

LITTLE WOODHOUSE NEIGHBOURHOOD PLAN

APPRAISAL OF COMMENTS FROM PRE-SUBMISSION CONSULTATION

KEY:	Leeds City Council	LCC
	YPP (Developer)	YPP
	Luminate (City College)	Luminate
	University of Leeds	UoL
	Historic England	HE

KEY:	Minor or no change involved or agreed	
	Justified disagreement	

SECTION/POLICY	FROM	COMMENT	APPRAISAL	
Introduction (and General Comments)	LCC	<i>A discussion would be welcomed on the best way to make use of the AECOM studies</i>	AECOM documents to be included as: NP Part: General Design Code NP Appendix: Character Appraisal and maps	
	LCC	<i>Note that the Appendices are supplementary and do not form part of the Plan.</i>	Re-arrange documents as Parts and Appendices.	
	LCC	<i>It is considered that the draft Little Woodhouse Neighbourhood Plan meets the Basic Conditions subject to taking account of the comments set out in the Council's response.</i>		
	YPP	<i>It is important to note that the Little Woodhouse area is immediately adjacent to the University of Leeds main city centre campus. It is important that good quality accommodation for students is provided in close proximity to the campus and that the planning system does not unreasonably inhibit the delivery of new accommodation. In recent years, there has been considerable investment in new large scale PBSA schemes particularly in the city centre. It is important that there continues to be a mix of accommodation available including provision of smaller scale, conversion schemes for more mature students and postgraduates which may be outside the city centre. It is also important to note that students generally do not want to rent a 37sqm studio as the rent will too high and they do not require this amount of space for their day to day living. Therefore, student housing providers generally provide studios ranging from 20sqm to 30sqm which is in line with the Council's design standards.</i>	These comments preface specific comments below re Policies H3 and H4	

	YPP	<i>We object to the Preferred Student Housing Area designation with regards to draft Policy H3 as well as parts C and D of draft Policy H4. The representations set out below demonstrate that these proposed designations do not meet the Basic Conditions required as per PPG guidance and should therefore be removed or changed to meet these requirements.</i>	See LCC comments re Basic Conditions compliance above.	
Vision				
	LCC	<i>Suggest 'existing and future residents' to include for example parents at Rosebank who haven't been able to find housing</i>	Agreed. Phrase added	
Objectives				
housing and community	Luminate	<i>It is requested that the wording is amended to include 'student' at bullet point 1 to ensure in line with the spirit of the draft LWNP, that all resident types are considered within the policy, as follows: 'housing and community - to meet the housing aspirations of all our residents, offering a balanced mix of housing stock, catering for all types of households, including younger and older people, families with children and cooperative housing ventures, <u>and students</u>.'</i>	Agreed. Student added	
heritage and character	LCC	<i>Heritage and character objective –consider including a reference to the historic green spaces of the area as well as buildings and streets as this is significance aspect of the historic environment of the area e.g. Hanover Square and Woodhouse Square. Also consider a recognition of the surviving historic planting / trees of the area – this is a cross-over with the green infrastructure objective but recommend explicitly recognising the heritage significance of surviving historic trees and greenscape of the formal squares. Also the need to protect and care for the veteran trees and plan for their managed succession.</i>	Add wording. "heritage and character - to value, protect and restore our heritage architecture, streets and historic landscape of trees and green spaces , and build appreciation of this local community area" Veteran trees now referred to in 14.3.6. Also covered by Project P-G3.	
	LCC H'ways	<i>'Restore our heritage architecture and streets' – please note that any restoration of paved footways, cobbled streets or a mixture will need to be funded, this cannot be funded from the Highway maintenance budgets</i>	This is an objective. It is conservation policy to replace materials like for like where possible in conservation areas. This is also included in Projects (P-M6), which require funding.	
green infrastructure				
community facilities and employment				

movement				
health and well-being				
sustainability				
climate change	LCC	<i>Recommend considering emphasising the embodied carbon benefits of the surviving historic buildings and their adaptability to new uses and potential for sympathetic retrofit to enhance their energy efficiency and also their heritage significance with the use of appropriate materials and detailing - breathability, character and appearance of the hist env. There is substantial Historic England guidance on achieving sympathetic energy efficiency measures in traditional buildings that could be signposted in the relevant chapter.</i>	New paras. 9.3.4 and 10.3.2 Reference added.	
HOUSING				
Policy H1: Aiming for a balanced community	LCC Regen	<i>Housing and community – there is an opportunity for further discussion between the Regeneration Service and the Neighbourhood Forum around aligning our approach to the emergence of new development schemes within the WER</i>	Discussions held. Placemaking policy added including links across Kirkstall Road to align with WER proposals.	
	LCC	<i>Paragraph 3.3.2 - Family households are generally underrepresented within the city centre and fringe areas where there is a much younger population and greater concentration of high rise accommodation than Leeds as a whole. Due to the size and diverse nature of Leeds there will be areas in Leeds where family households dominate. A better comparison would be with other city centre fringe areas such as Holbeck, Burmantofts, Mabgate etc</i>	Agreed we are justified in comparison. Added a para to CS evidence re city centre family housing being promoted, and additional phrase to 3.3.2 providing further justification.	
	LCC	<i>Part a seeks to increase the amount of accommodation for families – it is not clear what criteria should be used. What would be (un)acceptable? Part b seeks to avoid high concentrations of students. How is this defined? Would PBSA (sui generis) be caught by this policy? What concentration would be too great? This policy needs further thought. Perhaps the best approach would be to support H6B but with some additional criteria. H6 is much more detailed than LWNP H1 which only talks about 'encouraging' certain housing types. It may be that H6 provides more protection. H1 may be better as an objective as more detailed policies follow</i>	Conceived as an overarching/strategic policy, with later housing policies providing detail. Also added phrase to 3.3.7, defining a sustainable community to include being well served by social and green infrastructure. Agreed to keep after discussion.	
	Luminate	<i>Remove bracket in final bullet as follows: '...existing communities).'</i>	Typo. Agreed. Changed	
Policy H2: Housing Mix	LCC	<i>Paragraph 4.2.4 - Reference to CS policy H3 should be H4</i>	Agreed. Changed	

	LCC	<i>Paragraph 4.3.1 - This may not be accurate for example, there are residential areas around Lovell Park and Saxton Gardens, The Calls</i>	These are not “historic” – agreed change to “only area continuously occupied by residential development since the Victorian era”	
	LCC	<i>B) Two units is a very low trigger for the policy and this appears to be unreasonable, 4-5 units may be better.</i>	Rawdon NP has a similar policy. Phrase added to 4.3.6 “and echo the requirement in CS for any conversions to include at least one family sized unit.”	
	LCC	<i>C) Any acceptable extension is ambiguous. The conversion of buildings without extensions is supported by national and local policies. Utilising extensions for COU apps may not be something that can be insisted on. Does this relate to both houses and apartment buildings?</i>	Following discussion – change to “plus any proposed extension.”	
	UoL	<i>The University supports the intention of Policy H2 to create a broader housing mix as this could also benefit mature students with families looking to settle in the area along with graduates. However, achieving the standards set, particularly in some types of conversions maybe challenging and unviable. We therefore welcome the flexibility built in through proposed Policy H2(c).</i>	Agreed. See change above	
Policy H3: Purpose-Built Student Accommodation	LCC	<i>Presumably, the reason the PBSA Area is designated is that it is considered suitable for PBSA and a further test to demonstrate that a proposal does not undermine balance of communities is unnecessary? Is there is opportunity for the Policy H3 to use the fine grain understanding of the area to provide more detailed criteria of where PBSA may or may not be acceptable outside of the Preferred PBSA Area? See Core Strategy H6B to avoid duplication. Design guidance is useful. The Council’s draft SPD on HMOs and PBSA may be helpful in quantifying some of the policy expectations, for example room sizes. Suggest a higher trigger point for community facilities e.g. over 250 rooms.</i>	Section 5.3 rewritten to further justify the PBSA area. PBSA area to include Park Lane Campus, Josephs Well and Western Campus Communal spaces are important for student health and well-being, whatever the size of the PBSA. Add para 4.2.4 to PBSA Design Code to ensure extent of communal space conforms to LSS draft SPD.	
	LCC	<i>H3 8: Planning gain can only be sought to make the development acceptable in planning terms by mitigating the adverse impact of a development. There would need to be justification for community benefits in this respect.</i>	Changed to “PBSA Development should demonstrate that there will be a positive benefit to the local community, including provision of shared facilities where possible” (italics indicate additions).	

	LCC	<i>Consider impact of identifying preferred area for PBSA - may lead to imbalance, severance and high concentration within one area.</i>	Impact considered acceptable in view of benefit elsewhere. Argument amplified in the text.	
	LCC	<i>Enhancing health and wellbeing needs to be defined.</i>	Added e.g. to text: space, light, amenity, social interaction. Added footnote reference to BPF report.	
	LCC	<i>Some of the provisions of H4 could apply to H3 and vice versa - could the policies be combined?</i>	They deal with two different types of development, therefore some aspects differ in inclusion/emphasis. However, some wording from H3 has been added to H4.	
	Luminate	<i>Policy H3 and the Appendix 4 PBSA document direct PBSA primarily to the area at Burley Road, but not exclusively. Likewise, this is demonstrated in the Park Lane Design Code document which also recognises PBSA as a potential use within the Park Lane site. For consistency throughout the various NP documents it is therefore required that the policies align. Limited revisions are therefore required to Policy H3 as follows: ‘2 Location: PBSA will normally but not exclusively only be permitted if it is located within the “Preferred PBSA Area” shown on Map 4. Any PBSA development must avoid undermining the balance and well-being of existing residential character and amenity and the loss of existing dwellings suitable for family accommodation.</i>	H3.2 amended to: “Location: PBSA will normally only be permitted if it is located a) within the “Preferred PBSA Area” shown on Map 4; b) within the Park Lane Campus in accordance with the Park Lane Campus Design Code; or c) within the University of Leeds Western Campus as a minority element in the mix of uses there and provided there is no loss of existing green space.”	
	Luminate	<i>A revision is required to bullet point 5. This is because there is an onerous expectation that all new PBSA schemes can be designed for conversion to residential use C3. Many schemes do achieve this but it is not always possible due to varying reasons eg shape and efficiencies of a site. Furthermore it is not a requirement within the NPPF. Omit “PBSA should be designed so that future conversion to residential use (Use Class C3) can be achieved if and when required with the minimum of demolition.”</i>	If it is not possible this needs to be demonstrated as part of the planning application – thus “should” instead of “must”. Adaptability as an aim is included in the Local Plan Update P10-6. and will be carried forward in the Leeds Local Plan 2025. In view of that and our aims to make buildings last, it is important that they can be relatively easily	

			reconfigured to other uses, if the current use becomes unviable. Retain sentence.	
	Luminate	<i>'8 Community benefit: PBSA Development should demonstrate that there will be a positive benefit to the local community through provision of shared facilities <u>where possible</u>.'</i>	Agreed. Amended.	
	UoL	<i>The University's Western Campus is located within the LWNP area. At the time of writing, the University is commissioning new Masterplanning work for the whole of its campus. This will include a review of how the Western Campus functions and how it could become a more integral part of the main campus. Western Campus could act as a gateway to the campus, through better placemaking and new developments or refurbishments, which could include new student accommodation. 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. Issues such as noise would therefore be managed by the University directly.</i> <i>The Western Campus is not part of the existing residential area of Little Woodhouse. Therefore, should 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 amendments:</i> <i>1. Add Western Campus as a Preferred PBSA area.</i>	H3.2 amended to: "Location: PBSA will normally only be permitted if it is located a) within the "Preferred PBSA Area" shown on Map 4; b) within the Park Lane Campus in accordance with the Park Lane Campus Design Code; or c) within the University of Leeds Western Campus as a minority element in the mix of uses there and provided there is no loss of existing green space."	
	UoL	<i>Amend Policy first para: "The development of purpose-built student accommodation must will normally be located, designed and managed in accordance with the principles set out in the "PBSA Design Code""</i>	Disagree. "Normally" is included under 2. Location	
		<i>Amend item 2 in the policy:</i> <i>"2. Location: PBSA will normally only be permitted if it is located within, or immediately adjacent to, the "Preferred PBSA Area" shown on Map 4. Any New PBSA development outside these areas must avoid undermining the balance and well-being of existing residential character and amenity and the loss of existing dwellings suitable for family accommodation."</i>	Alter to: "Any PBSA development should ensure that the character and amenity of any existing nearby residential uses are not adversely affected by it."	
	UoL	<i>As drafted, Policy H3 of the LWNP does not meet the requirements of Basic Condition E, due to its nonconformity with Policy H6(b)(iii) of the Leeds Core Strategy.</i>	The CS wording (as amplified in the text) is to prevent high concentrations adversely affecting residential areas. Any concentration	

			in the Preferred Area is justified as it removes the adverse effects of proximity.	
	YPP	<i>In its current form, draft Policies H3, which designates a Preferred Area for student housing, and parts C and D of Policy H4 have the potential to significantly limit the appropriate conversions of buildings to student accommodation.</i>	H3 designates a preferred area for <u>Purpose Built</u> Student Housing only. One of the objectives of the NP is to bolster C3 housing in the area and restore the balance of a mixed community which is being overwhelmed by student accommodation. Accommodation to C3 standards does not preclude student occupation and can also provide for mature students with families (para 6.3.5 added to text). Most of these buildings were originally built as residential accommodation. Increasingly conversions of such buildings are meeting the H9 Minimum space standards criteria to meet C3 standards even where it is clear that the applicant is looking to appeal to the Student Market.	
	YPP	<i>the designation of a Preferred Student Area under draft Policy H3 would mean that any listed buildings located within the neighbourhood plan boundary but outside of this designation would potentially not be considered appropriate for conversion. This means there is a risk that vacant listed buildings which could otherwise be reused and enhanced could remain vacant. This poses a significant risk to the conservation of the listed buildings within the area of the neighbourhood plan, as without active use and maintenance these buildings would become neglected and deteriorate.</i>	H3 designates a preferred area for <u>Purpose Built</u> Student Housing only. Listed buildings – any building – could be converted to C3 housing.	
	YPP	<i>Locating PBSA developments outside the conservation areas also limits the opportunities for revitalisation and adaptive reuse. Conservation areas benefit from an appropriate mix of uses, including residential, educational, and commercial activities, which contribute to their preservation and enhancement.</i>	H3 designates a preferred area for <u>Purpose Built</u> Student Housing only. It does not affect uses in the rest of the area	

	YPP	<i>As such draft Policy H3 and Policy H4 do not comply with Basic Condition C as the character or appearance of the conservation areas are neither preserved or enhanced.</i>	H3 helps to ensure the enhancement of the conservation areas by preventing an inappropriate scale of new development in them. See LCC view on Basic Conditions above.	
Policy H4: Conversions to student accommodation	LCC	<i>Paragraph 6.3.6 - Care needed using the term 'original' – elements of historic buildings may be of value even if not from the 'original' phase of development. Consider rephrasing – such as '...any work carried out respects the heritage significance of the buildings and their setting'.</i>	Agreed Re-phrased (now) para. 6.3.9.	
	LCC	<i>Criterion e) – external amenity space - May be impossible to achieve for some properties. Exception should be written in to the criterion. Whilst it may be desirable for residents to have access to private outdoor amenity space, it is not an essential amenity. Many conversions will have no opportunity to provide private amenity space and may already have good access to local green spaces. A lot of residential accommodation in cities does not have such access, and it would be difficult to resist proposals to re-use redundant buildings where provision of such access is not physically possible.</i>	Amenity space is important for health and well-being. Also, if such conversions need to show they can become C3, private amenity space would be needed. Added 6.3.7 re importance for students. Added to policy "(e) where the property includes external areas....."	
	LCC	<i>c) The outcome of this appears to exceed the emerging space standards for student accommodation in the draft SPD – suggest removing the words 'without alteration'</i>	Removing the words "without alteration" does have significant consequences, in that it will permit conversions to student housing provided it can be shown that it could later be altered to C3 This is relatively easy to comply with, and as a result would undermine the objectives of the NP to rebalance the housing mix. Retain wording but add further justification in paras. 6.3.2-4 Also, add explanatory paragraph at the front of the policy H4 itself.	
	Luminate	<i>Policy H4 is supported in principle. However, part c) may not be achievable for all sites as it will depend on the structure and floorplates of the existing building that is to be converted. There may be conversions that cannot therefore be designed to allow for a</i>	Removing the words "without alteration" does have significant consequences, in that it will permit	

		<i>future change to use as a dwelling (use class C3). It is therefore required that part c of Policy H4 is deleted.</i>	conversions to student housing provided it can be shown that it could later be altered to C3 This is relatively easy for a developer to comply with, but could undermine the objectives of the NP to rebalance the housing mix, Retain wording but add further justification: see above	
	Luminate	<i>Policy Intentions: This should be amended in line with JLL (Luminate?) comments regarding Policy H4 of the draft LWNP- it should be made clear that the policy encourages capability for other household types where feasible as this may not be the case on all occasions. The policy objective should therefore be amended as follows: 'Ensure that conversions for student use are also capable of use by a variety of other households <u>where possible</u>, to assist in achieving a more balanced community living in good quality, well-designed accommodation.'</i>	This is an important point of principle, both in terms of sustainability and achieving a rebalance. Adaptation should always be possible, and always designed in.	
	UoL	<i>While Policy H4 acknowledges there are no space standards for student accommodation, it seeks to apply space standards for C3 housing to student accommodation through Policy H4(c). Should proposals for the conversion of student accommodation to Use Class C3 dwellings come forward, this would require planning permission and demonstration of compliance with Nationally Described Space Standards (NDSS). The proposed amendment to Policy H4 shown below, would allow for internal alterations to be proposed during a planning application to demonstrate they were capable of conversion to C3 dwellings in compliance with the NDSS. We therefore request an amendment to the policy as follows; "c) individual units of accommodation are designed to be capable of use as dwellings (Use Class C3) which meet the appropriate space standards for dwellings without alteration;"</i>	Removing the words "without alteration" does have significant consequences, in that it will permit conversions to student housing provided it can be shown that it could later be altered to C3 This is relatively easy for a developer to comply with, but could undermine the objectives of the NP to rebalance the housing mix, Retain wording but add further justification: see above. Agreed following meeting with UoL.	
	UoL	<i>The demands for student accommodation in Leeds is complex, and the need for various types of accommodation for students such as postgraduates, mature students, and students with families need to be considered in addition to the more frequent demand for undergraduate accommodation.</i>	Agreed. Expand text to justify need for varied types of accommodation Add: "6.3.5 Moreover, postgraduates, mature students, and students with families need to be considered in	

			addition to the more frequent demand for undergraduate accommodation.”	
	UoL	<i>As drafted Policy H4, does not comply with Basic Condition E, as it is not in general conformity with the Core Strategy.</i>	LCC has given it the OK.	
	YPP	<i>In its current form parts C and D of Policy H4 have the potential to significantly limit the appropriate conversions of buildings to student accommodation.</i>	The requirements in H4 c) and d) do not prevent conversions to student use, but they do ensure c) easy conversion to C3 use later + quality space. Additional justification provided in 6.3	
	YPP	<i>Draft Policy H4 also reduces the flexibility for developers to convert listed buildings to student accommodation. Delivering student housing at Nationally Described Space Standards where the minimum studio size is 37sqm would not cater towards student lifestyles as the studios would be too expensive and a space of this size is not required as students typically prefer to engage in communal areas for socialising. Smaller units would therefore better align with student needs whilst preserving the integrity of listed buildings.</i>	Listed buildings – any building – could be converted to C3 housing. If conversions are designed suitable for C3 use, they can still be used by students sharing.	
	YPP	<i>The restrictions to PBSA development imposed by the Preferred Area as stated within draft Policy H3 would mean that all PBSA is located in an area outside of the conservation areas. As such properties located within the conservation area may become underutilised and remain vacant due to low demand, thereby harming the preservation of the conservation areas</i>	Buildings could be converted to C3 housing without harming the preservation of the conservation area. The NP has demonstrated the demand for C3 housing in the area which is not being met.	
	YPP	<i>As such draft Policy H3 and Policy H4 do not comply with Basic Condition C as the character or appearance of the conservation areas are neither preserved or enhanced.</i>	Controlling the location of PBSA (usually large scale) will reduce their effect on the character and appearance of the conservation areas. See also LCC view on Basic Conditions above.	
	YPP	<i>Part C of draft Policy H4 would essentially require the conversions of buildings for student accommodation to meet Nationally Described Space Standards. As such all studios would have to be a minimum of 37sqm which contradicts the minimum studio size as stated within the draft PBSA SPD and, most importantly, the adopted Policy H9 in the Leeds Core Strategy (2019)</i>	C3 space standards would still allow students to share a dwelling,	

	YPP	<p>Part D of Draft Policy H4 is also not consistent with the Core Strategy and the draft PBSA SPD. Part D policy requires that conversions to student accommodation should include a communal room(s) which can accommodate all occupants and is available to them within the building, unless all the units of accommodation include a separate living room. This is not consistent with the requirements set out within the draft PBSA SPD which states that:</p> <p>“General communal space (e.g. common rooms) should be provided at 1sqm per bedspace (excluding corridors / entrances / foyers / bike stores) as a minimum for all bedspaces including studios”.</p> <p>The SPD’s provision for 1 square metre of communal space per bedspace is designed to ensure that communal areas are proportional to the number of residents and therefore allows the efficient and proportional use of space. This also allows greater flexibility when converting listed buildings for student accommodation without compromising the building’s historical integrity. Also, the provision of a communal room should not be a mandatory requirement as quite often students, in particular mature students, do not need a communal room.</p>	Communal space is important for student interaction. The SPD refers to PBSA which usually accommodate large numbers of students, so that 1 sq.m per bedspace provides a large enough single space whereas smaller conversions covered by H4 would not. But change to “...a communal room accessible to all occupants”.	
	YPP	Draft Policy H4 is therefore not in accordance with the development plan and as such does not comply with Basic Condition E	See LCC comments re Basic Conditions above.	
Policy H5: Houses in Multiple Occupation	LCC	A local understanding of what “High concentration” means would be needed for implementation purposes. Develop criteria for when HMO may or may not be acceptable.	Para 7.3.5 re how use of LCC Design Management (DM) note on HMOs should recognise LWNP rebalancing objectives.	
	LCC	This policy appears weaker than Policy H6 of the Core Strategy - LWNP policy 'encouraged', CS H6 'should'	Alter policy to: CofU to C3 will be snormally be required on site	
Policy H6: Affordable Housing	LCC	There may be a general conformity issue with Core Strategy policy H5 for Build to Rent. This policy allows an off-site contribution without justification.	We do include the proviso “where possible”. It is an encouraging rather than a demanding policy.	
HERITAGE & CHARACTER				
Policy HC1: Little Woodhouse Heritage Area	HE	We consider the documents are of a comprehensive standard and welcome the consideration of a specific Heritage Area, within the Draft Plan Area, as outlined in Policy HC1 – Little Woodhouse Heritage Area.	Agreed	
	LCC	Would it be useful to include something specifically on the potential to restore heritage significance through sympathetic retrofit of historic buildings and improve energy efficiency at the same time?	Agreed. Applies to HA and NDHA. Also link to climate change aspect of HC3.	

			Para 9.3.4 added “Development within the Heritage Area has the potential to enhance the heritage significance of the area through sympathetic retrofit of historic buildings while improving their energy efficiency. (see also paragraph 10.3.2 and policy HC3).”	
	LCC	<i>Policy Intention: As well as controlling new development I think the policy intention is also about recognising and valuing the heritage and character of the area as an end in itself and the opportunities to enhance the area’s heritage significance including through the restoration mentioned in the objective and actions identified in the Heritage Area Appraisal. Consider rewording to widen the policy intention and reflect the full aim of the heritage and character objective.</i>	Agreed. Change policy intention to: “To ensure that new development within the Little Woodhouse Heritage Area recognises, respects and values the heritage and character of the area’s architecture, streets and landscape, and that applicants understand its heritage significance and the opportunities to protect, restore and enhance it”	
	LCC	<i>Paragraph 9.2 - A brief intro to the concept of ‘heritage areas’ would be useful.</i>	Amend 2nd sentence of para 9.3.3 to “Together with the conservation areas these further areas are, for convenience, identified as the Little Woodhouse Heritage Area, and the following policy applies to that whole area.”	
	LCC	<i>Paragraph 9.3 - NDHAs are part of the justification and evidence base for identifying the heritage area – recommend mentioning here and signposting to next section for full details. Consider showing the boundaries of the 3 designated conservation areas (CAs) on the heritage map</i>	Agreed. Add phrase to 9.3.3: “...identifying further areas containing non-designated heritage assets the setting of which is worthy of area protection (see paragraphs 10.1.1 et seq”	
	LCC	<i>Policy HC1: Suggest ‘preserve and enhance’ rather than ‘respect’ to reflect national policy. Suggest referring specifically to historic green spaces e.g. the squares/mature</i>	Extract from Holbeck Examiner’s report re similar policy:	

		<p>trees. Note that harm to heritage assets can be balanced by public benefit as stated in NPPF.</p>	<p><i>"The effect of Policy H1 is to require development in the defined area to "preserve or enhance" its character as if it were all designated as a Conservation Area. As a result the Policy does not meet the Basic Conditions and a more nuanced approach is required which recognises some of the proposed area lies within a Conservation Area and some without."</i></p> <p>Agreed to retain wording. No change Added bullet point to HC1 re green spaces etc</p>	
	LCC	<p><i>Policy HC1: "Development within and within the setting of the Little Woodhouse Heritage Area (as defined on the Policies Map)..." suggest change to "Development within the Little Woodhouse Heritage Area (as defined on the Policies Map) and it's setting..."</i></p>	<p>Agreed. Changed</p>	
	LCC	<p><i>As written, the policy does not appear to add any further detail or understanding to assessing applications for heritage related proposals than the existing adopted policy and legislation</i></p>	<p>Disagree. The Heritage Area (apart from the parts in the CAs), does not fall under any existing policies or legislation. The policy also highlights specific characteristics of LW (though not exclusively). It also emphasises the importance of Heritage in this specific area.</p> <p>Agreed with LCC. No change</p>	
	UoL	<p>Precis of initial argument: Defining a "Heritage Area" which is not a Conservation Area could devalue the concept of a Conservation Area.</p> <p><i>Areas of the Little Woodhouse Heritage Area outside of the Conservation Areas could, subject to meeting the criteria for a NDHA, be designated as such and LWNP Policies HC1 and HC2 amended to reflect this, rather than seeking to align the requirements with that of a designated Conservation Area</i></p>	<p>A NP does not have the authority to designate conservation areas. However, the HA Appraisal has shown that the extensions to the existing conservation areas are worthy of special consideration equivalent to that of conservation areas. For clarity, amend 2nd sentence of para 9.3.3 to "Together</p>	

			with the conservation areas these further areas are, for convenience, identified as the Little Woodhouse Heritage Area, and the following policy applies to that whole area.”	
	UoL	<p><i>Map 5 highlights the Michael Marks Building and Clarendon Building on the University of Leeds’s Western Campus as Positive Buildings in the Conservation Area (CA). Neither the Michael Marks Building nor the Clarendon Building exhibit any of the characteristics set out [as positive characteristics in HC1]. The Michael Marks Building opened its doors to the public in March 2012, and exhibits modern architectural features such as distinctive cladding and clean lines. The Clarendon Building is also a modern style building, featuring grey cladding and extensive horizontal glazing. It is not clear from the evidence available the criteria used to categorise The Michael Marks Building and the Clarendon Building as Positive Buildings in the Conservation Area. Neither building exhibits any of the positive characteristics identified in Policy HC1. We therefore object to their categorisation as Positive Buildings in the Conservation Area at this time.</i></p>	<p>Para 10.3.1 now includes the full criteria for inclusion as advised by Historic England. Amongst those are architectural interest and group value, both of which these buildings exhibit.</p> <p>Agreed with UoL and LCC to omit Clarence building but include Marks building.</p> <p>Include this quote in the text: “Heritage is not about the past. It’s about what we value enough to preserve for the future” (Owen Hopkins)</p>	
	UoL	<p><i>Basic Condition A requires regard to be had for national policy and advice. Map 5 of the LWNP cannot meet basic Condition A, as the aforementioned buildings do not exhibit any of the special characteristics set out within Policy HC1. We would therefore suggest that the above buildings are removed from Map 5, to ensure that the concept of conservation is not devalued through the broad categorisation of contemporary buildings as positive buildings in the Conservation Area.</i></p> <p><i>Basic Condition E: We suggest that the Heritage Area (Map 5) should be redrawn to replicate the boundaries of the relevant Conservation Areas that overlap with the Neighbourhood Plan Area, in order to create conformity with the strategic policies contained in the development plan for Leeds City Council. Policy HC1 does not have regard to the adopted Conservation Areas and seeks to expand the policy control of the Conservation Areas beyond the existing boundaries. The policy cannot therefore meet basic Condition E.</i></p>	<p>See comments above.</p> <p>All agreed by UoL</p>	
Policy HC2: Non-Designated Heritage Assets	LCC	<i>Paragraph 10.2.1 - Fair to include the rest of NPPF para 209 about balancing harm in decisions</i>	Agreed. Added to 10.2.1 and 10.3.7	

	LCC	<i>Paragraph 10.3.1 - NDHAs should now be identified within CAs not just outside them. Historic England criteria is wider than the three examples provided – recommend referring to the wider criteria. Again harm to NDHAs can be justified – NPPF para 209 ‘balanced judgement’ – the policy should be reflective of this</i>	Wider criteria are included in the Appendix B2. 10.3.1 amended to include full list. 10.3.7 changed to: “Applicants for development affecting a non-designated heritage asset will need to demonstrate their understanding of its local value and significance in order to ensure that any harm caused by the development is carefully weighed in the balance against any positive benefits.”	
	LCC	<i>Paragraph 10.3.2 - Ref to map 6 should be map 5</i>	Agreed. Done	
	LCC	<i>Paragraph 10.3.4 - Heritage statements are required for applications affecting NDHAs – see NPPF para 200 it refers to ‘any heritage assets affected’ which includes NDHAs as well as designated HAs</i>	Agreed . Omitted	
	<u>LCC</u>	<u><i>Policy designates the NDHA - but in terms of the criteria may not add to existing national and local policy</i></u>	Differentiated between NDHAs and Positive Buildings, thus more applicable to the quality range in Little Woodhouse.	
	UoL	<i>The LWNP Pre-Submission Draft Submission Version DPNP does not refer to the criteria used to select the buildings/structures identified as Non-Designated Heritage Assets’ and ‘Positive Buildings with the CA’. Nor is it clear from the evidence base documents the criteria used.</i>	Add to Policy Intention: “(see Appendix B listing them and their assessment for inclusion)” Also footnote to para 10.3.1	
	UoL	<i>Basic Condition A requires regard to be had for national policy and advice. Map 5 of the LWNP and Policy HC2 cannot meet basic Condition A, without the defined criteria used in the categorisation of the NDHA being made clear.</i>	Defined criteria included in App B but now added to 10.3.1	
Map 5 - Heritage	LCC	<i>Consider showing the boundaries of the 3 designated conservation areas (CAs) on the heritage map</i>	Agreed. Map 5 amended	
	LCC	<i>Suggest improvements to the plan resolution and identifying street names</i>	Map 5 enlarged, street names added Resolution increased	
Policy HC3: Design of Development	LCC Design	<i>There may still be opportunities to say more about design aspects and we feel that the best way to consider this would be to meet with the design team before revising the Plan further</i>	Agreed	

	LCC	<i>Policy HC3: Should include the word "normally" here for flexibility where other considerations justify. Several criteria are not design based</i>	When would good design not be a requirement? Includes “where appropriate” All criteria are constituent parts of urban design.	
	Luminate	<i>The LWNP encourages the reuse of buildings wherever possible. Many buildings will be able to convert whilst others are unlikely to due to age, structure and quality of building all of which are often linked. Policy HC3 part Ki, seeks to retain embodied carbon wherever possible. This is encouraged. However, it is not clear what is meant by ‘survey, safety and viability.’ Indeed, whilst survey, safety and viability will be tested by a developer, it should be clear that the policy does not require this information to be presented as part of a planning application requirement. Omit “subject to survey, safety, and viability” and add “where achievable”;</i>	“where possible” is already included, so a “where achievable” would be superfluous. Omit “subject to survey, safety, and viability”	
Policy HC4: Placemaking Opportunities	LCC	<i>Paragraph 12.3.3 - Data obtained from LATP consultation available to use (albeit limited in this location).</i>	Data too limited.	
	LCC	<i>Paragraph 12.3.5 [now 12.3.6] - Need to understand the aspect/sunlight/shade in this location when considering tree streets. Other pocket park/rain garden type interventions may be more applicable.</i>	Added “...trees and other greening measures – pocket parks, rain gardens, as appropriate for the location....”	
	LCC	<i>Paragraph 12.3.6 [now 12.3.7] - Carefully consider current bus routes, highway and parking arrangements to improve and green public realm</i>	Added in that wording to the paragraph	
	LCC	<i>Opportunity to explore greening and public space opportunities beyond trees. Also enhancing connectivity to nearby destinations within and outside the NA</i>	Agreed. Expanded policy to include other greening	
	LCC	<i>Under section 12 concerning Placemaking Opportunities the draft LWNP sets out the importance of Park Lane/Burley Street and of Burley Road/Kirkstall Road corridors. The emerging WER Vision sets out proposed improvement to these corridors and identifies as a key move the creation of safe, legible and attractive points of connectivity to better serve movement to and from the city centre and unlock north-south connectivity across the area.</i>	Para 12.3.4 added with reference footnote to Gov/LCC Vision.	
Policy HC5: Leeds City College – Park Lane Campus	LCC	<i>Paragraph 13.3.3 - Typo: "This engagement has taken the form of design presentations, discussions, workshops, and walkabouts. aimed at..." suggest change to "This engagement has taken the form of design presentations, discussions, workshops, and walkabouts aimed at..."</i>	Agreed. Done	

	LCC	<i>Suggest the principles within the design code are moved into this policy with the design code giving more detail.</i>	Agreed – as PBSA Design Code/Policy	
	Luminate	<i>Typo. Paragraph 13.3.3 Remove comma as follows: ‘...discussions, workshops, and walkabouts.’</i>	Agreed. Done	
Projects:				
P-HC3 Placemaking: Park Lane/Burley St	LCC Regen	<i>strong synergies with the emerging WER Vision and we would welcome further conversations as we progress our shared aspirations</i>	Amended following discussions	
P-HC4 Placemaking: Burley Road/Kirkstall Road corridors	LCC Regen	<i>strong synergies with the emerging WER Vision and we would welcome further conversations as we progress our shared aspirations</i>	Amended following discussions	
Green Infrastructure				
Policy G1: Green Infrastructure Opportunities	LCC	<i>The draft LWNP identifies a series of Local Green Corridors, including three which sit within the WER boundary: Burley Road South Side, Kirkstall Road North Side and North-South pedestrian routes. The Regeneration service is in agreement with these identified corridors and the emerging WER Vision document sets out proposals for improved blue green infrastructure including planting along these Corridors.</i>	Added reference to 14.3.4	
	<u>LCC</u>	<u><i>Policy G1 Green Infrastructure is welcomed but consideration of the updated Leeds Habitat Network and Green Infrastructure mapping as per the emerging Local Plan Update could be referred to: https://experience.arcgis.com/experience/7ffe8b7331754fe89f8f0aaa2b90b167 and in particular the Neighbourhood Plan could look to connect and strengthen the fragmented Leeds Habitat Network across the NP area by identifying “Leeds Habitat Network local extensions” such as the red arrows – by improving those areas for nature (meadows/fruit trees, substantial street trees possibly).</i></u>	Add para 14.3.2	
Policy G2: Local Green Spaces	<u>LCC</u>	<u><i>The policy should lay out what type of development is appropriate on the green spaces (advise following the approach in the NPPF, NPG)</i></u>	Added 15.2.2 and phrase to Policy G2	
	<u>LCC</u>	<u><i>Could be worth adding support for developments which improve the green space functionally of the sites (e.g. pavilions, paths, benches, statues, level access)</i></u>	Added 15.3.4	
Policy G3: Improving Existing Green Spaces	LCC Regen	<i>There are opportunities around Burley Willows for uplift to greenspace. The draft WER Vision also sets out an ambition for greening streets throughout the WER through planting and SUDs.</i>	Included in 16.3.2 Street trees included in Policy G1	
	LCC	<i>When it comes to Green Space and Play provision, it would be worth considering The Council’s Planning Guidance. Green Space Guidance can be found under the link:</i>	Added as Para 16.2.6	

		https://www.leeds.gov.uk/planning/conservation-protection-and-heritage/landscape-planning-and-development		
	LCC	<i>Perhaps an aspiration for links across the Kirkstall Road dual carriageway. The other side (adjacent to the River Aire) is subject to development proposals particularly opposite to Willow Field and Yorkshire Television. Recreational opportunities could transpire including possible access alongside the river.</i>	Referred to in 12.3.5 Placemaking. Add sentence at end of 14.3.4	
	LCC	<i>Thought could be given to how existing green spaces and parks could be upgraded. A sort of wish list (if finance was available). This could then be ready if such opportunities arise. Also these areas provide opportunities for successional planting and bio- diversity features.</i>	16.3.5. Added reference to projects delivery plan	
	LCC	<i>There is a lot of new tree planting in some of the existing green spaces, a lot of which are evidently dead. Such areas could be identified for replanting</i>	Included within project P-G3	
	LCC	<i>The aim is commendable but it appears overly onerous and complicated and would not be an easy policy for planners or developers to use. Conflicts with G4 of the CS.</i>	Add 16.2.7. Amend policy G3 to add "off-site" and change "just" to "should".	
COMMUNITY and EMPLOYMENT				
	UoL	<i>We suggest that the COMMUNITY and EMPLOYMENT section is retitled, to become the COMMUNITY, EMPLOYMENT and EDUCATION section (see additional policy ED1 suggestion below).</i>	Agreed heading change. Add para 2 to Policy C1.	
Policy C1: Community Facilities	LCC	<i>Section 17 of the draft LWNP concerns community facilities. The draft WER Vision recognises the importance of these facilities and proposes a series of community hubs to be developed alongside the development of housing across the WER area.</i>	Add 17.2.2	
	LCC	<i>Last paragraph - This policy appears to apply regardless of whether the proposal is resulting in the loss of an existing facility or not. It appears to go beyond the requirements of CS policy P9 with no evidence to justify the position in relation to other city centre/inner city locations.</i>	Justified by lack of facilities now – see 17.3.3 Includes provisos: "...subject to location and scale, aim to..."	
	LCC	<i>Appears onerous for site owners and goes against the NPPF flexible approach to uses. Includes closed wording. Pubs can be protected under separate community asset legislation. Unclear how the need for pub etc would be demonstrated.</i>	Similar wording to Holbeck NP and CS Policy P9. Remove pubs from list.	
	LCC	<i>Suggest looking and aligning with Policy P9 of the Core Strategy. There are also questions about what a 'sufficient level of need' means locally.</i>	Similar wording to CS P9.	

			Agreed 1st para is not that out of the ordinary for CF policy	
Policy E1: Employment opportunities	LCC	<i>Section 18 covering Employment Opportunities highlights the importance of the creative media sector to the local economy, which is also recognised in the emerging WER Vision as well as the Leeds Inclusive Growth Strategy</i>	Made reference to WER and Inclusive Growth Strategy in 18.2.6	
	LCC	<i>Map 10 and the text of this policy need to be consistent with each other</i>	Agreed. Done	
	Luminate	<i>Map 10 and Policy E1 do not align at E1 part 1 and 2. The policy references Commercial and Light Industrial Areas and Commercial Fringe character areas. However there is no map which shows these areas within the draft NP, nor is there reference or explanation to them within other parts of the draft LWNP. It is therefore not possible to reference the policy to these areas without a map or definition. Either Map 10 should be updated accordingly or a new map created. Furthermore details Commercial and Light Industrial Areas and Commercial Fringe character areas should be set out. If they exist elsewhere in the suite of NP documents, they should be referenced accordingly to connect the information. Until this point, the Policy cannot be accepted.</i>	Map amended.	
	Luminate	<i>Policy E1 part 2 d aims to deliver photo-voltaics on large roof spaces. Indeed this can only occur where feasible, therefore should be worded as such and as follows: d) contribute to renewable energy production by the use of large area roofs for photo-voltaic panels <u>where feasible</u>;</i>	First sentence of Part 2 includes "should aim to", which allows flexibility.	
Policy E2: Employment/Residential mixed use	LCC	<i>Recommend that further thought is given to the title of the policy given the Use Class Order separates employment, residential and mixed use.</i>	In UCO and PDRs regulations, "mixed" is used in relation to a single building. "Mixed Use" for a site or area is used extensively in the CS However, change to "Mix of Uses"	
Policy E3: Local shopping facilities	HE	<i>The Design Guide as part of the Draft Plan is welcomed, in particular with regard to Policy E3. The reference to removing external roller shutters is positive, given the adverse impact external shutters have, in particular shutter boxes as stated in para 20.3.4 Woodsley Road, although para 10.6.6 as referred to, could not be found in the document? In this regard, whilst the reference to Leeds Civic Trust Shopfront Design is very much welcomed, perhaps this could be supported with 'good practice' factual photos of facias/internal roller shutters, particularly perforated with the suggestion of</i>	"10.6.6" is now 11.3.6	

		<i>backlighting too, which adds to the translucency) and included specifically as a Design Guide Document, along with the others in section C, which could benefit the Draft Area as a whole.</i>	The Design Guides are by AECOM and not possible to alter but the point is covered by 20.3.3	
	LCC	<i>Class A1 is replaced by Class E which includes a much wider range of uses. Perhaps refer to Class E(a)?</i>	Agreed. Change to Class E(a)	
	LCC	<i>Retention of shopping parade should have a criteria based policy.</i>	Intention is that these local facilities be retained in their status as local centre and shopping parades, subject to CS P3 and P4, as outlined in 20.2.2. Add sentence to 20.3.1 pointing out their value + change Policy E3 wording.	
Map 10 Employment	LCC	<i>Map 10 and the text of this policy need to be consistent with each other</i>	Added "Commercial and Light Industrial, PBSA and Commercial Fringe character areas" to the Map	
Additional Policy ED1	UoL	<p><i>The University would like to propose the addition of a specific policy which recognises the University's role in the local community and objectives for its estate in the future.</i></p> <p><i>"Policy ED 1 - University of Leeds Estate</i></p> <p><i>University of Leeds is a major landholder within the Little Woodhouse Neighbourhood Plan area.</i></p> <p><i>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.</i></p> <p><i>Support will be given to proposals that improve the link between the Western Campus and the main campus, in line with the University's contiguous strategy for the wider campus."</i></p> <p>UoL have prepared text justifying such a policy, included in their submission.</p>	<p>Complete new policy could require additional public consultation.</p> <p>Following meeting with UoL, agreed change of section title to include Education, additional para 2 in policy E2, and 19.3.8</p>	
MOVEMENT				
Policy M1: Safe Movement	LCC Regen	<i>The draft WER vision sets out options for improving connectivity into the city centre along Burley Road and Kirkstall Road as well as north-south connections into Little Woodhouse.</i>	Add sentence to 21.3.7	

	LCC Highways	<i>Opportunity to reference Healthy Streets approach to local centres like Woodsley Road (footpath widening, public realm, strategic signage, LCWIP etc), mobility hub and better connectivity to key local destinations and well as the City Centre</i>	Added bullet point on Woodsley Road to 21.3.3 + footnote references to LCC transport policy	
	LCC	<i>Review existing and future ped crossing provision in areas of high footfall, near the college, university residential, hospitals but also key local centres like Woodsley Road.</i>	Added to Project P-M5 – Traffic problems.	
	LCC	<i>Paragraph 21.3.4 concerns movement into the city centre via Woodhouse Square and the emerging plans for a new city centre park adjoining Great George Street bridge through the Innovation Arc. A separate piece of work has been commissioned by the Regeneration service and is being developed by Mott MacDonald, looking at Infrastructure across the Innovation Arc. This will develop plans for improvements to active travel routes leading from Woodhouse Square to Great George Street.</i>	Too soon to make a specific reference to the LCC work.	
	LCC	<i>Review potential to promote north south bus routes to connect Burley Road and Moorland Road and Royal Park Road.</i>	Included in Projects (P-M1)	
PROJECTS and DELIVERY PLAN				
	LCC	<i>strong synergies with the emerging WER Vision and we would welcome further conversations as we progress our shared aspirations</i>	Discuss further as things progress. No change to NP	
	LCC	<i>We welcome the inclusion of projects in the Neighbourhood Plan and the Delivery Plan. We would recommend that the availability of funding and it recommended that the forum uses the Neighbourhood Plan to bid for funding in the future</i>	22.1.3 and 22.2.1 discuss funding	
APPENDIX C4: PBSA				
Page 3, paragraph c:	Luminate	<i>Typo: "that" should be "than six".</i>	Agreed	
Design Principle PBSA2: Location	Luminate	<i>There is a fundamental misalignment between Policy PBSA2 and the draft LWNP and Park Lane Design Code. The policy sets out that PBSA can only be supported within the PBSA area. However, this is not the case. The PBSA area is a preferred area, not the only area. The wording should therefore be amended to align with the wider policy documents as follows: Delete as follows 'PBSA should only be located within the area shown on the map in fig 2 accompanying this Design Code' And replace with ' PBSA will normally be located within the "Preferred PBSA Area" and in other locations such as the Park Lane Campus where it satisfies the relevant policies set out in the LWNP and Park Lane Design Code.'</i>	H3 and PBSA Design Code now in sync. PBSA Area map amended.	

	UoL	<p>To create consistency with Policy H3, we proposed a slight amendment to the wording of Design Principle PBSA2: Location, as set out below.</p> <p>“The preferred location of new PBSA should only be located within the area <u>is shown on the map in Fig 2 accompanying this Design Code.</u></p> <p>To create consistency with the proposed amendments to Map 4 of the draft plan (PBSA Preferred Area), we would recommend that Figure 2 of Appendix C4 is amended in the same way.</p>	H3 and PBSA Design Code now in sync. PBSA Area map amended.	
Design Principle PBSA5: Design	Luminate	<p>Bullet point 5 encourages green roofs to be provided. This is possible on some schemes and not others due to need for alternative use of the space, structural weight bearing risk and maintenance. Developers seek to include green roofs where possible but flexibility is required. Amended wording is set out as follows:</p> <p>‘Roofs may be visible from above and should be positively designed accordingly. Green roofs should be the norm for all flat roofs <u>where feasible.</u>’</p>	Agreed Add “where feasible”	
	Luminate	<p>Similar to policy H4 of the draft LWNP, LEG supports the ambition to design buildings where possible to allow for adaption to other uses in the future. However, this is not always achievable for varying reasons including size and shape of floorplate, costs etc. It is therefore recommended that the policy allows for flexibility such that developers allow for adaptation only if possible, as follows:</p> <p>Bullet point 15: ‘Buildings should be demonstrably designed at the outset to allow for future adaptation to other uses, if and when required, with minimum structural alteration <u>where feasible.</u>’</p>	Disagree. This is an important point of principle, both in terms of sustainability and achieving a rebalance. Adaptation should always be possible, and always designed in.	
Design Principle PBSA6: Room Design	Luminate	<p>‘At least 20% of rooms should be designed to meet the requirements of M1 volume 2 of Part M of the Building Regulations for ‘wheelchair accessible bedrooms’.’</p> <p>However this does not align with current Building Regulations (see Appendix 1- page 43, paragraph 4.2.4, part g) which requires that ‘at least one wheelchair-accessible bedroom is provided for every 20 bedrooms, or part thereof’. Furthermore, Building Regulations Part M Volume 2 states that PBSA falls under the same category as hotel accommodation. Building Regulations therefore require 5% of bedrooms to comply rather than 20% as proposed in draft Policy PBSA5. The difference is significant and unrealistic. It is therefore proposed that the policy is amended to align with current Building Regulations as follows:</p> <p>‘At least one in 20 bedrooms should be designed to meet the requirements of M1 volume 2 of Part M of the Building Regulations for ‘wheelchair accessible bedrooms’.</p>	Agreed. This was a typo and was intended to align with Building Regs. Change to 5%.	

APPENDIX C5: PARK LANE CAMPUS				
0. Introduction	Luminate	<p><i>Within the opening sentence at paragraph 0.1.1, an amendment is required to clarify the full range of education providers across the site for completeness. This includes both Leeds City College and the University Centre. The sentence should therefore be amended as follows:</i></p> <p><i>‘The Leeds City College Park Lane <u>and University Centre</u> Campus is located in the south-east of the Little Woodhouse Neighbourhood Area, at the junction of Park Lane and Hanover Way.</i></p>	Amended.	
	Luminate	<p><i>Paragraph 0.2.1 The following wording at the end of the paragraph should be removed as not considered relevant as follows:</i></p> <p><i>[Note: this paragraph to be firmed up when policy numbers/titles are fixed]</i></p>	Deleted.	
2. Uses	Luminate	<p><i>Uses 2.1.1: Consideration of student accommodation within the Park Lane Campus should be clearer in that it is acceptable where part of a wider mix of uses across the whole site. The wording should therefore be amended accordingly as current wording says ‘may be considered’, which is not considered decisive enough for developers. The following revision is therefore required as follows:</i></p> <p><i>‘Student accommodation (sui generis). The site is outside the preferred area for purpose-built student accommodation, but the use may <u>can</u> be considered only as part of a wider mix of uses over the whole site.’</i></p> <p><i>This aligns with Principle PL2: Uses, activity and adaptability.</i></p>	Amended.	
Design Principle PL2: Uses, activity and adaptability	Luminate	<p><i>A small typo is identified as follows:</i></p> <p><i>‘Part b iv. Sui Generis: Student accommodation (where is <u>it</u> forms part of a wider mix of uses on the site as a whole.’</i></p>	Amended.	
Design Principle PL8: Resources and climate change	Luminate	<p><i>As per draft LWNP Policy HC3 – Design of Development, it is not clear if evidence at PL8 part d) is required</i></p> <p><i>to demonstrate that consideration has been given to reuse, adaptation or refurbishment of existing buildings. It is therefore requested that the final wording is removed as there is no need to provide supporting evidence of surveys, safety and viability to support a proposal.</i></p> <p><i>‘d) Consideration of reuse, adaptation and refurbishment of existing buildings, in part or in full subject to survey, safety and viability.’</i></p>	As per Policy HC3, “where possible” is included at the top of the Principle, so can omit phrase as suggested	

Design Principle PL10: Lifespan	Luminate	<p><i>It is suggested the word 'upkept' is replaced with 'maintained' in the final bullet of the policy to provide a better flow within the sentence as follows:</i></p> <p><i>d) In view of the prime location, it is expected that design will be simple and interesting to enable it to function, be cherished and be upkeep maintained in the long term.</i></p>	Better wording. Amended	
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Aug 2025