

LEEDS SUSTAINABLE DEVELOPMENT GROUP

BY POST AND EMAIL: planning@leeds.gov.uk

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4 October 2010

Mr Phil Crabtree
Chief Planning and Development Services Officer
Leeds City Council
Leonardo Building
2 Rossington Street
Leeds
LS2 8HD

Dear Mr Crabtree

LEEDS SOUTH BANK: DRAFT PLANNING STATEMENT JULY 2010 REPRESENTATIONS BY THE LEEDS SUSTAINABLE DEVELOPMENT GROUP

The following representations have been prepared by the Leeds Sustainable Development Group (LSDG), a network of individuals who share a commitment to Leeds. The LSDG aims to contribute to Leeds' wide-ranging debate about the 'vision' and to investigate new approaches to create truly sustainable forms of development for the city. As you know we recently held an open meeting on Monday 13th September which stimulated interesting debate about the South Bank area. The meeting was well attended with a cross section of interested people, including some of your colleagues from Planning Services and the Leeds Initiative.

South Bank Draft Planning Statement - What we welcome

We welcome the Council's document which provides a good "starting point" for the consideration of new development in the South Bank area. In particular we welcome and support the following aspects:

- (a) The principles at 1.7 (a)–(f) which will help achieve Leeds' vision of going up a league, narrowing the gap, and achieving its objective as a major European City.
- (b) The objectives for the Statement as set out 1.9 (a)-(e).
- (c) The detailed Context and analysis section (section 2) and the audit of the four main sites (New Lane, Tetley, Asda and Bridge End) which provides useful benchmarking. A minor point for subsequent drafts would be to improve the cross-referencing between the text and the mapping to assist readers who are unfamiliar with the area.
- (d) We fully support and endorse the Vision for the South Bank, as set out at the start of Section 3.

Finally, we fully support and appreciate the opportunity to engage with LCC in respect of the proposals for South Bank. There is a huge opportunity for Leeds to change and progress by making a clear choice to take sustainable development seriously and making the required radical change in the way we plan. The South Bank area should be reworked in a strategic way to create the framework for an integrated, logical, attractive and sustainable mix of development. The challenge is the long term approach to realising mixed use, environmentally sensitive, socially and culturally varied development and the solution will need some innovative thinking about land ownership, financial arrangements and delivery structures.

The Park – is the heart of the Planning Statement

The South Bank Draft Planning Statement is a good response to the consensus that a new park would help to address the deficit of quality green space in Leeds city centre as originally conceived as part of the 2008 Vision Conference and we welcome the potential for the city park to deliver this within this particular area.

The idea of linking the park on the South Bank to an earlier phase on Criterion Place is an excellent concept. The prospect of facilitating the first phase of an 'iconic' park from the demise of the 'kissing towers' scheme due to the credit crunch is a very pragmatic response.

The use of the LCC-owned Criterion Place site as phase 1 provides exciting opportunities to 'set the tone' for future phases of the park. The Council could consider setting up an international design competition for the Criterion Place site and/or the bridge link over the river. This would generate much interest and be a statement of the city's confidence in otherwise uncertain times.

Furthermore, we welcome the prospect of delivering the Concordia Street bridge link which is a particularly exciting contribution, not only to the existing central area, but also to the much needed integration of the south side with the north side of the city centre.

Notwithstanding our broad support for the Park we have the following reservations:

1. A significant weakness of the park 'framework' as proposed (pp 25-26) is that it is essentially 'inward facing'. A high quality green infrastructure is needed to be delivered to the whole of the south of the city centre to provide a catalyst for the regeneration. We propose that the orientation of the park be changed from east-west to more north-south in order that it stretches down to Hunslet Road.
2. The good description of the aims of the park at 3.1 (e) does not translate into the spatial framework. We understand that the main purpose of this document is to establish the principle of a park in this location, not to detail its design, but decisions taken on this more limited level could end up prejudicing the later possibilities. It is unclear what the proposed function and use of each phase of the park will be. Ideally the park should serve a number of roles and functions e.g. 'a 'transitional' space where people walk through en-route to different destinations across the city; a 'leisure' space which people of all ages can use for activities at lunchtime and in the evenings and weekends; a 'static' space which is of sufficient quality to ensure that people will choose to stop moving and spend time there. It is this 'static' activity - e.g. people have seen something to look at; or meet someone to talk to; or they are buying something from a shop; or they have found a place to sit and watch the world go by - that makes excellent public spaces. It is therefore fundamental that the new public spaces created (a) relate to the uses and particularly the ground floor uses of the surrounding buildings, and (b) provide good all-round views and vantage points both within and out-with the space.¹
3. More 'fingers' or tributaries of green space extending both into the existing city centre and surrounding areas and connecting with existing green spaces could enhance both existing and proposed routes in all directions to ensure that the park is truly "outward facing" – connecting the surrounding communities in Hunslet, Beeston Hill, Holbeck, Richmond Hill and the Aire Valley.
4. We note that the majority of the Park south of the river is shared between the Tetley and Yorkshire Chemicals sites which are both in the pipeline for development over the medium term. We assume that the quid pro quo for the use of this land is higher density development on the balance of the sites. We query whether such density in these locations is appropriate or can be sustained.

¹ Urban Planning, 'Stop those people – The key to a dynamic space lies in slowing people down' Tim Stonor, Space_Syntax, RICS Land Journal, March 2007 pp 18-20

5. We are not clear as to the purpose of the Planning Statement in terms of site assembly. If all landowners are already fully 'signed-up' to the 'masterplan', then (in theory) delivery is more straight-forward. However, there are a number of key third party land ownerships in the area – particularly the Old Red Lion pub and the Esso garage at Bridge End which could stymie the park. We recommend that the Planning Statement be robust enough to support future compulsory purchase proceeding which would facilitate delivery of any minor land interests.
6. Similarly we are not clear about the funding mechanism for the park. The use of commuted sums in lieu of POS provision on other sites is alluded to at 3.1 e) (i) of the Planning Statement. A greater 'pool' of funds could be secured if the Planning Statement were drawn more widely. This opportunity is explored in more detail below.

The 'bigger' opportunity – not to be missed

It is acknowledged that the reality is that the landowners and/or developers are central to any development proposals but this is only a problem when decisions and agreements are made that dictate the way forward without having a dialogue with stakeholders. The limited dialogue over the past 2-3 years has revealed a consensus that the city centre requires a new park; but it is disappointing that this single aspect has apparently driven a significant decision to establish an overall strategy without any apparent recognition of the many other aspects that need to be considered if a truly sustainable development is to be created.

The area that should be considered in preparing a sustainable plan for new development in the city centre extends significantly further than the area currently offered for consultation. The stated vision in Section 3 for the South Bank of Leeds City Centre should form part of, or be derived from, a wider vision for the whole of the Leeds City Centre South (see LSDG plan) which in turn should be part of a shared vision for the whole of the city centre.

By focussing on the delivery of the Park and particularly the Tetley and Yorkshire Chemicals sites, the Planning Statement misses an opportunity to address a number of the wider issues which need to be resolved if the South Bank is to be developed in a truly sustainable way – namely:

- Commercial drivers – the reason to go South of the River
- Highways – reducing car dependence and the impact of road traffic in the city
- Access to the waterfront – and the alleviation of flooding
- Non-prescriptive development and land uses
- Infrastructure framework – economic infrastructure (sustainable energy) and social infrastructure (e.g. schools)

These themes are described in more detail below.

Commercial drivers – there needs to be a reason to go south of the river

The proposed City Park has the potential to 'make a new market' in term of perimeter development. However, given the potential scale of the South Bank development opportunity, it is also essential to work *'with the market'* i.e. to build-on and link the existing assets on the South Bank which generate footfall and therefore commercial value. In this respect the South Bank has the benefit of some key attributes in the immediate vicinity which should be embraced including: Crown Point retail park, the Royal Armouries, and the waterfront itself.

Crown Point retail park is a thriving shopping centre which was designed around the car in the 1980's as an 'out of town centre'. The opportunity is to bring this 'into the city centre'. Crown Point retail park is the same distance south of the river as Harvey Nichols is north, but few people consider walking to Crown Point. There is a huge opportunity to integrate the retail park into the fabric of the city by bringing the park down to Hunslet Road and 'reclaiming' the highway for pedestrians. Parking could be reconfigured around the back of the shop units and green space introduced into the existing square. If at some future date there is a change of use of the retail park towards residential and associated uses, linkages will already be in place.

Other historical 'assets' include Temple Works in Holbeck Urban Village and Braimes. The Planning Statement could consider future uses of these key buildings as drivers for footfall and commercial activity.

Highways – reducing the impact of road traffic in the city

The South Bank area is inextricably linked into the well established city centre infrastructure and it cannot be planned either in isolation, or prior, to a detailed and holistic analysis of the options available for amending, extending or rationalising all the relevant parts of the infrastructure.

A significant element is the existing road network and the need to establish a sustainable hierarchy of roads to accommodate both through traffic and local traffic throughout the city centre on both a macro and micro scale.

At present the roads south of the river are an 'extension of the motorway' and serve to take traffic between the motorways and the established city centre (north of the river) as quickly as possible. It is important that the traffic on Hunslet Road and Meadow Lane etc is reduced. This will reduce the barrier effect of the South Bank between the existing city centre and other areas e.g. Hunslet.

This could be as simple as re-signing the A61 around John Smeaton Viaduct. However, a long term highways solutions needs to be considered which will (i) divert all through traffic from both the South Bank area and the established city centre and (ii) provide the pedestrian links between the key commercial drivers and focal points mentioned above.

The completion of an effective, continuous inner ring road and the re-routing of the loop road are two significant components needed to establish an infrastructure in the city centre south area that will reduce the impact of the car while enhancing safe walking and cycling routes. This requires the Planning Statement to contemplate improvements to key infrastructure such as Armley Gyratory. This wider thinking *could* result in other 'wins' for the city including removing the private car from City Square - leaving this space for buses and taxis only.

Access to the waterfront – and the alleviation of flooding

Any Planning Statement for the South Bank must make reference to the possible impact of flooding and any proposed flood alleviation scheme. The requirement to 'defend' the city from future flooding is imperative, but this also presents opportunities to enhance the South Bank area in terms of living, working and recreational aspects which will increase attractiveness and therefore add value.

We are aware that various options have been considered for the flood alleviation scheme including: (i) the Environment Agency's 'walled' solution, (ii) the 'ARUP' flood alleviation channel along Hunslet Road, and (iii) lowering the weir and creating a downstream lake.

The reality could be a combination of the above, but the opportunity to do something radical on the South Bank which scores well in cost-benefit analysis should not be missed.

Non-prescriptive development and land uses

We advocate the Planning Statement as a long-term 'infrastructure framework' from which individual land owners and developers can respond to the market at it changes over time. If the framework has longevity this will give investors confidence that there is a coherent 'plan' for the South Bank area.

We do not advocate a prescriptive land use 'masterplan' which will quickly date as the property market changes. That said, consideration should be given to the broad location of the following uses/forms:

- (a) 'Large' office and residential buildings do not offer anything different from other parts of the city centre and buildings should be of a variety of heights and form.

- (b) Family housing should be encouraged over a larger area which will have the critical mass to deliver the 'new town' effect
- (c) New school, health, and convenience retail facilities should be planned for as these are necessary to achieve a truly sustainable development
- (d) Tall buildings should be encouraged closer to the city centre and on the established 'tall building' line between the Parkinson Building and City One
- (e) Environmentally advanced methods of addressing issues such as energy production and waste recycling/disposal

The important point is that the 'infrastructure' forms a coherent whole and that the development pressures of the day do not compromise future development options. Within each of the significant 'development plots', fine grain-phased development is to be encouraged. The role of the Planning Statement is to prevent this fine grain becoming 'piecemeal'.

Infrastructure framework – economic infrastructure (sustainable energy) and social infrastructure (e.g. schools)

In future, when energy is even more expensive and resource constraints are more evident, there will be greater demand for people to live, work and carry out all aspects of daily life within a narrower geographical range, with walking and cycling as the main means of moving around day to day. Urban form and functions will need to be adapted to enable more people to live like this.

The strength of a holistic 'infrastructure plan' is to widen the scope of thinking beyond the provision of a park and associated green infrastructure to, for example, localise production and change patterns of consumption by reserving suitable sites for energy generation, water management, waste treatment, food production and local repair, reuse and recycling of materials and goods. These functions may, of course, be integrated into new or altered built structures with other main purposes.

We note that at 3.3 (f), reference is made to linking the South Bank development into existing infrastructure 'such as schools' in the City Rim. We are concerned that this is the wrong approach and will not make the 'step-change' required to overcome negative perceptions. For example, a new City Centre academy as part of the Leeds College in the South Bank area could attract new family living to the area.

Conclusion

Leeds has a once in a lifetime opportunity to establish a framework to achieve its Leeds Initiative objectives. It is great to have the opportunity for debate, but let's use the opportunity to create a framework which will enable the delivery of not just a park, but all the elements of a truly sustainable development in the South Bank.

The "next steps" to making Leeds city centre truly sustainable must be based on a clear commitment to a shared vision for sustainable development. This will require that all contributory elements are included in the vision. Only by establishing a shared vision of how we want to live in our city in the future can we effectively establish a framework that the South Bank Planning Statement seeks to provide.

The LSDG is currently developing a capacity model for the entire South Bank area which we would like to share and develop, in partnership, with the Council.

This could be used to ensure that the framework establishes the requirements for sustainable development for adoption and implementation by all landowners and developers of projects, both large and small, in a cohesive way. It is important that the framework is based on sustainability principles and that the value enhancements are shared on an equitable basis. The outcomes of the capacity study will enable the development proposals to open up more opportunities for a greater range of developments

beyond just residential accommodation and thereby providing opportunities for people to be drawn into education and training, jobs and cultural experiences within the developed area.

In conclusion, we have deliberately extended our response so that it is more than a comment on the Leeds South Bank, Draft Planning Statement, in the hope that our contribution will lead to the consideration of the relationship of the South Bank to the wider area of the city centre south and its connections to the predominantly residential areas beyond.

We also hope that we can promote an enhanced way of working in partnership with Leeds City Council, so that we can develop ideas in co-operative and constructive dialogue in an atmosphere of mutual respect.

Yours sincerely

A handwritten signature in black ink, appearing to read 'DL', written in a cursive style.

DAVID LUMB
On behalf of Leeds Sustainable Development Group

cc Martin Farrington : Acting Director City Development