

# **LITTLE WOODHOUSE NEIGHBOURHOOD PLAN**

## **Report to Leeds City Council of the Independent Examination**

**By Independent Examiner, Tony Burton CBE BA MPhil (Town Planning) HonFRIBA FRSA**

**Tony Burton**  
**[tony@tonyburton.org.uk](mailto:tony@tonyburton.org.uk)**  
**May 2026**

# Contents

|    |                                                         |    |
|----|---------------------------------------------------------|----|
| 1. | Executive Summary                                       | 3  |
| 2. | Introduction                                            | 4  |
| 3. | Compliance with matters other than the Basic Conditions | 7  |
|    | Qualifying body                                         | 7  |
|    | Neighbourhood Area                                      | 7  |
|    | Land use issues                                         | 7  |
|    | Plan period                                             | 7  |
|    | Excluded development                                    | 7  |
| 4. | Consultation                                            | 8  |
| 5. | General comments on the Plan's presentation             | 10 |
|    | Vision and Objectives                                   | 10 |
|    | Other issues                                            | 10 |
| 6. | Compliance with the Basic Conditions                    | 12 |
|    | National planning policy                                | 12 |
|    | Sustainable development                                 | 13 |
|    | Development plan                                        | 13 |
|    | Strategic Environmental Assessment                      | 13 |
|    | Habitats Regulations Assessment                         | 14 |
|    | Other European obligations                              | 14 |
|    | Amended Basic Conditions and Plan requirements          | 15 |
| 7. | Detailed comments on the Plan policies                  | 17 |
|    | Housing                                                 | 17 |
|    | Heritage and Character                                  | 24 |
|    | Green Infrastructure                                    | 30 |
|    | Community, Employment and Education                     | 34 |
|    | Movement                                                | 37 |
| 8. | Recommendation and Referendum Area                      | 38 |

# **1. Executive Summary**

1. I was appointed by Leeds City Council with the support of Little Woodhouse Neighbourhood Planning Forum to conduct the independent examination of the Little Woodhouse Neighbourhood Plan.
2. I undertook the examination by reviewing the submitted Plan, associated documents and written representations, and by making an unaccompanied visit to the Neighbourhood Area.
3. I consider the Plan to be an adequate expression of the community's views and ambitions for Little Woodhouse. It is based on an effective programme of public consultation which has informed a Vision to 2033. This is proposed to be achieved through a set of eight objectives delivered through 19 planning policies mostly dealing with matters distinct to the locality and 25 projects (which do not directly form part of this examination). The Plan is supported by a Consultation Statement and Basic Conditions Statement and a Strategic Environmental Assessment and Habitats Regulations Assessment screening report. There is supporting evidence provided and there is evidence of community support and the involvement of local landowners and the local planning authority.
4. I have considered the four separate representations made on the submitted Plan. These are addressed in this report as appropriate.
5. Subject to the recommended modifications set out in this report I conclude that the Little Woodhouse Neighbourhood Plan meets all the necessary legal requirements, including satisfying the Basic Conditions. I make a number of additional optional recommended modifications.
6. I recommend that the modified Plan should proceed to Referendum and that this should be held within the Neighbourhood Area of Little Woodhouse.

## **2. Introduction**

7. This report sets out the findings of my independent examination of the Little Woodhouse Neighbourhood Plan. The Plan was submitted to Leeds City Council by Little Woodhouse Neighbourhood Planning Forum as the Qualifying Body.

8. I was appointed as the independent examiner of the Little Woodhouse Neighbourhood Plan by Leeds City Council with the agreement of Little Woodhouse Neighbourhood Planning Forum.

9. I am independent of Little Woodhouse Neighbourhood Planning Forum and Leeds City Council. I do not have any interest in any land that may be affected by the Plan. I possess the appropriate qualifications and experience to undertake this role.

10. My role is to examine the neighbourhood plan and recommend whether it should proceed to referendum. A recommendation to proceed is predicated on the Plan meeting all legal requirements as submitted or in a modified form, and on the Plan addressing the required modifications recommended in this report.

11. As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). To comply with the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
- contribute to the achievement of sustainable development; and
- be in general conformity with the strategic policies of the development plan in the area; and
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations, including the Conservation of Habitats and Species Regulations 2017.

12. An additional Basic Condition was introduced by Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in 2018 that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. I am also required to make a number of other checks under paragraph 8(1) of Schedule 4B of the Town and Country Planning Act 1990. Regulations implementing amendments to the Basic Conditions and neighbourhood plan requirements consequent on the provisions of the Levelling Up and Regeneration Act 2023 came into force during this Examination. These are not directly addressed in the Basic Conditions Statement but, informed by views expressed by Leeds City Council and Little Woodhouse Neighbourhood Planning Forum, I am content the Plan also meets these requirements.

13. In undertaking this examination I have considered the following documents as the most significant in arriving at my recommendations:

- the submitted Little Woodhouse Neighbourhood Plan
- the Basic Conditions Statement
- the Consultation Statement
- the Strategic Environmental and Habitats Regulations Assessment screening report
- the relevant parts of the existing development plan, comprising the Core Strategy (2014) (amended by selective review 2019), Site Allocations Plan 2019 (as amended 2024), Natural Resources and Waste Local Plan (2013) and the Saved Policies of the Leeds Unitary Development Plan Review (2006)
- representations made on the submitted neighbourhood plan
- relevant material held on the Little Woodhouse Neighbourhood Planning Forum and Leeds City Council websites
- National Planning Policy Framework (December 2024)
- Planning Practice Guidance
- relevant Ministerial Statements

14. No representations were received requesting a public hearing and having considered the documents provided and the representations on the submitted Plan I was satisfied that the examination could be undertaken by written representations without the need for a hearing.

15. I conducted an unaccompanied visit to the Neighbourhood Area on a weekday during April. I visited the main locations addressed in the Plan, including those shown in Maps 4 to 9.

16. Throughout this report my recommended modifications are bulleted. Where modifications to policies are recommended they are highlighted in **bold** print with new wording in “speech marks”. Existing wording is in “*italics*”. Other modifications, including to the supporting text, are also recommended and these are not in bold. The recommended modifications are numbered from M1 and are necessary for the Plan to meet the Basic Conditions. A number of modifications are not essential for the Plan to meet the Basic Conditions and these are numbered from OM1 and indicated by [square brackets]. Some further changes will also be needed to the supporting text and documents consequential to the modifications. These should be agreed between Leeds City Council and Little Woodhouse Neighbourhood Planning Forum.

17. Producing the Little Woodhouse Neighbourhood Plan has clearly involved significant effort led by the Forum’s Steering Committee following initial support by Little Woodhouse Community Association. This involved a partnership of residents, businesses, voluntary organisations, education and student representatives. The process began in 2013 and is informed by significant community and local business involvement. It has benefitted from a range of professional inputs. There is evidence of significant, positive and regular collaboration with Leeds City Council and continuing this quality of collaboration will be important to ensure implementation of the Plan. The commitment of all those who have worked so hard over such a lengthy period of time to prepare the Plan is to be commended and I would like to thank all those at Little Woodhouse Neighbourhood Planning Forum and Leeds City Council who have supported this examination process.

### **3. Compliance with matters other than the Basic Conditions**

18. I am required to check compliance of the Plan with a number of matters.

#### Qualifying body

19. The neighbourhood plan has been prepared by a suitable Qualifying Body – Little Woodhouse Neighbourhood Planning Forum – which was designated by Leeds City Council in 2016 and redesignated in 2021.

#### Neighbourhood Area

20. I am satisfied that the Plan relates to the development and use of land for a designated neighbourhood area which was designated by Leeds City Council in 2015.

21. The boundary of the neighbourhood area is shown in Map 2. It is also available online along with other designated neighbourhood areas on a map maintained by Leeds City Council.

- [OM1 – Provide a link to the online map depicting the detailed boundary of the neighbourhood area]

#### Land use issues

22. I am satisfied that the Plan's policies relate to relevant land use planning issues.

#### Plan period

23. The period of the neighbourhood plan runs to 2033. The period is shown on the front cover.

#### Excluded development

24. I am satisfied that the neighbourhood plan makes no provisions for excluded development (such as national infrastructure, minerals extraction or waste).

## 4. Consultation

25. I have reviewed the extensive Consultation Statement and relevant information provided on the Little Woodhouse Neighbourhood Plan website. It provides a clear record of the consultation process, including the materials used, that has been undertaken since 2013. This was guided by the Forum's Steering Committee.

26. The preparation of the neighbourhood plan has been open and transparent. A wide range of different engagement methods have been used, including workshops, walkabouts, leaflet drops, questionnaires, events and drop-in sessions as well as formal consultation on draft proposals. The Forum has included residents, local businesses, students, education and voluntary organisations. There has been support and involvement from ward councillors and Leeds City Council. The design of some of the consultation process has been informed directly by those being consulted, such as student input into the design of questionnaires about student priorities. There has been input from schools, faith leaders, resident's associations and landlords among others. The Forum has drawn on support from local students, academics, volunteer professionals and the Government's former Neighbourhood Planning Support Programme. Housing, heritage, green spaces and design have provided a particular focus in developing the evidence base.

27. The Forum hosts a website and maintains a contact list of interested people and organisations. Information about the neighbourhood plan and work of the Forum was physically distributed to every property in the neighbourhood area. There is a clear record of the key issues raised through this consultation and engagement activity and how it has been addressed in the Plan. Participation levels have been good.

28. The Plan was subject to Regulation 14 consultation for an extended period of time between 20 May and 2 August 2024. This included sending a leaflet to all homes and businesses in the area and organising four drop-in events. Particular efforts were made to reach students and others living in large accommodation or residential blocks. There is evidence of the consultation including the required statutory and other consultees.

29. A summary of the issues raised and the response is provided in the Consultation Statement and there is evidence of changes being made to the Plan.

30. Four separate representations have been made on the submitted Plan, including from statutory bodies, WSP on behalf of Leeds University and Yorkshire Wildlife Trust. All the representations have been considered as part of the examination and are addressed as appropriate in this report. WSP on behalf of Leeds University seeks the addition of a new policy that recognises and supports the particular contribution further education makes to the neighbourhood area. I note there is already strong support for Leeds University, the significant role it plays and the influence it has running throughout the Plan. This has been strengthened as the Plan has developed. I am content with the approach. Moreover, the choice of policies to include in the Plan and its scope is a matter for the neighbourhood forum alone. I note Leeds City Council's advice that such a new policy would not add significant value to the Plan.

31. I am satisfied with the evidence of the public consultation undertaken in preparing the Plan. The Plan has been subject to appropriate public consultation at various stages in its development and a considerable effort has been made to reach as wide a range of people and organisations as possible. Participation rates have been good and appropriate opportunities to shape the Plan as it has developed have been provided. The Plan has been amended as a result of the consultation feedback. The local planning authority has been engaged fully through the process.

## 5. General comments on the Plan's presentation

### Vision and Objectives

32. The Plan includes a Vision for Little Woodhouse to 2033. This is positive in intent and there is evidence of it reflecting consultation feedback. The Vision is consistent with sustainable development and is complemented by the Plan's eight Objectives.

### Other issues

33. The Plan is clearly structured, well written and has a consistent format. It explains the intent of each policy and generally provides evidence to support it.

34. The expectation in national Planning Practice Guidance in relation to neighbourhood plans is that they should *"be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared"* (NPPG Paragraph: 041 Reference ID: 41-041-20140306). This is reflected in the general approach which is to focus on issues of particular interest to the community although there are a number of policies which do not add to issues already covered by the Leeds City Plan. These are addressed in my examination of the individual policies.

35. The Policies are clearly identified by green tinted boxes and generally supported by evidence although there are issues relating to the evidence base which I address in relation to individual policies.

36. Extensive use is made of a range of evidence. This is presented in Appendices or footnotes with links to documents provided on the neighbourhood forum's website. Some of the references are quite old which reflects the long gestation period of the Plan. There are areas where the evidence supporting individual policies is limited or lacking and these are addressed in the detailed commentary later in this report. The Plan includes significant design guidance and codes, including for specified areas, in Parts Two, Three and Four. This has been produced by AECOM as part of the Government's former Neighbourhood Planning Support Programme and is of an appropriate quality. It will help if all the Parts and Appendices can be linked from Part One of the Plan.

- [OM2 – Provide direct links to the Parts and Appendices from Part One]

37. The Plan includes 11 maps. These are generally clear although it would be helpful to have them available at a larger scale so precise locations and boundaries can be determined. There are multiple instances of different map numbers being used on the same maps and all numbering, including in the supporting text and policies, needs to be updated. Ideally the contents of the maps would be presented alongside other development plan policies by Leeds City Council where appropriate.

- [OM3 – Provide links to larger scale/online versions of the Plan’s maps where possible and provide consistent numbering]

38. A number of Plan policies state what “*must*” or “*shall*” happen when determining planning applications. Neighbourhood plans need to be positively prepared and avoid being overly restrictive and there are few situations where such a prescriptive approach is appropriate. I make recommendations to amend relevant policies to replace “*must*” or “*shall*” with “*should*”.

39. There are some presentational issues and corrections which should be addressed when finalising the Plan, including:

- Inconsistency between Policy HC2 title in Contents and Section 10
- Inconsistency between Policy E2 title in Contents and Section 19
- Inconsistency between Section name “*Community and Employment*” in Contents and “*Community, Employment and Education*” on page 49
- Incorrect page number for Policy M1 in Contents
- Page 4 – bookmark not defined
- Incorrect numbering of Maps 6, 7, 8, 9, 10 and 11
- [OM4 – Make identified corrections in the final Plan]

## 6. Compliance with the Basic Conditions

### National planning policy

40. The Plan is required to “*have regard*” to national planning policies and advice. This is addressed in the Basic Conditions Statement which relates each of the Plan’s policies and objectives to the National Planning Policy Framework (NPPF). The Basic Conditions Statement correctly relates the Plan to the December 2024 version of the NPPF.

41. The Basic Conditions Statement includes a table that relates each of the Plan’s policies to identified sections of the NPPF and provides a short commentary. No instances of conflict are identified and the assessment concludes that “*the NP has been prepared in conformity with the policies set out in the NPPF*”.

42. I address some issues with regard to national planning policy in my consideration of individual policies and recommend some modifications. These include addressing areas where the drafting of the Plan’s policies needs to be amended in order to meet the NPPF’s principles regarding the clarity of policies, the need for policies to be positively worded, to serve a clear purpose and to avoid duplication. I also address the requirement expressed in national planning policy and Planning Practice Guidance that “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*” (NPPG Paragraph: 041 Reference ID: 41-041-20140306).

43. I agree with the Basic Conditions Statement and conclude that overall the Plan has regard to national planning policy and guidance but there are exceptions as set out in my comments below. These include the need for some policies to be more clearly expressed and/or evidenced, for policies to be positively worded and avoid being overly restrictive, for policies to serve a clear purpose and for duplication with other planning policies or the NPPF to be avoided.

44. I am satisfied that the Plan meets this Basic Condition other than where identified in my detailed comments and recommended modifications to the Plan policies.

#### Sustainable development

45. The Plan must *“contribute to the achievement of sustainable development”*. This is addressed in the Basic Conditions Statement by relating the Plan’s policies to each of the economic, social and environmental objectives of the planning system which contribute to sustainable development and providing a short commentary. It concludes that *“overall, it is considered the neighbourhood plan contributes positively, when read as a whole, to the three objectives of sustainability identified in the NPPF”*. I am satisfied that the overall contribution of the Plan to sustainable development is positive and that the Plan meets this Basic Condition.

#### Development plan

46. The Plan must be *“in general conformity with the strategic policies of the development plan”*. The Basic Conditions Statement addresses this by summarising how the Plan’s policies respond to relevant development plan policies with a short commentary. No conflicts are identified. In some instances the Basic Conditions Statement considers policies in the Local Plan Update despite these not being adopted. This does not lead to any conflict with the requirement to be in general conformity.

47. Leeds City Council is content with the Plan’s general conformity with the strategic policies of the development plan.

48. I am satisfied the Plan meets this Basic Condition other than where identified in this report.

#### Strategic Environmental Assessment

49. The Plan must be informed by a Strategic Environmental Assessment if it is likely to have significant environmental effects. A screening report on the policies in the pre-submission draft Plan was undertaken by Leeds City Council (April 2024). This concluded

that *“it is unlikely that any significant environmental effects will arise as a result of the Little Woodhouse Neighbourhood Plan”* and *“that an SEA is not required”*. Historic England agreed with this conclusion and Natural England did not disagree. Environment Agency did not express a view.

50. Neither Leeds City Council nor Little Woodhouse Neighbourhood Planning Forum consider there to have been changes between the pre-submission and submitted Plan which raise issues relating to the SEA screening report.

51. I am satisfied by the screening report and that the Plan meets this Basic Condition.

#### Habitats Regulations Assessment

52. The Plan must be informed by a Habitats Regulations Assessment if it is likely to lead to significant negative effects on protected European sites. A screening report of the policies in the Plan was undertaken by Leeds City Council (April 2024). The assessment concludes that *“the plan is unlikely to have any significant effects on the designated European wildlife sites, alone or in combination with other projects and programmes”*. Natural England agrees with this conclusion and Environment Agency expressed no view.

53. Neither Leeds City Council nor Little Woodhouse Neighbourhood Planning Forum consider there to have been changes between the pre-submission and submitted Plan which raise issues relating to the Habitats Regulations Assessment screening report.

54. I am satisfied with the screening assessment and conclude that the Plan meets this Basic Condition.

#### Other European obligations

55. The Plan must be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations. The Basic Conditions Statement addresses the ability of all to contribute through the consultation process. It includes an assessment of the impact of the Plan on persons with protected characteristics and concludes *“it is not considered that the NP is likely to have any specific or particular impact on*

*any persons with a protected characteristic. Overall, the NP is likely to either have neutral benefit, or a general positive benefit for all residents of Little Woodhouse with increased inclusivity and accessibility through support for improved community facilities and services, a greater mix of housing and enhanced green space”.*

56. No contrary evidence to the Plan meeting this Basic Condition has been presented. There is good evidence of changes being made to the Plan during its preparation. I consider that there has been adequate opportunity for those with an interest in the Plan to make their views known and representations have been managed in an appropriate manner with changes made to the Plan.

57. I conclude that the Plan meets this Basic Condition.

#### Amended Basic Conditions and Plan requirements

58. The provisions of the Levelling Up and Regeneration Act 2023 amending the requirements for neighbourhood plans and the Basic Conditions came into force after consultation on the submitted Plan. On request Little Woodhouse Neighbourhood Planning Forum provided assurance that as far as it considers appropriate and having regard to the subject matter of the plan, the Plan is designed to:

- secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change; and
- take account of any local nature recovery strategy that relates to all or part of the neighbourhood plan area.

59. The Plan policies and design codes consider climate change adaptation and the Local Nature Recovery Strategy for West Yorkshire was published after submission of the Plan.

60. On request both Leeds City Council and Little Woodhouse Neighbourhood Planning Forum confirmed their view that the making of the Plan would not result in less housing being proposed in the neighbourhood area than if the Plan was not made.

61. Given the content of the Plan I am satisfied that the new requirements and Basic Condition are satisfied.

## 7. Detailed comments on the Plan policies

62. This section of the report reviews and makes recommendations on each of the Plan's policies to ensure that they meet the Basic Conditions. I make comments on all policies in order to provide clarity on whether each meets the Basic Conditions. The examination does not address the projects. Some of the supporting text will need to be amended to take account of the recommended modifications.

### Housing

63. **Policy H1** – This supports a greater mix of homes in an area with a high concentration of student accommodation

64. The need for a greater mix of different homes to support a more balanced community is a recurring issue in the neighbourhood area that has been identified through consultation on the Plan. This is supported by evidence that shows the very high levels of student accommodation compared to the rest of Leeds. The need to address the impact of over-concentrations of houses in multiple occupation (HMO) and purpose-built student accommodation (PBSA) is recognised in Leeds Core Strategy Policy H6.

65. The Policy drafting is positively worded. It is unduly restrictive in stating what “*must*” happen and it is more correct to state that the intended outcome is “*more balance*” than a “*rebalance*”. There is no state of balance to which the area is being returned.

66. Policy H1 does not meet the Basic Conditions.

- **M1 – Amend Policy H1 to replace**
  - “*must*” with “*should*”
  - “*a rebalance*” with “*more balance*”

67. **Policy H2** – This supports residential development that provides a mix of dwelling types that meets identified local needs.

68. The Policy is consistent with the Plan's ambition for a greater housing mix. The approach is consistent with Core Strategy Policy H4 which provides a target housing mix by number of bedrooms with flexibility related to the character of different parts of the city. The evidence base confirms the neighbourhood area to be of such a character that the target housing mix should be applied.

69. The Policy drafting is unduly restrictive in stating what "*must*" happen and there is no evidence supporting development proposals as small as two units providing family accommodation. Part c) stands more clearly as a separate paragraph stating what "will" be required.

70. Policy H2 does not meet the Basic Conditions.

- **M2 – Amend Policy H2 to:**
  - **Replace "*must*" with "*should*" in all instances**
  - **Replace b) with "where between two and ten units are proposed the provision of at least one new dwelling suitable for family accommodation will be supported"**
  - **Delete the lettering "*c*" and make the text which follows a separate paragraph**
  - **Replace "*would require justification*" with "*should be justified*" in the final paragraph**

71. **Policy H3** – This requires PBSA to be located, designed and managed in accordance with the PBSA Design Code which includes designation of a PBSA Area shown on Map 4.

72. Policy H3 is consistent with the strategic approach in Leeds Core Policy H6 and addresses the significant impact of PBSA on the neighbourhood area by defining an area within which PBSA should be located. Three exceptions are identified and appropriately defined.

73. The PBSA area is defined in the PBSA Design Code which has been produced by AECOM. Its production has included public consultation and discussions with PBSA providers and Leeds City Council. The boundary of the PBSA area has been informed by a character analysis.

74. There is general support for the approach. It would be helpful if Map 4 were available at a larger scale so its precise boundary can be confirmed, including where it appears to cut across existing buildings. I was provided with an updated map which addresses issues with the boundary by including the Iconinc building and the recently completed Torsion PBSA scheme in Burley Street.

75. The Policy identifies three additional areas where PBSA may be appropriate. These include the University of Leeds Western Campus and I share the view made in representations by WSP on behalf of Leeds University that this is a different location insofar as it already forms part of the university estate and is not located in a residential or mixed use area. There is no evidence put forward regarding the appropriate balance of PBSA against other uses in the Western Campus and the Policy introduces an unjustified restriction in stating that PBSA should be a “*minority element*”. The proportion of PBSA should be determined as part of the masterplanning and development management process. I also support representations from WSP on behalf of Leeds University clarifying that development should result in no “net” loss of green space. This provides necessary flexibility while recognising the value of green space in the area.

76. Map 4 shows an area of the Western Campus where PBSA may also be acceptable. This differs from the boundary for the Western Campus shown in the Appendix C Design Code Document (page 22). This has been explained by the Little Woodhouse Neighbourhood Forum in terms of excluding the Maurice Keyworth Building as it is listed and excluding the recently constructed Liberty Building. This rationale is unclear given that not all of the Maurice Keyworth Building is listed and the additional area includes the Michael Marks Building which is proposed to be recognised as a non-designated heritage asset. I share representations made by WSP on behalf of Leeds University that the wider area of the Western Campus should be identified. The PBSA Design Code and General

Design Guidance and Code in Policy HC3 and heritage protections will have a strong influence over the nature and quality of development.

77. As well as defining the PBSA area and other sites where PBSA may be acceptable Policy H3 sets out design principles which come from the PBSA Design Code. There are inconsistencies in the drafting of the principles and their headings between Policy H3 and the PBSA Design Code. The Policy also includes a principle on “*community benefit*” that is not a design consideration and does not appear in the PBSA Design Code. Notwithstanding its importance this should be deleted from the proposed set of design considerations. To avoid confusion over different drafting I recommend that Policy H3 makes reference only to the main headings in the PBSA Design Code other than in respect of “*Location*”. There is a missing reference to Map 4 in Principle 5 of the PBSA Design Code on page 15 and Map 4 should also be referenced in Principle 2 on page 7.

78. The Policy drafting is unduly restrictive in stating what “*must*” happen.

79. Policy H3 does not meet the Basic Conditions.

- **M3 – Amend Policy H3 to read:**

**“Policy H3: Purpose-built student accommodation**

**The development of purpose-built student accommodation (PBSA) should be located, designed and managed in accordance with the Principles set out in the “PBSA Design Code”:**

**1 Health and Wellbeing**

**2 Location: PBSA will normally only be permitted if it is located within the “PBSA Area” shown on Map 4. The only exceptions are:**

**a) within the Park Lane Campus in accordance with the Park Lane Campus Design Code;**

**b) within the University of Leeds Western Campus provided there is no net loss of existing green space and any development reflects the existing scale of buildings there; and**

c) at Josephs Well where it respects the architectural and historic quality of the existing heritage asset.

Any PBSA development should ensure that the character and amenity of any existing nearby residential uses are not adversely affected by it.

- 3      **Connections and Movement**
- 4      **Communal Amenities and Facilities**
- 5      **Building Design**
- 6      **Room design**
- 7      **Management”**

- **M4** – Add references to Map 4 in PBSA Design Code principles 2 and 5
- **M5** – Amend Map 4 to show an expanded area for the Western Campus consistent with that on page 22 Appendix C Design Code Document
- **M6** – Use the updated Map 4 provided to show the boundary of the PBSA area

80.      **Policy H4** – This establishes planning considerations for the conversion of buildings to student accommodation.

81.      The nature of the large Victorian housing stock in the neighbourhood area means it is subject to high levels of conversion. The Policy establishes relevant planning considerations to manage this process, including supporting conversions which can readily be altered for other residential use as part of the contribution to a mixed and balanced community. The Policy is positively drafted and supports shared housing in the neighbourhood area.

82.      It is unduly onerous to state that conversions will “*only be permitted*” which address all the considerations. It is also unduly onerous both to expect a design statement to be produced for all relevant planning applications, as this is not a national or local validation requirement, and to specify that a management plan prepared in consultation with the local community is required in all instances. It would be appropriate to reference these preferred approaches in the supporting text.

83. The reference to meeting “*current standards*” for bin storage duplicates existing planning policy and there are other drafting improvements to improve clarity of the Policy or make it less onerous.

84. Policy H4 does not meet the Basic Conditions.

- **M7 – Amend Policy H4 to:**
  - Delete “, *via a design statement,*” in the first paragraph
  - Replace “*only be permitted*” with “be supported” at the beginning of the second paragraph
  - Insert “significantly” after “*amenity*” in b)
  - Insert a comma after “*others*” in f)
  - Delete “, *meeting current standards as a minimum,*” in f)
  - Delete “*Priority should be given to designing*” in g) and insert “is provided wherever possible” at the end
  - Delete “, *prepared in consultation with the local community,*” in h)

85. **Policy H5** – This seeks to control the detrimental impact of HMOs and support their conversion to residential use.

86. The neighbourhood area is recognised as having a high concentration of HMOs and is covered by an Article 4 Direction removing permitted development rights. There is adequate evidence identifying the issues and impacts associated with HMOs.

87. It is inappropriate for the drafting to include a policy “*presumption*” which is inconsistent with the general presumption in favour of sustainable development in national planning policy.

88. Policy H5 does not meet the Basic Conditions.

- **M8 – Amend Policy H5 to:**
  - Replace *“There will be a presumption against”* with *“Proposals for”*
  - Replace *“unless it can be shown that the development”* with *“should demonstrate they”*

89. **Policy H6** – This requires affordable homes to be provided on site or otherwise within the neighbourhood area where possible.

90. While there is evidence of housing need within the neighbourhood area the provision of affordable homes is already addressed in Core Strategy Policy H5 and, given high levels of housing need also exist elsewhere, the evidence does not support a distinct approach to the neighbourhood area. The Core Strategy establishes an expectation of provision on site or otherwise in the locality (e.g. paragraph 5.2.17.4 for provision via commuted sums). Consequently the Policy also duplicates existing development plan policy and serves no clear purpose (paragraph 16, NPPF).

91. Given that affordable housing was a significant issue raised throughout public engagement on the Plan it would be appropriate for the matter to be addressed in the supporting text and I am content with the wording agreed between Leeds City Council and Little Woodhouse Neighbourhood Forum as follows:

“The lack of affordable housing was raised many times throughout consultation on the Neighbourhood Plan. As it is a policy already covered in the Leeds Local Plan, it is not possible to duplicate the policy in the Little Woodhouse Neighbourhood Plan. Local Plan Policy H5 states that any affordable housing provision should be on site unless there is robust justification. As a general principle, the text to that policy states that where a commuted sum is justified, “it should be calculated to ensure that the required quantity and type of affordable dwellings can be delivered in the locality of the development”. Provision of affordable housing within the Little Woodhouse Neighbourhood Area would help to deliver the more balanced community envisaged by the Vision.”

92. Policy H6 does not meet the Basic Conditions.

- **M9 – Delete Policy H6**
- [OM5 – Insert supporting text on affordable housing as agreed between Leeds City Council and Little Woodhouse Neighbourhood Forum]

### **Heritage and Character**

93. **Policy HC1** – This identifies a Heritage Area within which particular considerations are to apply.

94. The Little Woodhouse Heritage Area has been identified through an appraisal of the three Conservation Areas which overlap the neighbourhood area and further areas which contain non-designated heritage assets with a setting worthy of protection. The intention is to supplement and not replace existing protections for Conservation Areas. The process for identifying non-designated heritage assets and buildings making a positive contribution has been informed by the criteria advised by Historic England. The approach is systematic and informed and aligns with my own assessment when visiting the area. On request a clear rationale was provided for not including the local centre within the Heritage Area despite the number of positive buildings and non-designated heritage assets it contains. This is on the grounds that there is less consistency of style and the variety of shopfront extensions has eroded the overall character of the area.

95. The Policy drafting addresses elements distinct to the Heritage Area and is sufficiently consistent with national planning policy except in relation to the requirement for development to “preserve and enhance” Conservation Areas. There are minor improvements to the drafting recommended.

96. Map 5 includes reference to “positive boundaries” although these are only visible in more detailed maps provided in Appendix B. I was provided with an updated Map 5 and recommend that this is used.

97. Policy HC1 does not meet the Basic Conditions.

- **M10 – Amend Policy HC1 to:**
  - Replace “*respect*” with “**preserve and enhance**” in the second line
  - Insert “**respect**” before “*the historic*” in the second line
- [OM6 – Amend the Policy drafting to replace:
  - “*it’s*” with “*its*” in the first line
  - “*The*” with “*the*” in the second bullet
  - “*How*” with “*how*” in section a)]
  - [OM7 – Use the updated Map 5 concerning the heritage of the neighbourhood area]

98. **Policy HC2** – This introduces planning considerations for the non-designated heritage assets and for positive buildings in the Heritage Area.

99. Non-designated heritage assets, and “*positive buildings*” in the Heritage Area which “*contribute positive to its overall character, by virtue of age, materials and location, but do not meet the threshold as a non-designated heritage asset*” have been identified through a combination of research and consultation following the criteria advised by Historic England. These are shown in Map 5 and Appendix B.

100. WSP on behalf of Leeds University does not support the Michael Marks Building moving from being a “positive building” to a non-designated heritage asset. This is on the grounds that its group value has been overstated and there is no longstanding historical association with its use as the Marks and Spencer archive. I share this view. Nevertheless I agree with the assessment provided in the evidence of the architectural significance of the building and do not agree with representations that have considered this only in terms of its cohesiveness with neighbours. I am content with the Michael Marks Building being recognised as a non-designated heritage asset.

101. I note the support from WSP on behalf of Leeds University for removal of Clarendon Building as a positive building and am content with this.

102. The drafting of Policy HC2 largely repeats that of Policy HC1 and so serves no clear purpose (paragraph 16, NPPF). The policy considerations relevant to non-designated heritage assets lying outside the Heritage Area and so not covered by Policy HC1 are already addressed in national planning policy, as noted in paragraph 10.21. Consequently my assessment is that Policy HC2 should serve only to identify the non-designated heritage assets and positive buildings in the neighbourhood area allowing for the possibility that others may be identified. The planning considerations for development management purposes are already provided in national planning policy, the Local Plan and Policy HC1 and should not be included.

103. Policy HC2 does not meet the Basic Conditions.

- **M11 – Replace Policy HC2 with:**

**“The non-designated heritage assets and positive buildings in the neighbourhood area include those identified in Map 5 and Appendix B.”**

104. **Policy HC3** – This establishes a number of planning considerations to secure a high quality of design, including specifically in relation to shop fronts in the Burley Lodge (Woodsley Road) Local Centre.

105. The Policy is informed by the general support for good design in national planning policy and the Local Plan and an analysis of the particular characteristics of the neighbourhood area which informs the *General and Character Area Design Guidance and Design Codes* provided in Part Two of the Plan. I am content with the approach although it goes beyond design considerations.

106. The Policy drafting differs from that in Part Two and paraphrases its content in an abbreviated form. The Policy references only the “*General Design Code*” whereas Part 2 includes fuller “*General Design Guidance and Codes*”. To avoid confusion over different drafting I recommend that Policy HC3 makes reference only to the General Design Guidance and Codes. The drafting is unduly restrictive in stating what “*must*” happen.

107. The last part of the Policy references Burley Lodge (Woodsley Road) Local Centre. This is identified in Leeds Core Strategy Policy P10 and the Leeds Site Allocations Plan and I recommend that direct reference is made to this in the supporting text. Inclusion of a Map showing the boundary of the Local Centre would be helpful.

108. Policy HC3 does not meet the Basic Conditions.

- **M12 – Amend Policy HC3 to:**
  - Replace “*must*” with “*shall*” in the first line
  - Replace “*General Design Code*” with “**General Design Guidance and Codes**” in the third line
  - Delete from after “*Part 2*” to end of section k)
- M13 – Include reference to Core Strategy’s and Leeds Site Allocations Plan’s designation of the Burley Lodge (Woodsley Road) Local Centre in the supporting text
- [OM8 – Reference the map showing the boundary of the Burley Lodge (Woodsley Road) Local Centre provide in the new map showing local shopping facilities]
- [OM9 – Change Policy title and supporting text to “Design and Quality of Development”]

109. **Policy HC4** – This supports consideration of ways to improve spaces, corridors and connections in the neighbourhood area and specifically identifies five locations which offer particular opportunities.

110. The Policy is informed by considerations throughout the Plan’s preparations for the opportunities to improve the spaces between buildings and support improvements to the quality of corridors and connections within the neighbourhood area. The design and character analysis undertaken for the Plan and targeted consultation informs the selection of five locations as particular opportunities which are shown in Map 6. These are also

identified as Plan projects. There is particular support from Yorkshire Wildlife Trust in its representations on the nature positive placemaking principles in the Plan.

111. There is a mismatch between the colours used to depict the five placemaking opportunities in Map 6 and those used in the Legend. Two of the locations extend beyond the neighbourhood area and the fact that these parts are outside the scope of the neighbourhood plan should be recognised in the supporting text. I suggest Map 6 should be referenced directly in the Policy.

112. Policy HC4 meets the Basic Conditions.

- M14 – Recognise that two of the identified placemaking opportunities extend beyond the neighbourhood area in the supporting text, for example by including “It is recognised that where these locations extend beyond the neighbourhood area they are outside the scope of the neighbourhood plan” in paragraph 12.3.3
- M15 – Amend the Key to Map 6 so the colour and shading of the placemaking opportunities depicted is clear and consistent
- [OM10 – Replace “*should be taken in these areas*” with “locations shown in Map 6 should be taken” in Policy HC4]

113. **Policy HC5** – This requires development in the Park Lane Campus to be carried out in accordance with the Design Code.

114. Park Lane Campus is a distinct location within the neighbourhood area where there is the possibility of significant new development. The Park Lane Campus Design Code has been prepared and produced as Part Four of the Plan. There is good evidence of the involvement of the landowner as well as residents, business, the local authority and representatives of Leeds City College. No critical comment has been provided on the Policy in representations on the submitted Plan.

115. The Policy references the “*University Centre*” site and it is not immediately clear how this relates to the Park Lane Campus. I was informed that Park Lane Campus comprises

both Park Lane College (which is not mentioned in the Policy or supporting text) and the University Centre. I recommend drafting improvements to address this and also to improve clarity and relate the Policy to all development proposals in the identified area.

116. Policy HC5 sets out design principles which come from the Park Lane Campus Design Code. There are inconsistencies in the drafting of the principles and their headings between Policy HC5 and the Park Lane Campus Design Code. As with Policy H3 to avoid confusion over different drafting I recommend that Policy HC5 makes reference only to the main headings of the principles in the Park Lane Campus Design Code.

117. Policy HC5 does not meet the Basic Conditions.

- **M16 – Replace Policy HC5 with:**  
**“Development proposals within the Leeds City College Park Lane Campus (shown on Map 7) should be carried out in accordance with the Principles set out in the “Park Lane Campus Design Code”:**
  - 1. Context and Local Impact**
  - 2. Uses, activity and adaptability**
  - 3. Movement and Connectivity**
  - 4. Identity**
  - 5. Built Form**
  - 6. Public Space**
  - 7. Homes and buildings**
  - 8. Resources and climate change**
  - 9. Nature**
  - 10. Lifespan”**
- **M17 – Amend the first part of paragraph 13.3.1 to read "The Park Lane Campus, including Park Lane College and the University Centre, are both run by..."**

## Green Infrastructure

118. **Policy G1** – This identifies green infrastructure within the neighbourhood area, including green corridors, along with locations where there are opportunities for its improvement, and sets out policy considerations for retaining and replacing trees and hedges.

119. The Policy is informed by the major influence of local topography on the neighbourhood area with a significant network of green infrastructure. The Plan seeks to build on the strategic green infrastructure (and opportunities) identified in Local Plan Policy G1 and saved UDP Policy N8 and shown in Map 8.

120. An analysis of the neighbourhood area has identified ten Local Green Corridors shown on Map 8 with the background provided in Appendix D. I am content with the approach after visiting each of the proposals. The north-south pedestrian routes (LGWC10) are not provided on Map 8 and they are only described in Appendix D. On request I was provided with a separate Map 8a showing their location and I am content with this. A drafting change is recommended as the Local Green Corridors are not *“proposed”* in the final Plan. Map 8 is at a small scale and a larger scale and/or online map should be provided enabling the detailed boundaries to be determined consistent with OM3.

121. There is limited analysis and justification supporting the approach to retaining and replacing trees or justifying an approach distinct to the neighbourhood area. Policy LAND 2 of the Natural Resources and Waste Local Plan (2013) already establishes a policy expectation to conserve trees and support new planting along with tree replacement on a minimum three for one basis and planting design and specification according to best practice. I conclude the second part of the Policy does not *“serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”* as required by national planning policy (paragraph 16, NPPF).

122. Policy G1 does not meet the Basic Conditions.

- **M18 – Amend Policy G1 to:**
  - **Delete “*proposed*” in line three**
  - **Delete the second paragraph**
- **M19 – Include new Map 8a in the final Plan**

123. **Policy G2** – This designates 10 Local Green Spaces to be afforded equivalent protection to Green Belt.

124. The Policy is supported by the boundaries and location of each proposed Local Green Space being shown in Map 8 with further details of their location, appearance and rationale for them being considered locally significant in Appendix E. It is noted that such spaces have a particular significance due to the relative lack of gardens in the neighbourhood area.

125. The ten green spaces have been identified through a combination of their inclusion in the Leeds Site Allocations Plan, the neighbourhood specific work on design and local character and public engagement. Designation as Local Green Space offers a higher level of protection for those spaces already identified in the Leeds Site Allocations Plan under Policy GS1 and Core Strategy Policy G6.

126. Maps showing the boundaries of each Local Green Space are provided in Map 8, Figure 1 (Appendix E) and in the individual assessments of each Local Green Space in Appendix E. There are some differences in the boundaries shown in Figure 1, especially for LGS3 (which does not extend to the south east in Figure 1) and LGS6 (which includes additional land adjacent to the building to the west in Figure 1). There are other minor anomalies between Figure 1 and the other maps which suggests it was separately prepared. This was confirmed by the neighbourhood forum and I recommend removing Figure 1 from Appendix E to avoid any confusion. It would be appropriate to include Map 8 in Appendix E if desired.

127. There are minor inconsistencies between the naming of some of the Local Green Spaces between Policy G2 and Appendix E. On request the neighbourhood forum confirmed

the names to be used are as in Policy G2 with the exception that “*Marlborough Tower*” should be named “*Marlborough Towers*”. These names should be used consistently throughout the Plan and its appendices.

128. Appendix E addresses the reasoning behind designation of each Local Green Space in accordance with the requirements of the National Planning Policy Framework (paragraph 107). The evidence provided is adequate. Landowners have been consulted as part of the process for preparing the Local Plan and no representations have been received objecting to any of the proposed designations.

129. I visited each of the proposed Local Green Spaces and agree with the rationale and proposed boundaries with one exception. LGS9 Chorley Lane comprises separate parcels of green space divided by a significant road and it should exclude the tarmacked area of Clarendon Road and its junction with Woodhouse Square. A number of the proposed Local Green Spaces include a mix of hard and soft landscaped areas and I consider this entirely appropriate within a city environment.

130. To be afforded protection Local Green Spaces need only be designated by the Plan. This follows a Court of Appeal case relating to a Local Green Space policy in a neighbourhood plan (Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council, [2020] EWCA Civ 1259) which means it is inappropriate without clear justification to include any wording that sets out how development proposals should be managed. No such justification has been provided in the submitted Plan and its supporting documents.

131. Policy G2 does not meet the Basic Conditions.

- **M20 – Amend Policy G2 to delete “*where development which would be considered inappropriate in the Leeds Green Belt will not be approved except in very special circumstances*”**

- M21 – Use the following names for each Local Green Space consistently in Policy G2, Appendix E and throughout the Plan and its appendices:

LGS1 Hanover Square

LGS2 Woodhouse Square

LGS3 The Rosebank Millennium Green

LGS4 Hyde Park Road (Benson Court)

LGS5 The Willows

LGS6 Duncombe Street

LGS7 Marlborough Street

LGS8 Marlborough Towers

LGS9 Chorley Lane

LGS10 Kendal Grove

- M22 – Amend the boundary of Chorley Lane Local Green Space to exclude the tarmacked area of Clarendon Road and its junction with Woodhouse Square

132. **Policy G3** – This expects details of the improvements resulting from off-site green or open space provision to be provided as part of relevant development proposals.

133. The Policy is informed by the many opportunities for improving the quality and functionality of green spaces throughout the neighbourhood area. It is positive in intent although it is not appropriate for the nature of consultation on proposals to be included in the policy drafting. This can be encouraged in the supporting text. The Policy drafting can be improved to recognise that both formal and informal provision can be made at the same time in some instances.

134. Policy G3 does not meet the Basic Conditions.

- **M23 – Amend Policy G3 to:**
  - **Delete “, in consultation with the local community through the local authority,”**
  - **Insert “and/” before “or through” in the penultimate line**

## **Community, Employment and Education**

135. **Policy C1** – This identifies six community facilities where alternative provision should be provided if development proposals would result in their loss alongside support for appropriate development of educational facilities and major development providing additional community facilities.

136. The Policy is intended to complement national planning policy support for the role community facilities play in creating healthy and safe communities and Core Strategy Policy P9.

137. There is evidence supporting inclusion of the six community facilities provided in Appendix F and their location is provided on Map 9. I am content with the justification provided. Appendix F refers to community “*assets*” rather than “*facilities*” and Map 9 additionally includes three public houses which falls into the category of community assets. This introduces a potential ambiguity and I recommend Map 9 shows only the facilities included in Map 9 and Appendix F references community facilities rather than assets. This also removes any potential confusion with identified assets of community value. I also recommend the same names are used for the identified community facilities throughout the Plan and its appendices – Park Dale Hall is a community centre like Woodsley.

138. The intention of Policy C1 is to identify the community facilities where Core Strategy Policy P9 should apply. There are drafting differences between the two policies and I recommend modifications to Policy C1 so it mirrors Policy P9.

139. The evidence base also identifies a relative lack of community facilities in the neighbourhood area and it is appropriate to support their provision as a part of major development. It is not appropriate to specify the approach to consultation in planning policy although this can be encouraged in the supporting text.

140. The approach to supporting development of educational uses is positively drafted and reflects the particular contribution of educational uses to the neighbourhood area.

141. Policy C1 does not meet the Basic Conditions.

- **M24 - Amend Policy C1 to:**
  - Insert “(as identified on Map 9)” after “*services*”
  - Insert “satisfactory” before “*alternative*”
  - Delete “*in consultation with the local community, and*” in Part 3
  - Insert a comma after “*facilities*” in the last line of Part 3
- M25 – Amend Map 9 to include only the community facilities identified in Policy C1
- M26- Amend Appendix F to refer to community facilities rather than community assets throughout
- M27 – Use consistent names for the identified community facilities in Policy C1, Appendix F and throughout the Plan.

142. **Policy E1** – This identifies locations where new employment uses will be supported subject to relevant planning considerations.

143. The locations where employment uses will be supported have been identified through the design and character analysis that informs the Plan. The approach is broadly consistent with that of the Leeds Core Strategy and is positively worded. The effect will be to support employment related development that helps achieve the townscape and other identified outcomes.

144. Policy E1 meets the Basic Conditions.

145. **Policy E2** – This supports small scale mixed uses and educational uses in an identified area along with small scale employment uses in residential areas.

146. The definition of a “*Mix of Uses Area*” in Map 10 is supported by local surveys and evidence and the Policy is intended to support the vitality a mix of business and residential uses provides.

147. Policy C1 provides general support for development of educational uses subject to relevant planning considerations. Policy E2 could be interpreted as limiting this support to identified areas. Little Woodhouse Neighbourhood Forum has indicated this is not the intention and Policy E2 is intended to provide particular support for educational uses in these areas.

148. Policy E2 meets the Basic Conditions.

- [OM11 – Insert “particularly” after “*supported*” in Part 3]

149. **Policy E3** – This supports retention of small convenience shops and identifies groups as shopping parades.

150. The intention of Policy E3 is to identify locations where the provisions of Core Strategy policies P3 and P4 will apply. On request I was provided with a new map detailing the location of Burley Lodge (Woodsley Road) Local Centre, three parades and six individual convenience stores. I recommend this is included in the final Plan along with addresses for the facilities outside the Local Centre to enable their precise location to be determined. The policy drafting should be simplified so it only identifies these as relevant locations for the Core Strategy policies to apply.

151. During my visit to the neighbourhood area I identified an additional convenience store and a restaurant. On request I was informed by Little Woodhouse Neighbourhood Forum that the Plan identifies “*individual small convenience stores, providing necessities for the whole community, rather than isolated takeaways/restaurants*” and that the additional convenience store is likely to be a temporary use. I am content with this response and with the approach taken.

152. Policy E3 does not meet the Basic Conditions.

- **M28 – Replace Policy E3 with “The retention of shopping facilities shown in Map ?? will be supported in accordance with Leeds Core Strategy policies P3 and P4.”**
- M29 – Provide addresses for the facilities identified in the Map showing local shopping facilities which are outside the Local Centre in the supporting text and/or as part of the Map

### **Movement**

153. **Policy M1** – This supports development promoting active travel and seeks evidence on likely routes and green infrastructure improvement opportunities from development likely to generate significant external pedestrian and cycling movement.

154. The Policy is informed by the neighbourhood area’s location near to the city centre, albeit with poor pedestrian and cycling links. A range of potential improvements are identified in the design and character analysis informing the Plan and its placemaking and green infrastructure opportunities.

155. The Policy is positively worded and enabling. It should relate to both the placemaking opportunities identified in Policy HC4 and the green infrastructure opportunities in Policy G1 and reflect the fact these are not “*required*”. The policy drafting can also be improved.

156. Policy M1 does not meet the Basic Conditions.

- **M30 – Amend Policy M1 to:**
  - Replace “*improve*” with “*improving*” in the second line
  - Insert “including within place-making opportunity areas defined by Policy HC4,” before “*applications*” in line six
  - Replace “*as required by*” with “*identified in*” in the final line

## **8. Recommendation and Referendum Area**

157. I am satisfied the Little Woodhouse Neighbourhood Plan meets the Basic Conditions and other requirements subject to the modifications recommended in this report and that it can proceed to a referendum. I have received no representations on the referendum area and recommend it matches that of the Neighbourhood Area. Given the characteristics of the neighbourhood area and the content of the Plan I advise that Leeds City Council will wish to give consideration to the timing of the referendum to support student participation.