

Report of the Director of City Development

Report to: Development Plan Panel

Date: 11th September 2012

Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation

Responses: City Centre

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| Are specific electoral Wards affected? If relevant, name(s) of Ward(s): | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Are there implications for equality and diversity and cohesion and integration? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Is the decision eligible for Call-In? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. It is not considered that there are any issues significant enough to justify major changes. The analysis and suggested changes are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to the Placemaking chapter and the overall approach to retailing and centres. Appendix 1 attached, summarises the representors, key issues raised, the City Council's view and proposed action.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 Strategic Policy SP3 sets out the role of the city centre in ten points. These cover a wide range of matters including use, character, transport, spaces, flooding etc. Consequently, the public comments received raise a wide range of issues. The main points raised include flood risk, impact of development on the motorway network, re-use of buildings, encouragement of residential use, making the city centre more family friendly, protecting the character and cultural offer of the city centre and acknowledging the potential of Holbeck Urban Village.
- 3.2 Policy CC1 deals with the quantity of development to be planned for in the City Centre and management of the development of town centre uses. The main points raised include:
- Questioning the quantity of retail growth planned for in the city centre

- The prescription of the criteria for applying NPPF sequential and impact tests for different sizes of development inside the city centre but outside of designated retail areas
- Centre designations and boundaries
- Allowances for bulky goods retailing
- Conservation, heritage and the public realm

3.3 Policy CC2 deals with the southern half of the city centre. Public responses have queried the role of Crown Point Retail Park, boundaries and the level of detail of proposals for the area.

3.4 Policy CC3 seeks enhancement to connections both within the city centre and to adjoining neighbourhoods for pedestrians and cyclists. Comments relate to the level of detail provided and to the appropriateness of certain transport strategy ideas set out on Map 11.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

4.4 Resources and value for money

4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

5.1 This report provides an overview of the issues raised about Strategic Policy SP3 and Policies CC1, CC2 and CC3 concerning the planning of Leeds City Centre. None of the issues are considered significant enough to justify any major changes. The remaining issues warrant only minor changes or no changes at all.

6. Recommendations

6.1 Development Plan Panel is requested to:

i). endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

APPENDIX 1: City Centre

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy SP3: Role of the City Centre

| Representors | Issue and Suggested Changes | LCC Opinion | LCC Action |
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| Environment Agency (0046) | Flood risk i) Criterion vi should require a sequential test for flood risk in line with the NPPF. A link with an amended Spatial Policy 1 should address this issue. ii) Criterion (vii) creating open spaces should be viewed as a form of flood mitigation measure, with areas such as the proposed City Centre Park (South Bank) acting as a green-blue open space area that is allowed to flood before the onset of flooding of built up areas. | The testing of development proposals for flood risk in line with the NPPF is required for all development under Core Strategy Policy EN5. This policy also commits the Council to manage and mitigate flood risk by making space for flood water in high flood risk areas. This would apply equally to high flood risk areas in the city centre, including the south bank park, as areas outside of the city centre. There is no need for Policy SP3 to duplicate the role of Policy EN5 | No change |
| Highways Agency (0060) | Whilst office growth in the city centre is supported in principle, insufficient mitigation is proposed to deal with the effects of traffic on the motorway network. Mitigation needs to be considered in the context of local road and other transport infrastructure initiatives. | The city centre is the most accessible part of Leeds MD by public transport and is therefore very sustainable for office development. Leeds City Council is currently working with the Highways Agency and its consultants to assess the impact of the Core Strategy on the Strategic Road Network. This work will provide a more detailed examination of the impacts than has been possible to date. The intention is to reach an agreed position on the impacts and agree appropriate mitigation where necessary. | No change |
| Leeds Civic Trust (0062) | Buildings can contribute to the vitality of the city centre. Criterion iv) should also plan for the re-use of buildings, with encouragement for the positive use of vacant upper floors | Agree. | Minor change. Insert "and buildings" after "sites" in criterion iv of Policy SP3. |
| Leeds Civic Trust (0062) | In clause vii), places and spaces should also aim to be family friendly, and the needs of pedestrians should be put before those of vehicles | Agree that "family friendly" should be added. Priority over vehicles depends on individual site circumstance | Add ", family friendly" after "attractive" in criterion vii of Policy SP3 |
| Leeds Civic Trust (0062) | Existing routes within the city also need attention, as well as connections to adjoining neighbourhoods. Traffic dominates some parts of the centre. Re-write criterion viii): "improving | Covered in more detail by Policy CC3 | No change |

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| | connections (particularly pedestrian and cycling connections) within the City Centre (including city centre south) and between the City Centre and adjoining neighbourhoods.” | | |
| English Heritage (0099) | The distinct identity of Leeds City centre is a key contributory factor in its attractiveness and all other actions set out in this Policy need to be balanced against it. Insert an additional criterion: "Safeguarding and reinforcing those elements which contribute towards the distinct identity of the City Centre” | Use of Policies P10 and P11 in combination with the recognition of the distinct character set out in paras 5.1.11 – 13 as well as Character Area and Conservation Area statements should be sufficient to safeguard and reinforce the identity of the city centre. Policies P10 and P11 are proposed to be strengthened in the first Proposed Changes. | No change |
| WYG (0420) | The supporting text in paragraphs 4.3 and Policy SP3 fail to give enough emphasis to the role of the city centre in delivering 10,200 dwellings during the plan period | Objective i) of the Spatial Vision clarifies that there is a place for residential development. Policy SP7 sets the housing distribution including 10,200 dwellings for the city centre. No need to duplicate in Policy SP3 | No change |
| WYG (0420) | Para 4.3.3 should mention the development potential of Holbeck Urban Village | Agree | Minor change. Insert text to para 4.3.3 after "...City Centre park." To state: "Holbeck Urban Village in the south west of the City Centre offers opportunity for significant development of a scale compatible with its historic street pattern and buildings." |
| WYG (0420) | Policy SP3 is not aspirational enough. The policy should recognise the need for the City to attract inward investment and deliver infrastructure to support the Vision for Leeds to be the 'Best City in the UK by 2030 | The supporting text explains that Leeds is aspirational about the city centre. | No change |
| (0420) WYG | Make the retail offer more robust. Consideration should be given to comparison goods retailing being introduced into mixed use regeneration schemes in order to introduce vitality and distinctiveness. | Dealt with under Policy CC2 | No change |
| Harrow Estates via WYG (0420), Taylor Woodrow, Mirfield, Keyland, Chatford, Taylor Wimpey, Kebbell, Warner, Redrow, Miller, Barrett Leeds, | Criterion (x) to broaden the housing offer with more family housing will be frustrated by a lack of sites to meet this aspiration in the required quantities and lack of clarity on how necessary supporting infrastructure will be delivered. Policy cannot be effective, therefore unsound. | A large number of deliverable and developable sites are available for housing development as demonstrated by Leeds' Strategic Housing Land Availability Assessment. Paragraph 5.1.17 of the Core Strategy Publication Draft explains the means for delivering the range of supporting services. | No change |

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| Barrett York via Dacre Son & Hartley (0480). T Emsley via ID Planning (1186) E Thornhill, R Ogden, Consortia of house-builders, ELE NQ Consortia, Barrett DWH GND, GND Ltd and Evans, Redrow Homes and Wortlea Estates via ID Planning (5671) Redrow Homes Yorkshire (1938), Barratt Homes and DWH (5895) | | | |
| The Theatres Trust (2029) | <p>Whilst the plan promotes the cultural offer of the city centre, Spatial Policy 3 (i) and Policy CC1 c) provide insufficient protection of existing facilities to maintain this vibrancy.</p> <p>Amend criterion iii, adding a sentence EXISTING FACILITIES WILL BE PROTECTED AND ENHANCED AND THEIR LOSS RESISTED UNLESS DEMAND CAN BE MET FROM ALTERNATIVE PROVISION IN THE CITY CENTRE OR EDGE OF, OR THERE IS NO DEMAND FOR SUCH FACILITIES AND NO OTHER COMMUNITY OR CULTURAL SERVICE CAN MAKE USE OF SUCH FACILITIES.</p> | <p>Policy CC1 criterion c) says "...cultural facilities to be retained in the city centre". The last sentences of para 5.1.16 explain that because cultural facilities generate large footfall and trips they should be retained in the city centre; other new development must therefore be planned to sustain rather than undermine major cultural facilities; exceptions may be made to help retain historic buildings or where floorspace will be replaced.</p> <p>This is as strong as the text suggested for retaining existing cultural facilities.</p> | No change |
| Mr Cedric Wilks (4783) | The modern shopping centres of the city centre should be replaced with Victorian frontages, as far as financial resources allow | Victorian frontages will not always be appropriate in individual street contexts | No change |
| Mr Cedric Wilks (4783) | More and cheaper parking and "park and ride" should be made available to attract visits to the city centre | This is dealt with adequately in Policy T1 | No change |
| Mr Cedric Wilks (4783) | The city centre should be kept cleaner to help attract visits to the city centre | Beyond the scope of the Core Strategy | No change |

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| Hammersons via Barton Willmore (4816) | SP3 should make specific reference to the Eastgate and Harewood Quarter redevelopment as it is a key part of the vision for enhancing the city centre. | Not necessary to be so site specific in this strategic policy. The Eastgate proposal is mentioned already in the Profile of Leeds (para 2.11), Spatial Vision (para 3.2), City and Town Centres (4.2.4), Shopping in the City Centre (5.1.6-7), Policy CC1 and Policy CC2 | No change |
| ASDA via Osborne Clark (5889) | The city centre's role for major retail should not preclude the development of retail development outside of the City Centre where facilities can cater for specific needs and meet the requirements of the NPPF | SP3 does not preclude this | No change |

Core Strategy Publication Draft - Analysis of Consultation Responses

Policies CC1, CC2 and CC3: City Centre

| Representors | Issue and Suggested Changes | LCC Opinion | LCC Action |
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| Policy CC1: City Centre Development | | | |
| | Retail Growth in the City Centre | | |
| RED Property Services (5719) for Scarborough Development Group | <p>Retail Study concluded there was a need for a large amount of additional retail comparison floorspace across district. CS does not specify district wide needs, instead only suggesting 31k additional for City Centre. Therefore, does not satisfy NPPF para 23 which says 'It is important that needs for retail, leisure, office and other main town centre uses are met in full'.</p> <p>CS should seek to plan for the retail needs that have been identified for the Leeds district as a whole rather than focus too narrowly on the City Centre.</p> | <p>The NPPF sets out that plans should be justified: "the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence." The Leeds Centres Study shows there is wider need for comparison space, particularly in the White Rose area as result of overtrading, but particularly in the first 5 years there needs to be the opportunity for Trinity and Eastgate (and Trinity Wakefield) to be successful and for the City Centre to readjust to this floorspace. This is therefore consistent with all the NPPF principles. As with all major schemes, they will cause internal trading effects and there will be readjustments, as has occurred over the past few decades. Additionally the Eastgate and the Harewood Quarter is a major commitment, and its delivery must be a priority due to its significant physical and economic regeneration benefits. This could bring forward other redevelopment opportunities within or closely related to the Prime Shopping Area. A further retail study will be necessary before any further addition to the floorspace.</p> <p>Experian assumptions and other data sources since the Study was published have decreased growth forecasts, and increased forecasts for online shopping. Retail trading is probably at its most uncertain in the modern era. Future 'capacity' based on trend projections can only be subject to similar uncertainty. Alongside the ongoing recession this</p> | <p>Minor change. Replace "all" with "the vast majority" in line 4 of para 5.1.7</p> |
| ASDA via Osborne Clark (5889) | <p>The city centre's role for major retail should not preclude the development of retail development outside of the City Centre where facilities can cater for specific needs and meet the requirements of the NPPF</p> | | |

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| | | <p>means that it is necessary to take a cautionary approach to providing the full level of floorspace identified in the Study. An updated study once the impact of Trinity and Eastgate has been established is the appropriate mechanism to identify how much further floorspace would be required in the longer term. The Site Allocations DPD will also consider opportunities within and on the edge of centres including opportunities to change boundaries. As the main City Centre commitments are delivered and begin to trade, medium and longer term prospects will become clearer. Major schemes are being brought forward and the context established to address longer term needs, therefore it is considered that the approach is justified and in broad terms provides significant flexibility for the LDF to bring forward development of an appropriate scale and location as evidence becomes more certain. It is concluded the approach is sound in the context of NPPF para 182 when read in its entirety.</p> <p>As stated in para 5.1.7, the plan is to expect the city centre to accommodate major shopping provision to meet Leeds' needs for additional comparison shopping provision. The use of the word "all" is considered too absolute when Town Centre schemes may be possible.</p> | |
| <p>Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806)</p> | <p>The plan creates uncertainty on how comparison retail floorspace growth will be accommodated. By planning for 31,000sqm of growth as a long term matter, creates uncertainty for the short and medium periods. This will hamper Crown Point Retail Park's (CPRP) ability to attract occupiers and compete with unrestricted out-of-centre retail parks. The Core Strategy needs to identify locations to accommodate strategic development needs now. Given the recognition of the CPRP's current complementary role, this should be formally recognised now in conjunction with the proper planning of the wider South Bank Area. Without properly outlining what will be delivered and where, the plan will not be "effective" and not be "sound".</p> | <p>The Centres study (Colliers 2011) concludes that it is not necessary – at this stage – to consider any further growth of the city centre shopping area (para 10.10). The Trinity and Eastgate Schemes will suffice for the short-medium term, save for some re-modelling of existing city centre shopping centres.</p> <p>The CS policies give scope to consider in a relatively short term the relationship between CPRP and the southern half of the city centre.</p> <p>However, if the CS called for subsequent DPDs to identify locations and sites to accommodate trend projected growth over the entire plan period it is a</p> | <p>No change.</p> |
| <p>Morley Town Council</p> | <p>We support the aim of preserving the primacy of the city</p> | | |

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| (4825) | centre. One of the attractions of the city centre is its compactness; it would be a mistake to expand it beyond reasonable walkability. | significant risk that owner/developer aspirations could result in significant “planning blight”. It is concluded that the CS approach to planning for retail growth in the city centre is sound in the context of NPPF paragraph 182 when read in its entirety. | |
| Osborne Clarke (5889) for ASDA | Policy CC1 ASDA support the approach to the location of development in the City Centre. The focus of development within the City Centre will increase investment and help to maintain the City as a regional focus for development. | Detailed matters of what will be delivered and where would be best handled in a site allocations document rather than the CS. | |
| Montagu Evans (5723) for Threadneedle | Part (ii) of the policy implies that 31,000 sq m of net additional retail space (comparison) will be allowed following completion of the Trinity and Eastgate schemes. If development is within the PSQ, no need to reassess need. Replace words 'FOLLOWING COMPLETION OF' with 'TO'. | Does not make sense to replace “following completion of” with “to”. The need for 31,000sqm already takes into account the additional floorspace being provided by Trinity and Eastgate | No change |
| Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806) | Para 5.1.7 sets a policy approach that would preclude any development beyond the PSQ until all vacant floorspace has been absorbed. This is contrary to the NPPF. It has been a longstanding principle that vacant floorspace is an accepted and expected component of the make-up of any town or city centre arising from natural ‘churn’ of retailers and providing scope. Therefore, each proposal needs to be assessed having regard to its individual merits. | In the context of para 5.1.7 the type of vacancy referred to is that which is caused as a consequence of the opening of major new schemes such as the Trinity and Eastgate shopping centres. This would be vacancy above that expected from natural “churn”. As such, it would provide sequentially preferable alternatives to be considered in edge/out of centre retail proposals | No change |
| The Victorian Society (3059) | 5.1.7 states “...Once the Trinity and Eastgate retail developments have [been] completed it is probable that some retail operators will vacate floorspace elsewhere in the PSQ...” This is of great concern, and we urge the inclusion of specific measures to protect the existing and historic parts of the PSQ from damaging vacancy and neglect. | The intention of the planned approach set out in para 5.1.7 is to avoid premature approval of further major retail developments that could exacerbate or prolong higher than normal vacancy rates in the city centre. | No change |
| WYG (0420) | Policy CC1 point iv is not clear at what supporting services actually means. | It is explained in para 5.1.17 | No change |
| | Criteria d), e) and f) of Policy CC1 | | |
| Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806) | The principle of locally set thresholds for sequentially testing such proposals is seen as a reasonable approach, although the thresholds themselves are (i) arbitrary, (ii) unnecessarily complex, and (iii) more onerous than those applied outside of the City Centre which is illogical. Each proposal will have | Complexity does not make policy unsound. The thresholds are designed to remove certain sizes of development from the sequential and impact tests. This is positive planning. | No change |

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| | different implications, depending on the particular characteristics of the scheme, and it is not effective to apply such a prescriptive set of standard thresholds in the manner currently drafted – the approach needs to be simplified. | 1500sqm is a reasonable threshold for impact assessment. The NPPF makes it clear that there can be locally set thresholds. This threshold relates to current and continuing Leeds development management experience of supermarket and superstore proposals. | |
| WYG (0420) | Policy CC1e is overly prescriptive as is and may not enable successful regeneration and successful residential schemes. | | |
| DPP (5543) | <p>Parts e) ii, iii, iv of Policy CC1 are unduly prescriptive and detailed. Paragraph 24 of the NPPF is quite clear in the application of the sequential approach and this has not fundamentally changed from that contained within PPS4, i.e. in centre, followed by edge, followed by out of centre sites which are accessible and well related to the centre. There is no justification for complicating the sequential approach in the way that Policy CC1 seeks to. It's prescription and inflexibility are contrary to para 182 of the NPPF.</p> <p>A far simpler approach would be for criterion e) of the Policy to be more akin to criterion d) which deals with comparison retailing. Within the City Centre the sequential test for convenience retailing should include the Primary Shopping Quarter.</p> | | |
| DPP (5543) | Object to convenience retailing that is above 1500 sq m gross requiring an impact assessment and consider that this threshold is not locationally proportionate and should be reduced. | | |
| Montagu Evans (5723) for Threadneedle | <p>CC1: Clauses (i) (ii) and (e)(iv) should be clarified as to which floorspace measure is used (i.e. gross external area/gross internal area/net sales) as '(gross)' is referred to in (e)(i) - (iii).</p> <p>In (e) (i) - (iii) there should be clarification whether this is a GEA or GIA figure</p> | Agree. Clarification will help prevent misunderstanding. Clarify that all measures in CC1 are Gross Internal Areas | <p>Minor Change. In criterion e) delete "(gross)" from i), ii) and iii). After f) add "Nb All thresholds are for Gross Internal Area"</p> <p>For further clarity, revise overlapping thresholds in part e) to "201-372" and "373 – 1,499"</p> <p>For further clarity, define "convenience facilities"</p> |

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| | | | in the Glossary |
| DPP (5543) | Support clause e) i) allowing convenience retailing below 200 sqm gross anywhere in the city centre. Small scale local shopping provision performs an important role for residential and business communities and accords with both the economic and social roles of sustainable development. | Support welcomed | |
| DPP (5543) | We have a particular concern in relation to the requirement for the sequential search to incorporate a '5 minute inbound off peak drive time'. This is simply unrealistic and unworkable. | It is necessary to provide a general benchmark for the distance from the proposed development to search for sequentially preferable sites and buildings. A 5 minute drive time is considered appropriate for development of 372sqm or more in the city centre | No change |
| Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806) | The final paragraph of Policy CC1 part e) says proposals will be resisted where convenience proposals would be "harmful". Paragraph 27 of the NPPF states that that proposals should only be refused on 'impact' grounds where there will be a 'significant adverse impact'. The Policy should be revised to reflect the NPPF definition. | Agree | Replace "harmful" with "significantly adverse" in part e) of Policy CC1 |
| Barton Willmore (4816) for Hammerson UK Properties Ltd | Hammerson is concerned that criteria d. and e. could support future edge and out-of-centre retail development which could impact upon the delivery of the EHQ scheme. Such support is premature given that Policy CC1 acknowledges the need for a further retail study to assess future need. As currently worded Policy CC1 does not comply with the aims of the NPPF (para 23) or Policies SP1, 2, 3, 8 and 9 which direct development to the City Centre in the first instance. CC1 should be amended to explicitly support the 'City Centre first' approach and the requirement for sequential and impact assessments for edge and out-of-centre schemes, in accordance with the NPPF (paras 24 – 27) and the thresholds identified in Policy P8. | Criterion d) provides a strong preference for comparison floorspace to be located in the PSQ. To remove any doubt, add text about compliance with NPPF tests. The national threshold of 2,500sqm would apply for impact testing of comparison floorspace in the City Centre as this is the highest level of the centres hierarchy. Criteria under e) are designed to loosen the restrictions of the NPPF sequential test for small scale convenience shops and services within the city centre. This is necessary to allow provision of corner shops to serve new development and to help promote the vitality of existing parades (to be renamed "local centres"). It is not considered that limited acceptance of additional small scale convenience provision – outside of the NPPF sequential test – would impact upon the delivery of the Eastgate scheme. | At the end of criterion d) of Policy CC1 add "This will be according to NPPF sequential testing, and, in the case of proposals of 2,500sqm or more according to NPPF impact testing." |
| Jenny Fisher Chamber of Commerce Sub-Group | Part iv) add "...and improvements to the public realm | Agreed at Development Plans Panel as a consequence of changes to Policy P10 | Part iv) add "...and improvements to the public realm" |
| | | The City Council considers a minor change necessary to offer greater scope for A2 – A5 uses to be supported in principle in city centre locations where | Add to the end of e) ii) "...or if the proposal is not complementary to |

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| | | these uses can be complementary to particular functions of the city centre, such as office areas or leisure and entertainment areas along the riverside. | the function of office areas or entertainment or cultural destinations, including the waterfront” |
| | Centre Designations and Boundaries | | |
| DPP (5543) | The Policy is based around references to the Prime Shopping Quarter and designated parades and yet there is no clear definition of either. The Colliers CI Retail Study, at paragraph 4.11, defines the area but we can see no such reference within the Core Strategy and for purposes of clarity the area should be defined in diagrammatic form. | The PSQ is defined in the UDP. The Site Allocations DPD will review the PSQ boundary. | No change |
| DPP (5543) | ‘Designated’ parades are also only referred to in text form at paragraph 5.1.10 of the Core Strategy. Notwithstanding this we consider, in any event, that a sequential test to include neighbourhood parades is incorrect and inconsistent with the NPPF Annex 2 of which defines town centres as applying to ‘city centres, town centres, district centres and local centres but excludes small parades of shops of purely neighbourhood significance’. | The term parade is intended to mean local centre. The need for convenience facilities in the southern half of the city centre to support the growth of residential and working populations was recognised in the City Centre Area Action Plan Preferred Options. It is recognised in para 5.1.10 which also accepts the need for new shopping parades. | Revise para 5.1.10 to replace “shopping parades” with “Local Convenience Centres” and list the named locations as bullet points with an additional bullet point to state “Further Local Convenience Centres may be identified in response to new evidence or new development” Revise Policy CC1 e) ii), iii), iv) and final paragraph to replace “designated parades” with “Local Convenience Centres”. Add “(New Dock)” after Clarence Dock. Update Map 10 to illustrate the centres. |
| WYG (0420) | Whilst the need to deliver convenience goods retailing outside the PSQ to support a growing residential population is reflected in CC1, there is need for a further major convenience good store in the south of the city centre. This should well linked to the public transport network and pedestrian links and in a location which will encourage regeneration. As such, para 5.1.10 should enable more flexibility for more extensive convenience good retailing subject to normal retail tests. | | |
| Montagu Evans (5723) for Threadneedle | 5.1.7 and 5.1.8 Support the updating of retail frontages as a matter of priority because it affects the Core Shopping Centre | Support Welcomed | No change |
| Montagu Evans (5723) for Threadneedle | In terms of part (f), relies on up to date definition of primary and secondary shopping frontages. The frontage plan relating to The Core shopping centre on The Headrow is out of date showing the layout of the now redeveloped Headrow Shopping Centre. In light of this discrepancy there need to | This matter will be addressed in the Site Allocations DPD. Policy CC1 Part “f” does not need to refer to the prospect of change in designation of frontages. | No change |

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| | <p>be:</p> <p>a) an explicit exception for The Core; or</p> <p>b) supplementary wording of 'unless the Primary Frontages and Secondary Frontages have been superseded'.</p> | Whatever frontages are added, withdrawn or modified, policy will apply accordingly | |
| | Bulky Goods Retail Area Designations | | |
| Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806) | Lack of clarity regarding what areas are designated for bulky goods retailing. | The UDP designates two areas of the City Centre for retail warehousing which were designed for bulky goods retail operators. The Site Allocations DPD will examine whether and where new areas might be designated. The Core Strategy acknowledges that the CPRP function has changed away from bulky goods (5.1.7); it will be the role of the Site Allocations DPD to re-designate it. | No change |
| Aviva Life & Pensions (UK), and The Crown Estate via Indigo Planning (0806) | The designation of the CPRP as a 'bulky goods' retail warehouse park location does not reflect the prevailing planning status of the majority of units at the CPRP with only 3 of 20 subject to such controls, the remainder being able to sell an unfettered range of non-food (plus an allowance of food) goods. Treating CPRP as a bulky goods location that should only accommodate bulky goods retailers is objectionable. | | |
| | Residential Use | | |
| Leeds Civic Trust (0062) | We support the statement in para 5.1.14 that a wider variety of house sizes and types should be created to accommodate families wishing to live in the city centre. We support the criteria in the policy for mixed use with residential use of upper floors. CC1 Criteria b) should include the promotion of residential use of existing as well as proposed upper floors. | Support for residential development in the city centre is welcomed. | Replace criterion b) with the following: "Encourage residential development including new buildings and changes of use of existing providing that it does not prejudice the town centre functions of the city centre and that it provides a reasonable level of amenity for occupiers" |
| Leeds Civic Trust (0062) | There is a large amount of vacant space on existing upper floors, much of it in historic buildings where residential use should also be encouraged. | Agree that residential development in the city centre should be encouraged in line with bullet point 9 of paragraph 23 of the NPPF, and should be encouraged in both new development and changes of use, subject to considerations of residential amenity and the need to avoid prejudicing the prime function of the city centre to host town centre uses. | |
| WYG (0420) | No detailed assessment as to the ability to deliver 10,200 dwellings. | The SHLAA provides evidence of ability to deliver 10,200 dwellings | No change |
| WYG (0420) | We support the recognition of the need to support the growing residential community in terms of services such as Gps, nurseries, etc as at para 5.1.3 | Support welcomed | No change |
| Barton Willmore (0057) on behalf of Templegate | Paragraph 5.1.15 states that there should be higher standards of sustainability in dwellings within the Aire Valley Eco Settlement. This aspiration needs to be considered within the overall viability of this project, including | LCC maintains an aspiration that the standards of sustainability in dwellings within the Aire Valley Eco Settlement should be higher than normal, and this should certainly be achievable in the vicinity of the | Minor change. Add the following text to the end of para 5.1.15, "...providing that |

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| | contributions towards public transport infrastructure and affordable housing. Also much of the AV land suffers from significant abnormal costs Paragraph 5.1.15 should be deleted. | planned combined heat and power unit. But LCC acknowledges that the cost of achieving higher standards on the viability of development must be taken into account. | development remains viable”. |
| | Conservation, Heritage and the Public Realm | | |
| Leeds Civic Trust (0062) English Heritage (0099) | We support the recognition in para 5.1.13 that a character appraisal of the city centre needs to be carried out to review Conservation Area boundaries. | Support welcomed | No change |
| Leeds Civic Trust (0062) | The policy itself makes no mention of the importance of heritage in the city centre. A statement on proposals for Conservation Area Appraisals is required in policy CC1 | The importance is recognised in paragraphs 5.1.11-13. Policy control is provided through policies P10 and P11 | No change |
| Leeds Civic Trust (0062) | There is no mention of the role of development in improving the public realm in the city centre. Although Policy P10 may be the place to expand on this, the importance of the city centre warrants its inclusion in this policy. The public realm is the most visible and most used part of the city and this policy should spell out clearly that the aim of achieving the soubriquet of “best city in the UK” requires a public realm which is second-to-none in its quality of design, its distinctiveness, its sense of place and its attractiveness to users. Include In the policy that any development taking place in the city centre must not only maintain and enhance of the quality of the public realm around it but must also be expected to make a contribution to its enhancement. | Improvement to the city centre public realm is dealt with by Policy CC3, as well as Policy P10. | No change |
| The Victorian Society (3059) | 5.1.1 We strongly support the reference to “...the distinctive historic core...” It is on this that so much of Leeds’s distinctive and successful character depends. | Support welcomed | No change |
| | Miscellaneous | | |
| Montagu Evans (5723) for Threadneedle | 5.1.6 The “Core Shopping Centre” should be mentioned as one of the enhanced schemes | Mention of the recent refurbishment of the Core Shopping Centre is not of strategic significance | No change |
| Policy CC2: City Centre South | | | |
| Leeds Civic Trust (0062) | COMMENT Support identification of city centre south as an area of substantial development opportunity. The policy could go further in encouraging a mixed community in the area which would include family housing and the provision of facilities which would enable such a community to be sustained.. | The proposed text would duplicate policy commitment already provided in Policy SP3 (x) for a broader housing mix (including family housing) and in Policy CC1 (iv) for supporting services and open spaces | No change |

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| | <p>SUGGESTED CHANGE Amend the phrase "...substantial opportunity for residential development." to "...substantial opportunity for development which would result in a mixed neighbourhood which would include family housing and the provision of facilities which would enable the resulting community to be sustained."</p> | | |
| Leeds Civic Trust (0062) | <p>COMMENT The city centre boundary has no logical boundary along Leathley Road and by the river it follows no topographical feature. Development on both sides of the existing boundary are of a similar type and extending the boundary will allow a more comprehensive approach to the future of City Centre South.</p> <p>SUGGESTED CHANGE The boundary of the city centre should be extended to the recently completed ring road.</p> | The Site Allocations DPD will be the place to examine any boundary changes needed to create a more logical fit. | No change |
| WYG Planning (0420) | The policy for the southern half of the CC needs to be assessed in greater detail. Concern that this policy and reference to City Centre connectivity in CC3 and Diagram 6 are insufficient to provide a robust and deliverable strategy for the CC and that the need for quality of delivery required for schemes in the CC is not defined clearly. | The Core Strategy is not the place for detailed locational strategy. | No change |
| Indigo Planning (0806) for Aviva Life & Pensions (UK), and The Crown Estate | <p>Support the recognition of the potential future role that CPRP could play within the City Centre, but object to the uncertainty around how and when this will be applied. A simple, NPPF compliant approach to assessing proposals outside of the PSQ (on their respective merits against the sequential and impact tests) would be more appropriate, with areas such as the PSQ and CPRP confirmed as having sequential preference to other locations.</p> <p>To place an effective moratorium on any retail development within the City Centre until completion of the Eastgate development runs contrary to national policy and is unsound on this basis. NPPF only developments exceeding 2,500 sqm should be subject to testing against their implications for implementation of the Eastgate development, and even then there would have to be a 'significant adverse impact' on the investment to justify refusal – this will clearly not apply to many proposals that could come forward within the City Centre, and certainly not at the CPRP.</p> | The retail study concludes that it is not necessary – at this stage – to consider any further growth of the city centre shopping area (para 10.10). The Trinity and Eastgate Schemes will suffice for the short-medium term, save for some re-modelling of existing city centre shopping centres. | No change |

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| West Properties Ltd | <p>The Kirkstall Road Renaissance Area is defined in a document published by Leeds City Council. The area is characterised by a mix of retail, hotel, commercial and sui generis uses together with a number of brownfield regeneration opportunities which should be identified for redevelopment. The area shares similar characteristics of use and physical form to Leeds City Centre.</p> <p>The area benefits from good public transport accessibility enhanced by the Quality Bus Initiative for this part of the A65 Kirkstall Road</p> <p>SUGGESTED CHANGES Include the area within the boundary of Leeds City Centre highlighting the brownfield redevelopment potential of the area in a highly accessible location.</p> | The boundary of the City Centre is provided through the UDP Proposals Map. This may be modified by the Site Allocations DPD but not by the Core Strategy. In any case, there is no evidence that the city centre boundary needs to be extended to accommodate town centre uses. City centre south provides significant opportunity for city centre growth and, with its central location, is sequentially preferable. Nevertheless, Policy EC2 is flexible in allowing office development in edge of centre locations. | No change |
| WYG Planning (0420) on behalf of Muse Developments | Yes (support?) | Support welcomed | No change |
| Policy CC3: Improving Connectivity between the city centre and neighbouring communities | | | |
| WYG (0420) | City Centre connectivity in CC3 and Diagram 6 require greater detail to provide a robust and deliverable strategy for the CC. | Not appropriate for the Core Strategy to provide greater detail. | No change |
| WYG (0420) | Proposals for secondary access route across the southern part of the city along whitehall road and jack lane/nineveh road as shown on map 11 are supported as mechanisms to reduce traffic through Holbeck Urban Village. | Support Noted | No change |
| WYG (0420) for Muse | Support | Support Noted | No change |
| Montpellier Estates (1780) | Support the Proposed Secondary Access Routes across the southern part of the city along Jack Lane/Nineveh Road and Water Lane to Whitehall Road. In addition we would like to see a similar Secondary Access Route proposed around the back of Pottery Field as marked up on the annotated Map 11 [see map in representation folder]. This would have the benefit of bringing Crown Point retail park 'into the city' for pedestrians by reducing traffic on Hunslet Lane. Also this could pave the way for a reduction of traffic along Crown Point Road bringing development at Yorkshire Chemicals and Tetleys 'into the city'. Better access around the back of Crown Point retail park would provide additional | <p>The city centre transport strategy is work in progress. A new Map 11 to illustrate the latest thinking on the emerging city centre transport strategy was agreed by Development Plan Panel 2/7/12. It provides a 'representative illustration of emerging city centre transport strategy' including a proposed enhanced route around the south of Crown Point Retail Park</p> <p>No detailed work has been done on the line of circulation routes, so there is no guarantee that the proposal as shown will be adopted.</p> | No change |

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| | opportunities for regeneration and development in this part of the city centre over the longer term. This reflects emerging work from Leeds City Council Highways where the 'Southern Loop System' is illustrated on the Leeds City Council slide, "City Centre – Transport Strategy Phase B" (attached).. | | |
| Metro | Map 11 has recently been updated. The updated map needs to be included in the document. | An updated Map 11 was agreed by Development Plan Panel 2/7/12. This set out the latest transport route and infrastructure priorities agreed with Metro and other partners. It is in a schematic form and is labelled as "emerging". | No change |
| Montpellier Estates (1780) | The proposed River Aire crossing between Criterion Place and the proposed City Park should be marked on Map 11. This is to acknowledge the proposals in the South Bank Planning Statement and Criterion Place Development Brief | Too detailed for the Core Strategy | No change |
| Gareth Brown (3410) | Vicar Lane outside of the market should be pedestrianized to create a new public square emulating the success of previous pedestrianisation schemes. It would reconnect the Markets to the City Centre, increase footfall and bring Clarence Dock closer to the pedestrianised core. | Too detailed for the Core Strategy. This could be addressed through future non-statutory plans and strategies for the City Centre. Within such context Policy CC3 could be used to help ensure that new development makes appropriate contributions to improve routes, such as pedestrianisation | No change |
| Gareth Brown (3410) | The proposed new Public Transport Box will still run in front of the market, I feel this is a mistake | An amended version of Map 11, which illustrates the emerging city centre transport strategy, was agreed by Development Plan Panel 2/7/12. The map still shows the Public Transport Box running along Vicar Lane in front of Kirkgate Market, but the map is in a schematic form and is labelled as "emerging". This means that the Core Strategy, whilst embodying the concept of the Public Transport Box, offers flexibility for the emerging City Transport Strategy itself or other more detailed plans and strategies to vary the exact designation on the ground. | No change |
| North Yorkshire County Council (5942) | Support Policy CC3, | Support Noted | No change |
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Appendix 2

4.3 Leeds City Centre

- 4.3.1 Leeds City Centre is at the top of the Centres Hierarchy and is the major financial and commercial centre and 'shop window' for the rest of the city and region. As such, one of the objectives of the Core Strategy is for the City Centre to remain a 'successful regional facility'. As the centre of the City Region and district's public transport network, the City Centre is a sustainable employment, shopping, leisure and cultural location, which can promote development that is less reliant on people travelling by car.
- 4.3.2 The City Centre's environmental quality is vital to its economic success and making it a better place to live in, work in and visit. Every opportunity will be taken to enhance streets and spaces in the City Centre, including provision of a major new park. The City Centre will also need to be able to adapt to effects of climate change. One important measure in this respect will be the Leeds Flood Alleviation Scheme, which will help to protect areas at risk of flooding particularly in the south of the City Centre.
- 4.3.3 Whilst the City Centre has seen substantial new development over the last decade, there remain significant parcels of vacant and underused brownfield land available, particularly to the south of the river (The South Bank - linked to the development of a potential urban eco settlement, connecting to Aire Valley Leeds), to the east of Marsh Lane and along the Wellington Street and Whitehall Road corridors to the west. These areas have great potential to accommodate large scale commercial and mixed use development over the plan period along with a City Centre park. *Holbeck Urban Village in the south west of the City Centre offers opportunity for significant development of a scale compatible with its historic street pattern and buildings.* Improving transport links between the City Centre, its surrounding communities, the rest of the City Region and beyond is vital if the economy of the City Centre is to flourish.

SPATIAL POLICY 3: ROLE OF LEEDS CITY CENTRE

The importance of the City Centre as an economic driver for the District and City Region will be maintained and enhanced by:

- (i) Promoting the City Centre's role as the regional capital for major new retail, leisure, hotel, culture and office development;
- (ii) Making the City Centre the main focus for office development in the District (focussed upon the West End, South Bank & Holbeck Urban Village);
- (iii) Valuing the contributions to the life, vitality and economy of the City Centre made by the Universities, Leeds General Infirmary, Major Museums and Arena
- (iv) Comprehensively planning the redevelopment and re-use of vacant and under-used sites *and buildings* for mixed use development and new areas of public space (including a major City Centre Park in the South Bank Area);
- (v) Improving public transport links between the City Centre and the rest of the District, including Leeds Bradford International Airport;

- (vi) Managing flood risk issues comprehensively through supporting the construction of the Leeds Flood Alleviation Scheme and use of other flood mitigation measures;
- (vii) Enhancing streets and creating a network of open and green spaces to make the City Centre more attractive, *family friendly* and easier for people to use and in consolidating and enhancing sense of place;
- (viii) Improving connections between the City Centre and adjoining neighbourhoods;
- (ix) Support the role of Leeds City Station, enhancing Leeds' role as a regional transport hub and supporting the potential for the integration of high speed rail;
- (x) Expanding city living with a broader housing mix (including family housing).

5.1 CITY CENTRE

- 5.1.1 Leeds City Centre performs a key economic, strategic and cultural role at the heart of the Metropolitan District and the City Region. The City Centre is the focus for major employment and job growth, a hub for major transport infrastructure, a premier destination for retail development and a range of commercial activity (including a portfolio of major office locations) and the prestigious location for major cultural facilities (including Europe's first purpose built, super theatre arena). A key strength of the City Centre also is the distinctive historic core, high quality public realm and the delivery of iconic architecture and urban design solutions. These factors combine to present the City Centre as a major opportunity for longer term growth and enhancement.
- 5.1.2 In reflecting the aspiration for Leeds to be the 'best city in the UK', as set out in the Vision for Leeds (including special recognition of the City Centre), the Core Strategy sets out an overall vision, strategy and policy approach. As a basis to facilitate the longer term vitality and viability of the City Centre, this provides the context for longer term growth and economic development, whilst seeking to maintain and enhance its unique and distinctive character. The south eastern quadrant of the City Centre falls within the boundary of the Aire Valley Area Action Plan, for which specific policies are being concurrently brought forward.
- 5.1.3 In addition to its economic and commercial role, the City Centre is also home to an established and developing residential population. This serves to diversify and enhance its role and reduce the need to travel to work, without prejudicing the primary role for town centre uses. It is recognised that the City Centre environment will need to be planned to support the needs of a growing residential community in terms of open spaces suitable for recreation and supporting services such as GPs, convenience shops, nurseries etc

Offices

- 5.1.4 In reflecting the status and role of the City Centre for job growth and economic development and the need to maintain longer term competitiveness, the Core Strategy supports the provision of a first class portfolio of opportunities to serve the office market. These include the West End, South Bank (as reflected in the South Bank Planning Framework) and Quarry Hill.

5.1.5 Whilst current forecasts anticipate a need for over 1 million sq m of office floorspace district wide 2010-28, it is considered that most of this space will be accommodated in the City Centre for the following reasons:

- i) To achieve a sustainable pattern of development in Leeds with better potential for employees to reach work by public transport or on foot,
- ii) To enhance the health and viability of the City Centre by positioning the spending power of employees and businesses in close proximity to shops, restaurants, hotels, cultural, leisure and entertainment facilities,
- iii) To offer a flexible portfolio of sites within the City Centre,
- iv) To make use of sites that already have planning permission in the City Centre,
- v) To anticipate that not all out-of-centre permissions will be implemented
- vi) vi. to make optimum use of the extensive areas of development opportunity south of Leeds City Station.

Shopping

5.1.6 Retailing is integral to the City Centre and its primary status within the retail planning hierarchy. In challenging economic circumstances interest in City Centre retailing remains strong with the Trinity development due for completion in 2013 and the Eastgate development moving through the planning process. Together, these schemes will provide 130,000 sq m of net additional retail floorspace. It is also important to recognise the valuable role placed by independent retailers and Kirkgate Market. A number of enhancement schemes are planned including the Merrion Centre and Kirkgate Market.

5.1.7 Beyond the provision anticipated through the Trinity and Eastgate schemes, the City, Town and Local Centres Study 2011 identifies a need for 31,000 sqm of comparison retail space in the city centre, although it will be expected that Leeds City Centre will be the first preference for major shopping provision to meet all the vast majority of Leeds' needs for comparison shopping. The Prime Shopping Quarter (PSQ) is of a sufficient size to accommodate anticipated growth in comparison shopping for at least the short to medium period of the plan. Once the Trinity and Eastgate retail developments have completed it is probable that some retail operators will vacate floorspace elsewhere in the PSQ to take up new opportunities in these schemes. It is only after consequent vacancy has been absorbed or dealt with through modernisation or re-designation of frontages that extension of the PSQ be considered, subject to need being confirmed in a further retail study. The Council may identify locations for possible long term growth in comparison retailing which could be extensions of the PSQ or may be sited in the southern half of the City Centre, possibly associated with the Crown Point Retail Park. Over the years Crown Point has transformed into high street shopping although the retail park layout with free car parking remains. Also, with the redevelopment of the former Tetley Brewery, the physical barrier between Crown Point and the historical core of the city will be removed. As such the Core Strategy longer term vision is to assume that Crown Point Retail Park already functions as an integral part of the City Centre rather than a retail warehouse destination.

Shopping Frontages

5.1.8 A review of the extent of the primary and secondary shopping frontages will be undertaken as necessary, for example on completion of the Trinity and Eastgate shopping centres.

Retail Warehousing

- 5.1.9 Retail warehousing (also known as bulky goods retailing) across the wider district is discussed in section 4 above and section 5.3 below). The first preference is for retail warehousing to be accommodated within the City Centre boundary in order to offer good accessibility for non-car users. Large enough sites are not available in core areas adjacent to the Prime Shopping Quarter, but City Centre locations around Mabgate will be appropriate for accommodating new retail warehousing.

Convenience Shopping and Local Centres – Within the City Centre

- 5.1.10 Given the expected growth in residential and working populations in the City Centre over the plan period a need for further limited provision of convenience stores outside of the PSQ is recognised. This will be particularly true of the southern half where most growth of housing and offices is planned. In accordance with district wide retail policy, development will be controlled to channel this provision into existing and new ~~shopping parades~~ *Local Convenience Centres* within the City Centre along with complementary convenience facilities (e.g. dry cleaners, off-licenses, banking facilities, medical facilities, cafés, and pubs). Existing ~~shopping parades~~ *Local Convenience Centres* include:

- Clarence Dock,
- Great George St,
- Woodhouse Lane (University), and
- Wellington Street.

Further Local Convenience Centres may be identified in response to new evidence or new development

Conservation

- 5.1.11 The City Centre has Anglo-Saxon origins and a medieval layout in part, but it is its Victorian buildings which mark it out. John Betjeman said that “No city in the North of England has so fine a swagger...”. There are hundreds of listed buildings in the City Centre, many highly graded such as the Town Hall and the Corn Exchange (both designed by Cuthbert Broderick).
- 5.1.12 The historic environment is the backdrop for many of the economic and cultural activities that make Leeds City Centre successful, which is a testament to a flexible policy of adaptation. The re-use of historic buildings and spaces has been combined with innovative design which has made for the stimulating townscape combining the best of the old with the best of the new.
- 5.1.13 Most of the City Centre is within a conservation area which has evolved by amalgamation and extension since the 1970s. As the shape and pattern of economic development of the City Centre changes and the appreciation of heritage expands, the boundary of the conservation area needs to adapt. The existing conservation area boundary needs to be reviewed following an appraisal of the character and appearance of the conservation area and management policies adopted which reflect on conservation practice over the last twenty years.

A Growing Residential Community

- 5.1.14 With significant house building between 1995 and 2010 a substantial residential population exists in the City Centre. Despite the recession and pause in construction activity, city living remains extremely popular with little vacancy. Considerable land opportunities exist in the City Centre to boost the residential

population further. It is important that efforts are made to make best use of this opportunity in order to make efficient use of land and provide a wide housing offer for Leeds as a whole, as delivery of housing in the City Centre is key to the overall delivery of the Core Strategy. However, with some of the first residents putting down roots and wanting to continue to live in the City Centre it is important that a wider variety of sizes and types of housing are made available than have previously been built. In line with Policy H4 Housing Mix, major housing developments across the City Centre will be expected to contribute to a wider mix of dwelling sizes. Potential for creation of family friendly environments exist on the fringes of the City Centre where densities can be lower, and more green space and supporting services can be delivered, including medical and education services. The City Centre remains a good location for purpose built student housing, but excessive concentrations in one area should be avoided in line with Policy H6.

- 5.1.15 There should be higher standards of sustainability in dwellings within the Aire Valley Eco Settlement which overlaps the south eastern quadrant of the City Centre, *providing that development remains viable.*

Hospital, Universities and Culture

- 5.1.16 The City Centre contains the major teaching hospital, the Leeds General Infirmary which contributes greatly to the vitality and economy of the City Centre through the use of shops and services by thousands of staff, patients and visitors. The same type of contribution comes from Leeds University and Leeds Metropolitan University which have most of their teaching accommodation and a number of halls of residence in the City Centre and from a number of higher education colleges including music and dance which are located in or on the edge of the City Centre. There is also a wider attraction of Leeds as a centre of medical and academic excellence. Major museums exist in the City Centre at the Royal Armouries and City Museum (Millennium Sq) and major theatres at West Yorkshire Playhouse, the Grand Theatre, Royal Varieties and the Carriageworks. These facilities will be complemented by the opening of the Arena in 2013 and all contribute to the vitality, culture and economy of the City Centre. The hospital, universities and cultural venues generate large amounts of footfall and journeys which make it appropriate that their presence is largely retained in the City Centre where public transport accessibility is extremely good. Future growth in office space, shops and dwellings should be planned to sustain rather than undermine the hospital, universities and major cultural facilities. Exceptions may be made to help retain historic buildings or where floorspace will be replaced elsewhere in the City Centre.

Supporting Services

- 5.1.17 The means for delivering the range of supporting services and open spaces will include policy requirements, Section 106 Agreements and/or the Community Infrastructure Levy (CIL), and the natural incentives of the market. Policy G5 sets out the requirements for provision of sufficient civic and green spaces. The Council will support the delivery of other facilities including nurseries, schools, health facilities, convenience shops, hair dressers, laundrettes, dry cleaners, banks, restaurants, cafes, bars, and private gyms, although planning policy control will be exercised to ensure these are suitably located giving first preference to locations in centres.

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| <u>POLICY CC1: CITY CENTRE DEVELOPMENT</u> |
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The City Centre will be planned to accommodate at least the following:

- (i) 655,000 sqm of office floorspace.
- (ii) 31,000 sqm of net additional retail space (comparison), following completion of the Trinity and Eastgate schemes and subject to need being confirmed in a further retail study.
- (iii) 10,200 dwellings.
- (iv) Supporting services and open spaces *and improvements to the public realm*.

This will be achieved through implementation of outstanding permissions, decision making on planning applications, master-planning, and identification of appropriate sites and mixed use allocations through LDF allocations documents, according to the following criteria:

- a) Favouring locations with the best public transport accessibility for large scale offices,
- b) ~~Mixed office/residential schemes to site residential on upper floors and away from major roads~~ *Encouraging residential development including new buildings and changes of use of existing providing that it does not prejudice the town centre functions of the city centre and that it provides a reasonable level of amenity for occupiers*
- c) Hospital, university, college, and cultural facilities to be retained in the City Centre.
- d) Comparison retail space will only be permitted outside of the Prime Shopping Quarter when it cannot be accommodated within the Prime Shopping Quarter, or in the case of bulky goods retailing space cannot be accommodated also in areas designated for bulky goods retailing. *This will be according to NPPF sequential testing, and, in the case of proposals of 2,500sqm or more according to NPPF impact testing.*
- e) Considering proposals for convenience retailing and convenience facilities (such as dry cleaners, off-licenses, small branch banks, cafés, and pubs) as follows:
 - i) ~~below~~ *up to* 200 sqm acceptable anywhere within the city centre,
 - ii) ~~2001 – 372 sqm~~ sequential test to include the Prime Shopping Quarter and any ~~designated parades~~ *Local Convenience Centres* if they fall within 300m walking distance, *or if the proposal is not complementary to the function of office areas or entertainment or cultural destinations, including the waterfront*
 - iii) ~~3723 – 1,499 sqm~~ sequential test to include the Prime Shopping Quarter, all ~~designated parades~~ *Local Convenience Centres* and those centres identified in Policy P1 that fall within a 5 minute inbound off-peak drive time,
 - iv) 1,500 sqm and above sequential test as per iii) above plus an impact assessment on the Prime Shopping Quarter and ~~parades~~ *Local Convenience Centres* and centres identified in iii) above,
 - v) aggregating floorspace together for the purposes of the above thresholds if more than one unit is proposed,

such that where a realistic alternative opportunity exists in-centre in the first instance, or edge of centre in the second, or where the impact on the viability and vitality of the Prime Shopping Quarter, a centre or ~~designated-parade~~ *Local Convenience Centres* would be ~~harmful~~ *significantly adverse*, proposals will be resisted.
- f) A concentration of shops with ground floor frontages should be maintained in the Prime Shopping Quarter for reasons of vitality. Proposals for non-retail use should not result in the proportion of retail frontage length falling below 80% in Primary Frontages or below 50% in Secondary Frontages. Proposals for uses outside of the “A” class will not be permitted within designated ground floor frontages.

Nb All thresholds are for Gross Internal Area

City Centre South

5.1.18 The southern half of Leeds City Centre (all of the area south of the river – see Diagram 6) offers huge potential for development of offices, leisure uses, parkland, and housing, and possibly in the longer term further high street shopping. In reflecting this ambition a South Bank Planning Framework has been developed, setting out opportunities for major redevelopment including the provision of a major new City Centre park, at the heart of the City Centre to the south of the River Aire and improved pedestrian connections to the City Centre and lower Aire Valley. It is an aspiration that this development should be achieved in a street pattern, form and scale which helps unite ‘city south’ with the northern area and confirm its role as an integral part of the City Centre as a whole. It should also provide for connectivity with the existing residential neighbourhoods to the south. In particular, the anticipated opening of the southern entrance to Leeds City Station will help to reinforce the centrality of the southern half of Leeds City Centre.

POLICY CC2: CITY CENTRE SOUTH

The north and south halves of Leeds City Centre are to be more effectively integrated and better connected.

The areas of development opportunity south of the river will be prioritised for town centre uses (see list in Policy P2), particularly large scale office development, delivery of a new park, residential, cultural and leisure uses, and a strong pedestrian corridor to connect Crown Point Retail Park with the Prime Shopping Quarter and east/west links to Clarence Dock and the remainder of the lower Aire Valley. Within this priority, there is substantial opportunity for residential development. Large scale edge of centre development which would prejudice the achievement of this priority will be resisted. The suitability of this area for provision of comparison retail floorspace to be released for development will be considered (subject to the need being confirmed in a further retail study) only after the Eastgate retail development has completed and any subsequent excess retail vacancy in the remaining Prime Shopping Quarter has been taken up.

Connections

5.1.19 To address the physical and social disconnectivity between the City Centre and the inner-city (the Rim), the Council will advance and promote schemes to improve pedestrian linkages. Particular attention will be given to overcoming obstacles to movement such as Armley Gyratory, Sheepscar Junction and the Southern Inner Ring Road/M621. The West Leeds Gateway Supplementary Planning Document provides more information about Armley Gyratory. In line with Policy CC3, new development will need to be laid out and designed to improve connectivity, for example large redevelopment sites might be laid out with new traversing roads or pathways to improve connectivity; smaller developments might enhance an existing route by providing lighting or installing windows overlooking the route to improve natural surveillance.

Open Space and Permeability

5.1.20 Existing public open space will be protected and new space sought in association with new development in line with the green space policies (G3 and G5). Maximum

pedestrian permeability and public accessibility should be promoted in new development.

POLICY CC3: IMPROVING CONNECTIVITY BETWEEN THE CITY CENTRE & NEIGHBOURING COMMUNITIES

Development at appropriate locations is required to help provide and improve routes connecting the City Centre with adjoining neighbourhoods and improve connections within the City Centre in order to make walking and cycling easier, safer and more attractive.

MAP 10. Leeds City Centre

