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Little Woodhouse Neighbourhood Planning Forum

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Leeds City Council Response to the Little Woodhouse Neighbourhood Plan
Pre-Submission Consultation (Regulation 14)

General Comments

- Thank you for consulting the Council on the Little Woodhouse pre-submission neighbourhood plan. The plan sets a positive vision for the future, is broad in scope and well evidenced. The collaboration between the forum and the council has been excellent, an exemplar on how local planning authorities should work with groups preparing neighbourhood plans, particularly in inner areas.
- You will be aware of the national planning changes on the horizon, already started this week with revisions to the National Planning Policy Framework. There are no particular changes at this stage which would have direct relevance to the Little Woodhouse plan, but we will keep you updated if there are any issues that we think you should be aware of. As well as this, the Council will be consulting in the new year on the Local Plan 2040, issues and options. We will be keen to work with the forum on this, to be joined-up and to achieve general conformity with emerging local strategic policies that are relevant to the Little Woodhouse area.
- Overall, a positive plan with credible aims and intentions to improve the area. More detailed comments below concern the practicality of applying some of the policies to planning applications. All references in these comments to the NPPF relate to the current adopted version published December 2023.
- A discussion would be welcomed on the best way to make use of the AECOM studies.

Design

- A Design officer from the Council came to a Little Woodhouse meeting in 2022 and made comments at the time, with some follow-up comments in writing. We are pleased to see that many

of these comments have already improved this revised Plan. There may still be opportunities to say more about design aspects and we feel that the best way to consider this would be to meet with the design team before revising the Plan further

Comments from the Regeneration Service

- The Council are developing a Vision document for the West End Riverside (WER) area of the city, and have appointed a consultant team led by Planit I.E. to produce this document. There is an overlap between the boundaries of the West End Riverside and the LWMP boundary. The Vision set out in the LWNP pre-submission draft is welcome and aligns with the thinking being developed in the WER Vision, particularly the following objectives:
 - Housing and community – there is an opportunity for further discussion between the Regeneration Service and the Neighbourhood Forum around aligning our approach to the emergence of new development schemes within the WER.
 - Green Infrastructure – There are opportunities around Burley Willows for uplift to greenspace. The draft WER Vision also sets out an ambition for greening streets throughout the WER through planting and SUDs.
 - Movement – the draft WER vision sets out options for improving connectivity into the city centre along Burley Road and Kirkstall Road as well as north-south connections into Little Woodhouse.
- The projects identified are welcomed and we would highlight the following projects as having strong synergies with the emerging WER Vision and we would welcome further conversations as we progress our shared aspirations further:
 - PHC3 – Placemaking Park Lane/Burley Street
 - P-HC4 – Placemaking Burley Road/Kirkstall Road corridors
 - P-G2 Play Spaces
 - P-G5 Biodiversity
 - P-M3 LW Footbridge
 - P-M5 Traffic Problems

As we move towards implementation of the WER Vision we are keen to continue to work with the Neighbourhood Forum in aligning our plans

Highways

- Opportunity to reference Healthy Streets approach to local centres like Woodsley Road (footpath widening, public realm, strategic signage, LCWIP etc), mobility hub and better connectivity to key local destinations and well as the City Centre.

Basic Conditions

- At examination, a neighbourhood plan will be judged on whether it complies with the Basic Conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). These are:
 - Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
 - The making of the neighbourhood plan contributes to the achievement of sustainable development

- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
 - The making of the neighbourhood plan does not breach, and is otherwise compatible with, retained European Union (EU) obligations
 - Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.
- It is considered that the draft Little Woodhouse Neighbourhood Plan meets the Basic Conditions subject to taking account of the comments set out in the Council's response. A Basic Conditions Statement will need to be prepared to accompany the submission of the plan for independent examination which sets out how the plan meets the Basic Conditions and other relevant legal requirements.

Mapping

- Resolution of the Plan should be improved so that the maps are clearer – possibly include enlarged maps as appendices. We are happy to work with the Forum to resolve this.

Introductory Sections

Vision

- A good, positive, locally distinctive vision and the policies set out in the Plan will help to achieve that vision
- Recognition of the importance of the historic environment to the Little Woodhouse Neighbourhood area and the contribution this makes to character and sense of place is particularly welcome. Good to see this embedded in the vision for the area and in the objectives to achieve the vision.

Objectives

- Suggest 'existing and future residents' to include for example parents at Rosebank who have not been able to find housing
- Heritage and character objective – consider including a reference to the historic green spaces of the area as well as buildings and streets as this is a significant aspect of the historic environment of the area e.g. Hanover Square and Woodhouse Square. Also consider a recognition of the surviving historic planting / trees of the area – this is a cross-over with the green infrastructure objective but recommend explicitly recognising the heritage significance of surviving historic trees and green scape of the formal squares. Also, the need to protect and care for the veteran trees and plan for their managed succession.
- Welcome the recommendation of 'retrofit over new development' in the climate change objective. Recommend considering emphasising the embodied carbon benefits of the surviving historic buildings and their adaptability to new uses and potential for sympathetic retrofit to enhance their energy efficiency and also their heritage significance with the use of appropriate materials and detailing - breathability, character, and appearance of the hist env. There is substantial Historic England guidance on achieving sympathetic energy efficiency measures in traditional buildings that could be signposted in the relevant chapter.

- ‘Restore our heritage architecture and streets’ – please note that any restoration of paved footways, cobbled streets or a mixture will need to be funded, this cannot be funded from the Highway maintenance budgets

Housing

- Paragraph 3.3.2 - Family households are generally underrepresented within the city centre and fringe areas where there is a much younger population and greater concentration of high-rise accommodation than Leeds as a whole. Due to the size and diverse nature of Leeds there will be areas in Leeds where family households dominate. A better comparison would be with other city centre fringe areas such as Holbeck, Burmantofts, Mabgate etc.
- Paragraph 4.2.4 - Reference to CS policy H3 should be H4
- Paragraph 4.3.1 - This may not be accurate - for example, there are residential areas around Lovell Park and Saxton Gardens, The Calls
- Paragraph 6.3.6 - Care needed using the term ‘original’ – elements of historic buildings may be of value even if not from the ‘original’ phase of development. Consider rephrasing – such as ‘...any work carried out respects the heritage significance of the buildings and their setting.’

Policy H1: Aiming for a balanced community

- Part a seeks to increase the amount of accommodation for families – it is not clear what criteria should be used. What would be (un)acceptable?
- Part b seeks to avoid high concentrations of students. How is this defined? Would PBSA (Purpose Built Student Accommodation) (sui generis) be caught by this policy? What concentration would be too great?
- This policy needs further thought. Perhaps the best approach would be to support H6B but with some additional criteria. H6 is much more detailed than LWNP H1 which only talks about ‘encouraging’ certain housing types. It may be that H6 provides more protection. H1 may be better as an objective as more detailed policies follow

Policy H2: Housing Mix

- B) Two units is a very low trigger for the policy, and this appears to be unreasonable, 4-5 units may be better.
- C) Any acceptable extension is ambiguous. The conversion of buildings without extensions is supported by national and local policies. Utilising extensions for COU apps may not be something that can be insisted on. Does this relate to both houses and apartment buildings?

Policy H3: Purpose-built student accommodation

- Presumably, the reason the PBSA Area is designated is that it is considered suitable for PBSA and a further test to demonstrate that a proposal does not undermine balance of communities is unnecessary?
- Is there opportunity for the Policy H3 to use the fine grain understanding of the area to provide more detailed criteria of where PBSA may or may not be acceptable outside of the Preferred PBSA Area? See Core Strategy H6B to avoid duplication.
- Design guidance is useful. The Council’s draft SPD on HMOs and PBSA may be helpful in quantifying some of the policy expectations, for example room sizes.

- Suggest a higher trigger point for community facilities e.g. over 250 rooms.
- Planning gain can only be sought to make the development acceptable in planning terms by mitigating the adverse impact of a development. There would need to be justification for community benefits in this respect.
- Consider impact of identifying preferred area for PBSA - may lead to imbalance, severance and high concentration within one area. Enhancing health and wellbeing needs to be defined. Some of the provisions of H4 could apply to H3 and vice versa - could the policies be combined?

Policy H4: Conversions to student accommodation

- Criterion e) – external amenity space - May be impossible to achieve for some properties. Exception should be written in to the criterion. Whilst it may be desirable for residents to have access to private outdoor amenity space, it is not an essential amenity. Many conversions will have no opportunity to provide private amenity space and may already have good access to local green spaces. A lot of residential accommodation in cities does not have such access, and it would be difficult to resist proposals to re-use redundant buildings where provision of such access is not physically possible.
- Criterion c) The outcome of this appears to exceed the emerging space standards for student accommodation in the draft SPD – suggest removing the words ‘without alteration.’

Policy H5: Houses in Multiple Occupation

- A local understanding of what “High concentration” means would be needed for implementation purposes.
- Develop criteria for when HMO may or may not be acceptable.
- This policy appears weaker than Policy H6 of the Core Strategy - LWNP policy 'encouraged', CS H6 'should'

Policy H6: Affordable Housing

- There may be a general conformity issue with Core Strategy policy H5 for Build to Rent. This policy allows an off-site contribution without justification.

Heritage and Character

- Would it be useful to include something specifically on the potential to restore heritage significance through sympathetic retrofit of historic buildings and improve energy efficiency at the same time?
- Paragraph 9.1.1 - Policy intention. As well as controlling new development, the policy intention appears to be also about recognising and valuing the heritage and character of the area as an end in itself and the opportunities to enhance the area’s heritage significance including through the restoration mentioned in the objective and actions identified in the Heritage Area Appraisal. Consider rewording to widen the policy intention and reflect the full aim of the heritage and character objective.
- Paragraph 9.2 - A brief intro to the concept of ‘heritage areas’ would be useful.
- Paragraph 9.3 - NDHAs (Non-Designated Heritage Assets) are part of the justification and evidence base for identifying the heritage area – recommend mentioning here and signposting to next section for full details. Consider showing the boundaries of the 3 designated conservation areas (CAs) on the heritage map

- Paragraph 10.2.1 - Fair to include the rest of NPPF para 209 about balancing harm in decisions
- Paragraph 10.3.1 - NDHAs should now be identified within CAs not just outside them. Historic England criteria is wider than the three examples provided – recommend referring to the wider criteria. Again, harm to NDHAs can be justified – NPPF para 209 ‘balanced judgement’ – the policy should be reflective of this
- Paragraph 10.3.2 - Ref to map 6 should be map 5
- Paragraph 10.3.3 - Welcome the caveat – that’s useful
- Paragraph 10.3.4 - Heritage statements are required for applications affecting NDHAs – see NPPF para 200 it refers to ‘any heritage assets affected’ which includes NDHAs as well as designated HAS
- Paragraph 12.3.3 - Data obtained from LAMP consultation available to use (albeit limited in this location).
- Paragraph 12.3.5 - Need to understand the aspect/sunlight/shade in this location when considering tree streets. Other pocket park/rain garden type interventions may be more applicable.
- Paragraph 12.3.6 - Carefully consider current bus routes, highway, and parking arrangements to improve and green public realm.
- Paragraph 13.3.3 - Typo: "This engagement has taken the form of design presentations, discussions, workshops, and walkabouts. aimed at..." suggest change to "This engagement has taken the form of design presentations, discussions, workshops, and walkabouts aimed at..."

Policy HC1: Little Woodhouse Heritage Area

- Suggest ‘preserve and enhance’ rather than ‘respect’ to reflect national policy. Suggest referring specifically to historic green spaces e.g. the squares/mature trees. Note that harm to heritage assets can be balanced by public benefit as stated in NPPF.
- "Development within and within the setting of the Little Woodhouse Heritage Area (as defined on the Policies Map) ..." suggest change to "Development within the Little Woodhouse Heritage Area (as defined on the Policies Map) and it's setting..."
- As written, the policy does not appear to add any further detail or understanding to assessing applications for heritage related proposals than the existing adopted policy and legislation

Policy HC2: Development involving non-designated heritage assets

- Policy designates the NDHA (Non-Designated Heritage Assets) - but in terms of the criteria may not add to existing national and local policy.
- NDHAs should also be identified within CAs. Other heritage opportunities are possible, and the Conservation Team would welcome a discussion with the forum about this.
- Map 5 – Suggest improvements to the plan resolution and identifying street names

Policy HC3: Design of Development

- Should include the word "normally" here for flexibility where other considerations justify. Several criteria are not design based

Policy HC4: Placemaking Opportunities

- Opportunity to explore greening and public space opportunities beyond trees. Also enhancing connectivity to nearby destinations within and outside the NA
- Under section 12 concerning Placemaking Opportunities the draft LWNP sets out the importance of Park Lane/Burley Street and of Burley Road/Kirkstall Road corridors. The emerging WER Vision

sets out proposed improvement to these corridors and identifies as a key move the creation of safe, legible, and attractive points of connectivity to better serve movement to and from the city centre and unlock north-south connectivity across the area.

Policy HC5: Leeds City College – Park Lane Campus

- Suggest the principles within the design code are moved into this policy with the design code giving more detail. Note that the Appendices are supplementary and do not form part of the Plan.

Green Infrastructure

- The draft LWNP identifies a series of Local Green Corridors, including three which sit within the WER boundary: Burley Road South Side, Kirkstall Road North Side and North-South pedestrian routes. The Regeneration service is in agreement with these identified corridors and the emerging WER Vision document sets out proposals for improved blue green infrastructure including planting along these Corridors.
- When it comes to Green Space and Play provision, it would be worth considering The Council's Planning Guidance. Green Space Guidance can be found under the link: <https://www.leeds.gov.uk/planning/conservation-protection-and-heritage/landscape-planning-and-development>
- Thought could be given to how existing green spaces and parks could be upgraded. A sort of wish list (if finance was available). This could then be ready if such opportunities arise. Also, these areas provide opportunities for successional planting and bio- diversity features.
- Perhaps an aspiration for links across the Kirkstall Road dual carriageway. The other side (adjacent to the River Aire) is subject to development proposals particularly opposite to Willow Field and Yorkshire Television. Recreational opportunities could transpire including possible access alongside the river.
- There is a lot of new tree planting in some of the existing green spaces, a lot of which are evidently dead. Such areas could be identified for replanting

Policy G1: Green Infrastructure Opportunities

- Policy G1 Green Infrastructure is welcomed but consideration of the updated Leeds Habitat Network and Green Infrastructure mapping as per the emerging Local Plan Update could be referred to: <https://experience.arcgis.com/experience/7ffebb7331754fe89f8f0aaa2b90b167> and in particular the Neighbourhood Plan could look to connect and strengthen the fragmented Leeds Habitat Network across the NP area by identifying "Leeds Habitat Network local extensions" such as the red arrows – by improving those areas for nature (meadows/fruit trees, substantial street trees possibly).

Policy G2: Local Green Spaces

- The policy should lay out what type of development is appropriate on the green spaces (recommend following the approach in the NPPF, NPG)
- Could be worth adding support for developments which improve the green space functionally of the sites (e.g. pavilions, paths, benches, statues, level access)

Policy G3: Improving Existing Green Spaces

- The aim is commendable, but it appears overly onerous and complicated and would not be an easy policy for planners or developers to use. Conflicts with G4 of the CS.

Community and Employment

- Section 17 of the draft LWNP concerns community facilities. The draft WER Vision recognises the importance of these facilities and proposes a series of community hubs to be developed alongside the development of housing across the WER area.
- Section 18 covering Employment Opportunities highlights the importance of the creative media sector to the local economy, which is also recognised in the emerging WER Vision as well as the Leeds Inclusive Growth Strategy.

Policy C1: Community Facilities

- Last paragraph - This policy appears to apply regardless of whether the proposal is resulting in the loss of an existing facility or not. It appears to go beyond the requirements of CS policy P9 with no evidence to justify the position in relation to other city centre/inner city locations.
- Appears onerous for site owners and goes against the NPPF flexible approach to uses. Includes closed wording. Pubs can be protected under separate community asset legislation. Unclear how the need for pub etc would be demonstrated.
- Suggest looking and aligning with Policy P9 of the Core Strategy. There are also questions about what a 'sufficient level of need' means locally.

Policy E1: Employment Opportunities

- Map 10 and the text of this policy need to be consistent with each other

Policy E2: Employment/Residential mixed use

- Recommend that further thought is given to the title of the policy given the Use Class Order separates employment, residential and mixed use.

Policy E3: Local shopping facilities

- Class A1 is replaced by Class E which includes a much wider range of uses. Perhaps refer to Class E(a)? Retention of shopping parade should have a criteria-based policy.

Movement

- Review existing and future ped crossing provision in areas of high footfall, near the college, university residential, hospitals but also key local centres like Woodsley Road.
- Paragraph 21.3.4 concerns movement into the city centre via Woodhouse Square and the emerging plans for a new city centre park adjoining Great George Street bridge through the Innovation Arc. A separate piece of work has been commissioned by the Regeneration service and is being developed by Mott MacDonald, looking at Infrastructure across the Innovation Arc. This will develop plans for improvements to active travel routes leading from Woodhouse Square to Great George Street.
- Review potential to promote north south bus routes to connect Burley Road and Moorland Road and Royal Park Road.

Projects and Delivery Plan

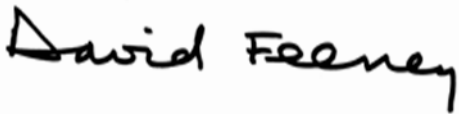
- We welcome the inclusion of projects in the Neighbourhood Plan and the Delivery Plan. We would recommend that the availability of funding and it recommended that the forum uses the Neighbourhood Plan to bid for funding in the future

Next Steps

I hope these comments are useful and help the neighbourhood planning group to review the draft Little Woodhouse Neighbourhood Plan before it progresses to examination. As mentioned, we are happy to advise further on this starting with a consideration of all of the representations received.

The comments set out here are intended as advice and to make the neighbourhood plan as robust and as effective as it can be. We will be happy to discuss any of the comments made and to work with you to revise the neighbourhood plan for independent examination.

The Council will continue to support the Forum to ensure that the plan meets the Basic Conditions and minimise the risk of the plan becoming out of date.



David Feeney
Chief Planning Officer