

Date: 02 March 2026
Our ref: 539106
Your ref: Little Woodhouse Neighbourhood Plan



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Mr Kwame Steadman
Leeds City Council

BY EMAIL ONLY

npsupport@leeds.gov.uk

Dear Mr Steadman

Little Woodhouse Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 19 January 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.



Neighbourhood Plan Support c/o

Kwame Steadman

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cc: Kwame.Steadman@leeds.gov.uk

Our ref: PL00800989

Your ref:

Telephone 01904 601879

07502 737925

27th February 2026

re: Little Woodhouse Neighbourhood Development Plan Submission

Regulation 16, Neighbourhood Planning (General) Regulations 2012

Dear Neighbourhood Plan Support

Thank you for consulting Historic England on the Submission of the Little Woodhouse Neighbourhood Plan.

We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan. We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum.

Yours sincerely

John Lambe

Historic England, 37 Tanner Row, York YO1 6WP
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John Lambe

Historic Places Adviser

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Leeds City Council,
Merrion House,
110 Merrion Way,
Leeds,
LS2 8BB

Our Ref: UK-70100906

2 March 2026

Dear Sir/Madam,

**REPRESENTATIONS ON THE LITTLE WOODHOUSE NEIGHBOURHOOD PLAN 2025-2033
PRE-EXAMINATION DRAFT v4.**

On behalf of the University of Leeds (The University), we welcome the further opportunity to comment on the emerging Little Woodhouse Neighbourhood Plan (LWNP).

These comments follow previous submissions on behalf of The University made in July 2024 during the pre-submission consultation, these can be viewed in Appendix A. They also follow a meeting with the Neighbourhood Forum in July 2025.

We recognise and welcome the removal of reference to the Clarendon Building as a positive building in the Conservation Area from Map 5 and Appendix A.

However, comments in relation to the Michael Marks Buildings and Policy H3 are maintained and expanded on here. Our request for the addition a new policy (Policy ED1) relating to the University Estate is also maintained and reiterated, particularly given the emergence of a new University Estate Masterplan.

CONTEXT

The previous representation in Appendix A summarises the importance of the University to the regional and national economy. As a large landowner within the Neighbourhood Plan area, the University has significant interest in ensuring the plan supports sustainable development and does not impede the aspirations for the University estate.

Since March 2025 (i.e. following the last round of consultation on the Neighbourhood Plan) the University have been working on their 'Campus Reimagined' project, developing a comprehensive and robust, masterplan framework in conjunction with masterplanners Prior + Partners. The framework will lay out the principles and guidelines for The University's decisions around the planning, development and management of the campus over the next 15 years and beyond. The work on the framework will conclude in Summer 2026, with a more detailed plan of action anticipated towards the end of 2027.

One of the objectives of the masterplan is to enable a financially sustainable, effective and efficient campus, meaning greater investment to enable a better experience for students, staff and visitors, and to support the University's mission.

A strategic part of this framework is the Western Campus where the emerging principles and guidelines suggest it could become an area for the development of student accommodation in the future. The potential of this area to accommodate new student accommodation was noted in our previous comments in connection with Policy H3.

It is acknowledged that, as a result, the draft plan now proposes three new exemption areas where PBSA (Purpose Built Student Accommodation) would also be acceptable – one being the University of Leeds Western Campus.

COMMENTS ON POLICIES OF THE LITTLE WOODHOUSE NEIGHBOURHOOD PLAN PRE-EXAMINATION DRAFT

Policy H3: Purpose-Built Student Accommodation

In principle, the University supports the aspirations of Policy H3, which strives to enhance the health and wellbeing of students and local communities, through improved standards of design. In addition, the three new exemption areas (alongside the main southern area of Little Woodhouse) as shown on Map 4, where PBSA would also be acceptable are welcomed. One of these exemption areas is the University of Leeds Western Campus.

MIX OF USES

The emerging masterplan has reviewed how the Western Campus functions and how it could become a more integral part of the main campus. Consequently, Western Campus is being reviewed through the masterplan framework for a range of uses, but currently (given the timeframe for the delivery of the framework) the predominant use is residential.

However, Policy H3,2b) states that PBSA will be permitted *"within the University of Leeds Western Campus as a minority element in the mix of uses there . . ."*.

In the first instance it should be noted that at present there is not a 'mix of uses' within the University of Leeds Western Campus. This area is almost entirely for University/educational uses. Any new PBSA in this location would be within the existing campus, and therefore within the control and management of the University, unlike the majority of new PBSA development off campus. Any issues such as noise, would therefore be managed by the University directly, just like it is at existing accommodation sited within the University Campus.

The Western Campus is not part of the existing residential area of Little Woodhouse. Therefore, if proposals for the development of new PBSA on Western Campus come forward, it would not undermine the purpose of Policy H3, but could positively contribute to the aspirations of Policy H1. We therefore propose the following amendment:

"

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

b) within the University of Leeds Western Campus as a minority element in the mix of uses there, provided

GREEN SPACE

The second point relates to the wording around green space. Policy H3,2b) permits PBSA 'provided there is no loss of existing green space and any development reflects the existing scale of buildings there'.

However, the comprehensive assessment behind the University's masterplan may require the reshaping, reconfiguring or moving green space across the campus in order to create a financially sustainable, effective and efficient campus fit for the future. This means that whilst there may be some loss of green space in some areas, this will be made up for in other areas of the campus.

We therefore propose the following amendment:

*'provided there is no **net** loss of green space and any development reflects the existing scale of buildings there'.*

This will allow for flexibility in the masterplan whilst protecting green space within the neighbourhood plan. Noting that the University has a track record of actively ensuring it delivers significant biodiversity enhancements with all of its development activity.

EXTEND THE SCOPE OF THE UNIVERSITY OF LEEDS WESTERN CAMPUS PBSA AREA

As per our earlier representations, in our view the whole of the Western Campus should be designated as a PBSA Area on Map 4 including The Liberty and Maurice Keyworth Buildings.

The Maurice Keyworth building is a Grade II Listed Building and as such not likely to be considered for new build PBSA. However they remain suitable for student accommodation through sensitive conversion by the University. Including these buildings within the PBSA area would provide policy support for the sensitive conversion and use of these buildings whilst providing student housing needs.

Due to the location and current use of the buildings it would be more appropriate to secure the area for student accommodation rather than for Class C3 residential development. This would support the University's long-term masterplan framework whilst creating a sustainable way to accommodate students.

We therefore propose that Map 4 at page 18 is amended to extend the yellow box marked 'b' relating to the University of Leeds Western Campus PBSA area and include the whole of the Western Campus including the Liberty and Maurice Keyworth buildings. See the below map.



As previously set out Western Campus is a key focus of the masterplan framework to ensure it becomes a more integral part of the main campus, through sustainable, effective and efficient use of the land.

Western Campus is well-connected, University owned land within the existing University Campus. Arguably it should be the primary location for PBSA. Including the whole of the Western Campus within the PBSA Area provides flexibility to properly masterplan the Campus in the context of all planning policies and the demand for new student bedspaces.

MICHAEL MARKS BUILDING

Map 5 at page 28 highlights the Michael Marks Building (the M&S Archive) on the University of Leeds's Western Campus as a non-designated heritage asset (NDHA), whereas previously it was identified in the pre-submission draft as a positive building.

Policy HC1 sets out the positive characteristics which give the Little Woodhouse Heritage Area its distinctive identify:

- the layout of terraces, villas and other buildings and their relationship to the streets, topography, landscape, views and vistas;
- the scale, form, materials and architectural detail of the 19th century development;
- the original boundary walls and their materials and details; and
- the natural stone setts and flags of the streets and pavements.”

The Michael Marks Building does not exhibit any of the characteristics set out above.

The Michael Marks Building has been categorised as a NDHA in accordance with criteria set out in the grid set out on page 3 of Appendix B. The assessment at page 34, states that the Michael

Marks Building has been given this status due to its architectural interest, group value and historical association.

Regarding its architectural interest, the appraisal describes the building as a cuboid form with dark mirrored vertical panels and brick which 'produce a fractured reflection of the listed buildings across the green space'.

The building is distinct and different from all other buildings within Western Campus and its clear from observing the locality there is no single, cohesive or distinctive style prominent in this locality. There are historic buildings in the immediate area such as the Grade II Listed Building Maurice Keyworth however the Michael Marks Building does not reflect its character or materials.

Beyond Western Campus, the traditional built character of the area is defined with brick and stone however Western Campus is very different and there are a variety of styles that have evolved over time to include more contemporary designs. The Michael Marks Building adopts this more modern architectural design.

In regard to the group value, the Michael Marks Building and buildings around the area of green space do not form a cohesive architectural group. The Michael Marks Building is of a contemporary design and age it appears there is no visual or historical relationship that would justify designation based on group value. Although these buildings are located around a single green space this does not justify a NDHA designation.

Regarding its historic interest, it is noted that the M&S archive is located within the building. However, this association with the Marks & Spencer archive is recent (only relocating to the Michael Marks Building in 2012). Whilst the archive may hold historical significance to Leeds, the connection to the building in this instance is functional rather than historic with the building itself not having any long-standing association with the archive. Therefore, this does not make the building itself historically significant.

Regarding NDHA's it should be noted that the *Planning Practice Guidance on Conserving and Enhancing the Historic Environment* (MHCLG, 2019) states 'a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.'

Given the age of the building and the lack of group value, architectural cohesiveness and historical interest or significance, in our view the building should not be classed as a NDHA.

We therefore object to this categorisation.

Proposed Policy ED1

We previously also proposed an additional policy (ED1: University of Leeds Estate) which would recognise the University's role in the local community and objectives for its estate in the future. The justification and wording of the proposed policy is contained in Appendix A.

The need for a policy which recognises and supports the University is stronger than ever. Higher Education providers continue to face numerous challenges in an uncertain global environment. They must retain the ability to develop their estate in a way that enables them to maintain and strengthen their role in the future. The need for this policy is also underlined by The University's Campus Reimagined programme which is creating their new masterplan framework.

SUMMARY:

The above representations object to the wording of Policy H3, Map 4 and the omission of a Policy ED1 in the Little Woodhouse Neighbourhood Plan 2025-2033 Pre-Examination Draft.

We therefore request the following amendments:

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

The development of purpose-built student accommodation (PBSA) must be located, designed and managed in accordance with the Principles set out in the "PBSA Design Code", including:

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

*b) within the University of Leeds Western Campus ~~as a minority element in the mix of uses there~~, provided there is no **net** loss of existing green space and any development reflects the existing scale of buildings there; or....*

- **Map 4**

The extension of the yellow box marked 'b' relating to the University of Leeds Western Campus PBSA area to include the Liberty and Maurice Keyworth buildings.

- **Map 5 and Appendix B**

Object to the classification of the Michael Marks as a NDHA.

- **Proposed Policy ED 1 - University of Leeds Estate**

University of Leeds is a major landholder within the Little Woodhouse Neighbourhood Plan area.

Support will be given to proposals that improve and enhance the University of Leeds Estate within the Little Woodhouse area, for the benefit of the Local and University Communities, University Staff, and University Students.

Support will be given to proposals that improve the link between the Western Campus and the main campus, in line with the University's masterplan for the wider campus.

Please contact Phillip Dougill at the University of Leeds or me should you have any queries or comments on the requested changes.

Yours faithfully



Julie White
Technical Director - Planning Consultancy

XX/xx

DATE: 20.02.26

BY EMAIL ONLY: npsupport@leeds.gov.uk.

Ref: [Little Woodhouse Neighbourhood Plan](#)- Yorkshire Wildlife Trust Consultation Response

Thank you for consulting Yorkshire Wildlife Trust (YWT) on the Little Woodhouse Neighbourhood Plan (hereafter referred to as the Plan). YWT is a charity committed to securing nature's recovery across Yorkshire and whilst we do not own sites within the Little Woodhouse Neighbourhood Plan Area, we manage a number of nature reserves in and around Leeds and are invested in strengthening ecological networks and habitat connectivity across the wider landscape. In this response, we focus on those sections of the Plan most relevant to biodiversity, ecology, and green and blue infrastructure.

Throughout this response we will also reference our strategic framework, YWT's *Bringing Yorkshire's Nature Back, a Blueprint for Nature's Recovery*¹, published in 2025. Our Blueprint builds upon international guidance and current government policy, outlining how YWT aim to achieve 30% of land in Yorkshire being positively managed for nature by 2030. Almost 200 nations, including the UK, have agreed to the legally binding international targets established in the Kunming-Montreal Global Biodiversity Framework², aiming to effectively conserve and manage at least 30% of land, waters and seas by 2030.

Our Blueprint shows that achieving 30% by 2030, will require a collaborative and cross sectoral effort; therefore, we are encouraging authorities, developers and businesses to consider how they can contribute to this aim. Where appropriate, we highlight where this Plan aligns with our Blueprint objectives and where further ambition could enhance its contribution to nature recovery.

Part 1: Vision and Objectives

We are pleased to see that nature conservation and wildlife are embedded throughout Part 1 of the Plan. It is encouraging that environmental considerations are not confined to a single policy but interwoven across the document. We particularly welcome the Vision for Little Woodhouse (p.9),

¹ [Our Blueprint for nature's recovery | Yorkshire Wildlife Trust](#)

² Kunming-Montreal Global Biodiversity Framework [2030 Targets \(with Guidance Notes\)](#)



which commits to retaining and respecting green spaces and providing an environment that is resilient to climate change. This establishes a strong foundation for delivering biodiversity and climate resilience outcomes. We also support the ecological and environmental emphasis within the eight objectives of the Plan, notably:

- **Green Infrastructure:** committing to improving planting and tree cover, protecting green spaces, and enhancing biodiversity, health, and climate outcomes.
- **Health and Wellbeing:** addressing air pollution and environmental quality while promoting access to healthy environments.
- **Climate Change:** prioritising retrofitting of existing structures in the urban fabric, minimising embodied carbon in new developments, and incorporating nature friendly design features into building design and landscaping.

These objectives strongly align with YWT's Blueprint Objectives, particularly Objective 7: *Building nature-positive communities*, and embedding climate resilience within urban areas.

Design and Development Policies

On pg.32, we welcome reference the environmental objectives of sustainable development within the National Planning Policy Framework (NPPF)³, particularly the commitment to protecting and enhancing the natural environment (para 8(c)).

Policy HLC3 (p.34) describes comprehensive sustainability criteria, including efficient use of resources, provision of appropriate habitats for wildlife, use of passive design systems and water recycling and rainwater capture. We are particularly pleased to see explicit reference to habitat provision for local wildlife and the long-term adaptability of buildings, including the incorporation of wildlife friendly features, such as swift bricks. In addition to those listed, we would recommend that the Plan considers features to aid the connectivity and shelter for ground-dwelling wildlife, such as hedgehogs, to help ensure these species are incorporated into new developments and existing ones being enhanced for biodiversity. For instance, boundaries and barriers should be made permeable, for example with fence panels with hedgehog holes at the base. These measures, if successful, will contribute to climate mitigation while also supporting urban biodiversity in the Neighbourhood Plan Area.

We support **Policy HC4: Placemaking Opportunities** (p.37), particularly the aspiration to introduce more trees through planting projects, pocket parks, and rain gardens along Burley Road and Kirkstall Road, with the intention of creating green corridors in the area. Such measures will help address air pollution, improve ecological connectivity, and enhance the public realm to be a more nature friendly space. This approach clearly demonstrates the intention of nature positive placemaking principles in Little Woodhouse.

³ [National Planning Policy Framework - GOV.UK](https://www.gov.uk/government/policies/national-planning-policy-framework)



Here we also note the alignment with Blueprint Objective 4: *Create new nature-rich landscapes*, as by increasing the opportunity for nature and biodiversity ingress throughout the urban fabric, this Plan could succeed in creating an urban landscape that allows nature to flourish.

We were pleased to see that **Policy HC5** (pg.40), concerning the development proposed at Leeds City College at the Park Lane Campus, appropriately includes commitments to resource efficiency and increasing green infrastructure, alongside wildlife-friendly planting. We encourage that these ambitions be implemented with measurable biodiversity outcomes wherever possible which could be strengthened in subsequent versions of this plan as it develops.

Policy G1: Green Infrastructure Opportunities

We are generally very pleased with the approach to Green Infrastructure (GI). It is evident that GI has been considered from the outset of the Plan's preparation. We welcome the explicit reference to NPPF paragraph 193 regarding protection of irreplaceable habitats (e.g., ancient woodland and veteran trees). While no irreplaceable habitats lie within the Plan area, inclusion of this principle demonstrates a positive and precautionary approach to biodiversity enhancement and nature conservation.

We strongly support recognition of opportunities to connect and strengthen the fragmented Leeds Habitat Network:

"14.3.2 Green infrastructure provides natural habitats and there are opportunities to connect and strengthen the fragmented Leeds Habitat Network within Little Woodhouse (see the Leeds Habitat Network mapping⁴)"

(pg.42, Little Woodhouse NP Pre-Examination draft v4 – 19/11/2025)

Enhancing ecological connectivity in urban areas is essential to achieving landscape-scale nature recovery and aligns directly with YWT's Blueprint Objective 5: *Reconnect wild spaces* and also Objective 7: *Building nature-positive communities*; which we are extremely satisfied to see incorporated into Neighbourhood Plan Policy. The identification of Local Green Corridors through community walkabouts and workshops is particularly encouraging. Community-led green corridor mapping supports the development of nature-positive communities (linking to YWT's Blueprint Objectives) and strengthens local stewardship of the natural environment.

We also support the acknowledgement that green infrastructure integration must respond to scale and context; where space is in shorter supply, whatever can be achieved in the limited space will be done, whereas greater yielding tree planting or SUDs schemes can be integrated into larger schemes:

"The use of the space and contribution to wildlife habitat and corridors. Where possible, street trees should be introduced to define movement networks, improve air quality and contribute to biodiversity."

⁴ Please see the link to the Leeds Habitat Network: [Habitat Network Map](#)



The inclusion of street trees as biodiversity and air quality assets is especially welcome given the urban setting of Little Woodhouse.

Policy G2 – Local Green Spaces and Improving Existing Green Spaces

We note the reference to Local Green Space designation in accordance with NPPF paragraphs 106–107. We draw attention to the forthcoming revisions to the NPPF, where the wording may change from “reasonably close” to “close”. This may require review to ensure alignment with national policy once finalised. That being said, the provisions outlined in this draft appear to be relative to the urban nature of the Neighbourhood Plan Area. The majority of local green spaces are already existing within the communities they serve, requiring enhancements as existing, rather than planning of new locations due to the existing built environment.

We strongly support the recognition of the links between green space and health and well-being. Evidence consistently demonstrates that accessible green space improves both mental and physical health outcomes. The Wildlife Trusts (TWT) produced a report in collaboration with Leeds Beckett University in 2019, *Social Return on Investment analysis of the health and wellbeing impacts of Wildlife Trust programmes*⁵. In paragraph 96, the report published data evidenced findings recognising that access to a network of high-quality open spaces can deliver “*wider benefits for nature and efforts to address climate change*”. If designed and managed well, natural areas can be incorporated into open spaces intended for sports and recreation as well as encouraging wildlife and biodiversity.

Furthermore, including nature rich areas within the accessible network of open spaces is good for mental as well as physical health. Therefore, we are pleased to see that this Plan recognises that ensuring high-quality, accessible green spaces is central to achieving nature positive urban communities.

Projects and Delivery Plan

We welcome chapter 22 and its clarification that certain aims of this Plan, while not planning policies, support delivery of nature friendly objectives outlined in the introduction. Projects supporting Policies G1, G2, and G3, which include tree planting, green infrastructure enhancements along corridors, pocket parks, biodiversity initiatives, tree surveys, and low-maintenance gardens, are ones that YWT encourage. It is reassuring to see identified delivery partners contributing to implementation of biodiversity enhancement and habitat connections throughout the neighbourhood plan area. Community ownership of nature conservation within the wider Leeds metropolitan area is vital for achieving lasting ecological recovery, particularly in urban neighbourhoods.

General Design Guidance & Codes

⁵ [SROI Report FINAL - DIGITAL.pdf](#)



In Part 2 of this plan, we are pleased to see a dedicated Nature Chapter within the Design Guide (Aecom, 2021) and support the clear statement that development should enhance biodiversity wherever possible:

“Any development should enhance biodiversity wherever possible. This will involve restoring and increasing green infrastructure assets, and provision of a clear landscaping scheme to demonstrate how new development will create positive green linkages and contribute to these assets.”

(Pg.78, Little Woodhouse NP Pre-Examination draft v4 – 19/11/2025)

The recommendation to adopt a Biodiversity Net Gain (BNG) approach, for all developments not exempt from statutory BNG, under the Environment Act⁶ is strongly supported by YWT.

Delivering BNG within urban environments is essential to improving habitat connectivity and reversing biodiversity decline. We also support recommendations to incorporate wildlife friendly features in public spaces and private gardens such as the use of native species in planting schemes, particularly tree planting. We are also pleased to see the promotion of Sustainable Drainage Systems (SuDS), including the use of permeable paving and soft landscaping to reduce surface water runoff. This is particularly important when considering the location within Flood Zones 2 and 3 (as part of the neighbourhood plan area lies within these flood zones) in any development design. These measures will contribute to improved water quality, reduced flood risk, enhanced habitat provision, and increased climate resilience.

Conclusion

Overall, YWT is pleased with the strong environmental and ecological focus of the Little Woodhouse Neighbourhood Plan. The integration of biodiversity, green infrastructure, climate resilience, and health throughout the Plan is commendable and aligns well with objectives within our Blueprint for Nature's Recovery. We encourage the Plan to continue its ambition to improve the biodiversity within the neighbourhood plan area and beyond; particularly in strengthening habitat connectivity and ensuring alignment with forthcoming updates to national planning policy.

We thank you again for the opportunity to comment and would welcome continued engagement as the Plan progresses.

Kind regards,

The Planning Team

Yorkshire Wildlife Trust

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⁶ [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#).

