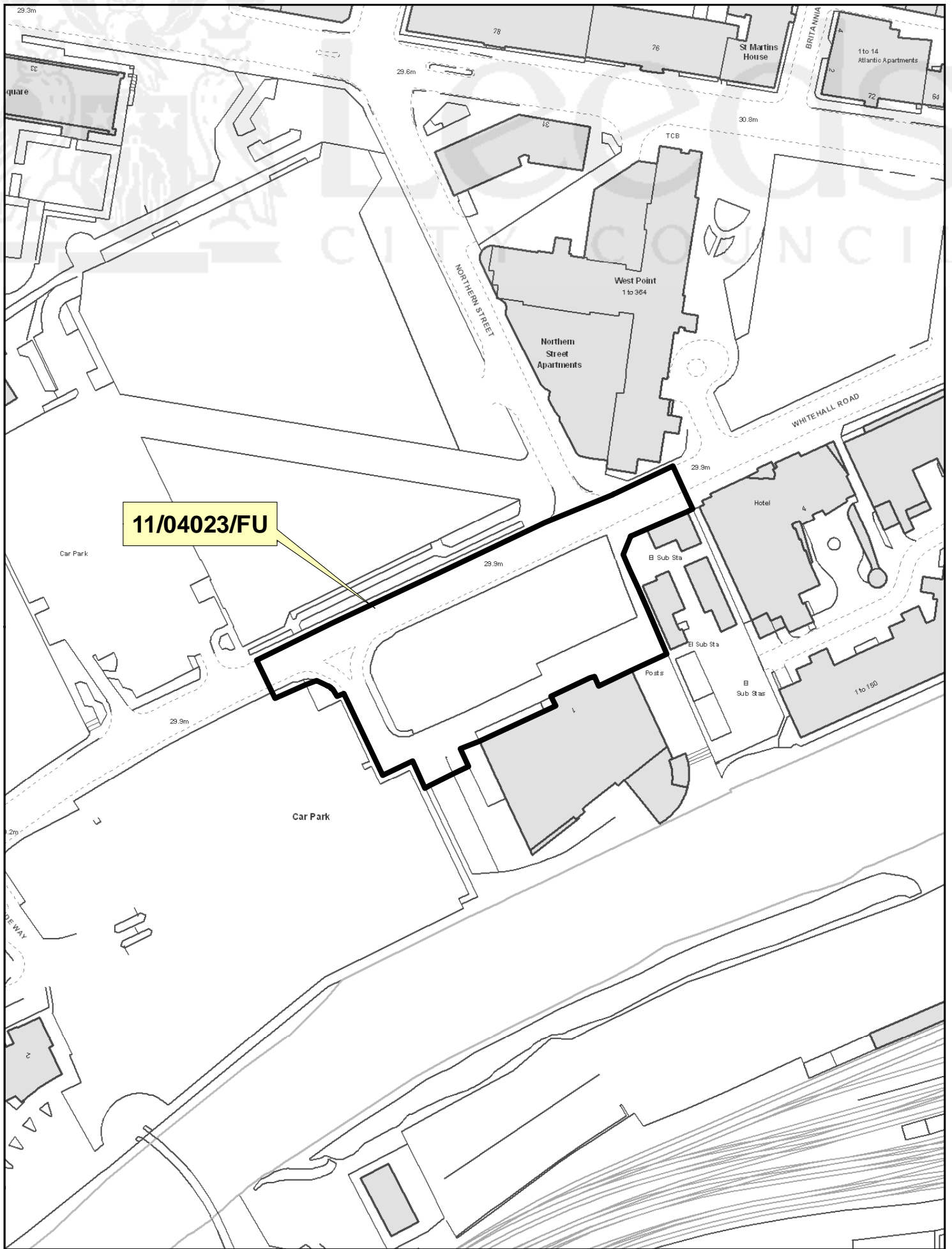
The above works should be implemented prior to first occupation of the development, unless otherwise agreed in writing by the Local Planning Authority.

In the interests of pedestrian and vehicular safety, in order to accord with Leeds UDP Policies T2 and T5

27. The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) dated September 2011 and the following mitigation measures detailed within the FRA:

1. Identification and provision of safe route(s) into and out of the site to an appropriate safe haven.
2. Finished ground floor levels are set no lower than 30.60 m above Ordnance Datum (AOD).
3. The basement access(es) must be set no lower than 29.18m above Ordnance Datum (AOD).

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site, to ensure safe access and egress from and to the site, and to reduce the risk of flooding to the proposed development and future occupants in accordance with PPS25 and Leeds UDP Review 2006 Policy N38B



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