

# 16 July 2014

16 July 2014  
09:32

## Further X-Ex of Mr Walker

Insp	Mr Foren - how long X-ex?
CF	All being well, Not more than half hour.
Insp	Very well
CF	I represent A660 Council, residents along the route. Have you walked the route?
TW	Yes
CF	Hyde Park Corner, montage page 29 of Mr Walker's Proof.
TW	The best one is doc B7 p.19  16 July 2014 Video recording started: 09:35 16 July 2014
CF	Removing the hoardings is positive and improves the gateway to the town?
TW	Yes
CF	Those wishing to keep them is a minority view?
Tw	Yes.
CF	Have been there 34 years and certainly I want to remove them. Are you saying they are part of te accepted view?
TW	Yes
CF	You take removal of these as a positive but seem to say it will become less of an eyesore over time. Trying to have it both ways?
TW	Trees lost. Different to having something ugly.
CF	Is it your case that the poles and wires will become part of the accepted view [9:38].
TW	Yes. Can be anything from 20 to 40 metres apart and quite a lot of flexibility, Sometimes it is better to have even spacing and sometimes not.
CF	Technical limits to that flexibility?
TW	Yes. Not a new feature in city townscape in Europe. Leeds will be in good company. Lots of very attractive cities have been able to integrate OLE into them. Not an unattractive feature. Florence, Nottingham.
CF	Earlier it was established that in Rome the Roman authorities do regard them as an eyesore and want ones with batteries. I don't recall seeing trolleybuses in Florence in architecturally sensitive areas.
TW	They've recently completed a tram section in Florence. Don't know about Rome, maybe not where there is really ancient archaeology.
CF	You don't seem [???]. Para 5.44 you move straight onto Hyde Park Coner. Fields between the 2 places, I couldn't find any commentary about those 2 fields.
TW	Well we've certainly covered those fields in the Townscape Assessment and I'm sure I mention them in my conclusion and we do acknowledge that there are negative impacts on both of the character areas including the fields.
CF	Can you say off-hand where?
TW	Let me find it.... [long pause] [9:43]

Insp	Sorry, Mr Foren have you seen it?
CF	I may have missed it, but haven't?
Insp	You are giving Mr Walker a chance?
CF	Yes this isn't a trick.
TW	At the end of the day my proo chapter 5 is a summary of what's in the Townscape/Landscape VIA. If you look at 5.8 I set out character areas where there will be an adverse effect.
CF	It features in list but there's no commentary. In parts of your proof you talk in detail about what's there and what will compensate it.
TW	I talk about it at 5.21
CF	Not very muc about it?
TW	Can't agree with that. At length at 5.21, 5.22, 5.23, 5.24. And also the T/LVIA.
CF	Not in your Proof?
TW	It is in the Proof.
CF	Let's go through that....[reads]
TW	I'm talking about both character areas together.
CF	It's yur evidence that combining compensation it's "major adverse" and "moderate adverse". Which is which?
TW	A-08e-1, page 149. Para 4.504 for Character Area N13 "major/moderate adverse".
CF	Construction and operation it says "major" adverse. Then Year 15 "major/moderate". Which applies, major or moderate?
TW	Following our methodology we can have an in-between categorisation.
CF	What are the factors that make a difference between major and moderate?
TW	On third section degree of tree removal and second section there's open space.
CF	The open space will be only a very small fraction of what's to be taken away?
TW	It will be a public space, not a field.
CF	It can still be seen by a large number of people though not many walk across it. A666 doc 108. View from hard standing taken behind St Columba's Church. Can see buildings and that's the old folk's home complex known as Oakfield. It's right isn't it that people can see these fields -from top of any double-decker bus, if resident at Oakfield or Headingley Castle, and if you walk along Headingley Lane can catch glimpses through gaps in the wall?
TW	Yes and we've set out visual impact assessment as distinct from character assessment at p.162 of L/TVIA. We've broken down people living in properties, roads and footpaths. In this case after 15 years because of hedgerows and planting we are expecting the impact to go down to "slight/moderate" which means it is not significant under our methodology.
CF	Does that mean "It does not matter"?
TW	No, that's not true. The idea is to make this process as objective as possible and to reduce the subjectivity.
CF	How can you say pushing 15m of busway across this field is promoting "good environment"?
TW	Not removing all trees, still open character and verdant effect.
CF	Doesn't comply with policy?
TW	Policy: "maintain best possible environment...conserving...renewal of areas of poor quality". NGT has sought to do that and in most parts it is complying. In this particular instance there is some adverse effect and we recognise that. Have sought to mitigate that through replacement trees, hedgerows, replaement stone walls.
CF	You say it's impossible to comply with all policies because sometimes they conflict with each other. But this is particularly important for residents because Headingley's short of green space- have you seen the Council's assessment?
TW	Not seen the document.

CF	No other green space -last vestige of the Moor?
TW	I'd accept your point on that.
CF	Can't be sustainable- can't carry on doing that if it's the last piece.
TW	There's also a lot of support in NPPF for sustainable infrastructure projects.
Insp	We're still looking at <i>this</i> policy and you're straying off the question.
TW	Okay. Well I still think this development is trying to protect a good environment and will open it up to public space and has been identified in development plans for infrastructure projects.
CF	You are attempting to do your best to mitigate the damage but it must be doomed to failure mustn't it?
TW	I don't accept the terminology and don't think I can take this further.
CF	No photomontage of Belle Isle Circus?
TW	No.
CF	I accept you cannot do one for every metre but in the South Belle Isle Circus is important?
W	Open space.
CF	An oasis?
W	Open and windswept- wouldn't describe it as an oasis.
CF	No description in your Proof of impacts on Belle Isle Circus.
W	Because we didn't consider it significant adverse. Only concentrated on significant impacts otherwise would have been 193 pages long.
CF	In ordinary language, you say it "isn't important"?
W	No I wouldn't say that- can take you to LVIA that explains the methodology.
CF	Destroys the integrity of the site.
W	No.
Insp	You do mention it in Proof [8. something]
CF	No assessment there whether major or moderate adverse.
W	No - the detail is in the LVIA and it wasn't significant adverse.
CF	This didn't make the cut for the proof?
W	No.
CF	No further Qs.
Insp	Mr McKinnon - you said you needed 2 hrs?
BMcK	Yes -have taken the morning off work.
	Montages Annex A to the big LTVIA- A-08e and B-37-2
	Page 195 of LVIA, table 4.81. This gives the landscape baseline conditions in Character Area N17. Could you explain to me please the relation between Hyde Park Corner, Woodhouse Moor, Cinder Moor, Monument Moor?
TW	Generally, part of a wide area of greenspace in this part of the City. Woodhouse Moor on the other side of the road from Cinder Moor is the higher quality area and the main road forms an axial route.
McK	You say Cinder Moor is the opposite side of the road from Woodhouse Moor?
TW	I think it's generally known as Hyde Park, some call it Cinder Moor?
McK	Who calls it Hyde Park? Where is a document that calls it Hyde Park?
TW	I used to when I was a student.
McK	Couldn't trouble yourself to find out the name of the park? You say "tree lined boulevard in Hyde Park".

TW	We all know where we are talking about.
McK	The Insp is not a Leeds man and it sows confusion. What is the name of the Park?
TW	I know it as Woodhouse Moor, Monument Moor and Cinder Moor
McK	Do you know the name of the Park?
TW	Aren't you denying reality here?
Insp	Where is this going? Why don't you say what you consider the park is called and see if he acknowledges that?
McK	Whole Park is called Woodhouse Moor. And Hyde Park is a residential area not a park. When you refer to "tree lined pathways within Hyde Park" what is the inspector to make of it?
TW	Well tree lined streets on Hyde Park. TVIA isn't always efficient and OS maps don't always show the exact names of places within towns.
McK	Are you aware that Cinder Moor gets its name from its surface cinders?
TW	I would guess that's how it gets its name. I think it's hardcore now not cinders.
McK	Cinders are a traditional surface for football pitches?
TW	Will defer to your superior knowledge
McK	Aware that shown on OS Maps of 1940s as a football pitch?
TW	No
McK	Aware that the area you describe as poor gravelly area was the base for the Festival of Britain?
TW	No.
McK	Table on p.196 - uses phrase "hard standing" and implies these areas are car parks?
TW	No I don't think it does.
McK	That's the definition of "hard standing".
Insp	Where did you look that up?
McK	Several online dictionaries e.g. Collins.
McK	Would you agree Mr Walker that the inspector shouldn't take from your use of the term "hard standing" that you mean car parking?
Insp	I wouldn't have done. I have done many planning inquiries and am aware hard standing isn't just used for car parking.
McK	Final section of the table - "dominated by a heavily used linear transport route". Isn't the essential character that of a park?
TW	I think you are just quoting one line of our description...
McK	Aren't you saying that the main character is the road?
TW	I don't think so - we are clear that the area is known as Woodhouse Moor. This particular Character Area doesn't just cover the Moor but we can identify the area in the Appendix to the LVIA- A-08f - page 208 is the best page.
McK	Nothing about views onto the Moor?
TW	You can then see how we've broken down the receptors, people and their set out users of Woodhouse Moor and Monument Moor's amenity users,
McK	That's as far as it goes isn't it.
Insp	Page number?
TW	Page 202. A standard approach across this document.
McK	Para 4.677 you list views and they are all views from the road.
	Turn to GVIA 2nd Edn.
	Were you aware that there was a sheltered housing facility at Pottery [???] which provides a pleasant view and it's a LB.

TW	We grouped residential buildings into one category. Couldn't list individual buildings across the whole of NGT - has to be proportionate or the document would be unwieldy. We have grouped together residential receptors everywhere. That follows standard practice.
McK	4.679 of LVIA you give what is claimed to be the "baseline key view" -linear view along Woodhouse Lane".
TW	That's right.
McK	Do you have any view of the spectacular view of the Parkinson Building as seen across the Moor?
TW	No - I think it's perfectly valid to call that [Woodhouse Lane] a key view as a awful lot of people
McK	Para 7.33 of GVIA- states, "other receptors...people travelling through the landscape" are lower down in the scale.
TW	That part of the guidance is assessing the sensitivity of the visual receptors which we use. We look at the size of the change and then arrive at the significance of the effects. Not talking about the views.
McK	We're talking about why choosing the views. You chose that view because of all the people using the Lane rather than, you think it more important than the views across the Moor.
TW	It leads up to one of the iconic buildings in Leeds and it's a key view.
McK	Now you are saying "a" key view. In that document the landscape assessment says "the" key view. Don't seem even to have considered it.
TW	No we have considered the visual receptors from Woodhouse Moor and Monument Moor.
McK	Seem to be saying the road is more important than the park?
TW	No I don't think you can take that from our assessment.
McK	Wouldn't it have been better to take a photograph of the view from the Moor so the Insp could decide which was the key view?
TW	Well we can't take every view. Photo 101, 102, 97 are all photos from east of Woodhouse Lane. I think we have shown plenty of views from that area to help people understand the character of the area.
McK	At para 7.15 of PoE you say it would refresh the Moor with planting. And in Chief you say you wanted to preserve the integrity of the boulevard of the street, so off-road section. Again, treating preserving the street as more important than preserving the park?
TW	Previous optioneering showed that if NGT ran on the highway it would have meant widening the highway at this point. We thought it better to relocate NGT rather than create significantly varying kerb lines - better to recreate the avenue and put the busway along Monument Moor. We recognised that it impinges on Monument Moor and proposed improvements. Would be nice to work them up in more detail with yourselves.
McK	Your answer is "yes"- boulevard more important?
TW	You are trying to impose a black and white answer when it is more complex. Trying to incorporate improvements. We're also looking at the road alignment. If we'd put an extra lane to accommodate NGT it would still have impinged on the park.
McK	No, it would have impinged on the highway as the boulevard forms part of the highway?
TW	That's right.
McK	Para 4.24. It's in the interests of the Promoters to downplay the importance of Woodhouse Moor isn't it?
TW	Don't agree with that- I think you're seeing a conspiracy when there isn't one.
McK	Do you agree it would be preferable to choose a route that doesn't affect the more sensitive receptors at para 7.32 of GVLIA not para 7.33 less sensitive receptors?
TW	No- we followed the guidance for doing the assessment We've also chosen an alignment.
McK	You said you'd chosen the route to preserve the views of people driving into town?

TW	No- I said we'd selected that viewpoint.
McK	This idea to go across the Monument Moor wasn't your decision was it?
TW	It was part of a team.
McL	Mr Smith told us it was about future-proofing?
TW	That was about traffic. Where to put the route was
McK	7.49 page 95 of GVLA. A trolleybus with cables would be an obtrusive element in the view?
TW	Does change the view you're right but wouldn't describe it as particularly high quality. Half is actually tarmac or high surface. In character effects you have to look at the overall benefits to the Moor and not just the adverse effects at one particular point.
McK	Second bullet point p.96, 7.49. Did you know that the Meanwood Valley Trail and the NW Leeds Country Parks and Greenways Trail both begin on Monument Moor?
TW	Yes I think I did know that - start beyond the statue.
McK	Neither are mentioned in the TVIA?
TW	Can't recall, if not then a minor omission that would not change the conclusions.
McK	People who walk along trails generally appreciate the landscape?
TW	Yes, as do people who walk along the pavement at this location.
McK	High sensitivity receptors?
TW	No. We generally defined residential users as high sensitivity, recreational users as medium sensitivity and road users as low sensitivity.
McK	Third bullet point - changes affecting large number of users. Did you know Woodhouse Moor is most intensively used park in the city - 3m users per year?
TW	I'll take your word for it. What you've got to understand is these guidelines cover a whole range of scenarios- power line or power station. Here we're talking about some gantries and a bus lane running along an existing road corridor primarily and our assessment reflects that.
McK	You refer to the part of Monument Moor that the NGT will be running across as a "Road corridor"?
TW	No but an urban area. Not in a highly attractive landscape that's a wilderness landscape where change from infrastructure is going to be that significant.
McK	Raglan Road "slight beneficial" and Cathcart St "slight adverse" - shown as different impacts but no real difference is there? Page 201 table
TW	I approved this work and helped edit it but it was a team of surveyors that did it. Without standing there again it's hard to know. Raglan Road has a steep bank that probably helps shield it. I don't know the minutiae here. You're going to drag me through every view and question it but at the end of the day whether slight adverse or slight adverse they are not significant. We are proposing clear stemmed trees like a lollipop so you would get views through. The type of detail about species of trees would be something nice to work up with the Friends and could be a nice contribution to Parks for People or Heritage Lottery. If NGT were to work in a collaborative way with the Friends we could achieve a lot more on its own.
McK	We have been open to talk to the promoters and still are. In the winter, you would see the gantries and wires?
TW	Yes but distantly, the houses are not abutting the route- the frontages of these houses are 85m away on Cathcart Street, 90m. Raglan Road does start to get closer.
McK	Para 4.670 on page 198 and para 4.671 - a contradiction there. Would the wildflowers be planted on the gravel area or the other side?
TW	The current proposal, and we're talking wildflowers in the speckled area.
McK	The speckled area is not on the gravel is it?
TW	The amenity grass is.
McK	Not what it says: "the wildflowers and amenity grass".
TW	We're splitting hairs here. Turning the scrappy gravel to amenity grass, planting trees around

	it and combining it with wildflowers to give it more of the character of the other side.
McK	You describe the trees as both a boulevard and a screen. 2 different things?
TW	Well, appropriate to have clear stems but will also have a screening effect on the OLE.
McK	People walking along the pavement will clearly be able to see the trolleybus track?
TW	They will but will help to screen the OLE. And there is also a proposal to plant a native hedge.
Insp	What height will that be?
TW	Could be any height.
Insp	What height should it be?
TW	At this location it should be kept low. I would say 1m or 1.2m.
Insp	Can you find a convenient moment to break?
MK	Okay. Para 5.11 of GVIA (p.44) says "add-on" such as screen planting likely to be least successful.
TW	Yes- first action is to avoid any impacts at all and then the next course of action is mitigate those that occur. You are suggesting that the planting isn't appropriate or is "just cosmetic" but the paragraph goes on to say it should be seen as part of the overall process. It seems to contradict itself. I think here there is a really good logic to putting in avenue planting as we are reinforcing the weak side of Woodhouse Lane.
MK	No contradiction - saying unlikely to be successful but if you are doing it, do it as well as you can?
TW	Let's not be too obsessed by that particular detail - I'm still convinced that the landscape strategy is the correct one.
McK	The gravel is laid on top of an air raid shelter. Not a good location for grass?
TW	Would depend how deep the air raid shelter is. It's a detailed design issue. How deep is it?
McK	You've not looked into it?
TW	Not aware it's something that's been looked into. Sure it can be resolved. [11.17]. It should be looked into before men and machines start doing things on that site.
Insp	Adjourn till 11:30.
11.32	
McK	Says will "reinforce connection between Marsden Statute and Queen Victoria Memorial". The statue sits at crossing paths?
TW	Yes and will continue to do so.
McK	But there's a hedge shown.
TW	There's a hedge shown on the plan and a gap between it.
McK	We were told earlier that the hedge was meant to deter people from crossing the trolleybus track?
TW	It is but not at this location a physical barrier - we've shown a crossing here.
McK	So it's important to have a physical barrier along the Moor but not everywhere? No need for a physical barrier is there if you've a gap.
TW	I think the approach is a sensible one - we've shown a gap in it. A visual barrier and a gap here. We've come up with a design solution that we think is appropriate.
McK	Paras 201-202 you say the impact on road users would be negligible. True that gantries and OLE is visible?
TW	Yes
McK	It will create a visual split between upper and lower parts of Woodhouse Lane?
TW	No - not a ground-level feature and will not split the Moor in two.
McK	Will look very odd won't it?
TW	We're not denying it will be visible in the townscape. To an extent the OLE poles read line

	street lights and it is the wiring that is the new element in the townscape.
McK	You have placed great importance on the impact on the boulevard yet the unity of the boulevard is being destroyed - not OLE going all the way along but runs halfway and then stopping.
TW	That's correct. It does stop and come off halfway. We've put in planting and NGT runs adjacent to large trees where there is a pronounced avenue but at the other point there are fewer existing trees and where there are no existing trees we are planting new trees..
McK	Mr Jones established the importance you place on Year 15 so should we look at Year 15? You are saying that we've currently already got two parts of Woodhouse Lane that look different but by Year 15 you will create an odd effect with 2 parts of a boulevard.
TW	I think it's the trees that will be the dominant feature.
<ck	Annex A to the TLVIA photo 101. Are you really claiming that the trolleybus will create an improvement in the Monument? [4.711 of Landscape Assessment, p.207]
TW	We're talking about a different character area here.
McK	Yes I don't understand why the same physical features are referred to in 2 character areas.
TW	This is just a description of the mitigation in relation to the adverse effects at this point and how it will help settle the stretch down into the landscape and mitigate impacts of NGT.
McK	This hedge between 1 and 1.2m high will be very close to the monument- 2 or 3 yards?
TW	Not that close. If you scale it off the drawings, at the closest point 7 or 8 metres from the monument.
McK	Quite close isn't it?
TW	Relative to what?
McK	Will interfere with the viewing of the monument.
TW	Will depend on how high the hedge is and how it is managed and that could be decided later. Could be as low as 800mm or higher- could be managed to whatever height everybody feels comfortable with. I would say about a metre would be right- wouldn't want it 1.8m high - would retain open views of the statue which is a high statue.
McK	The view at 101 is the view from lower part of the Moor but your proposal is a diagonal row of trees - they are going to obscure that view?
TW	No- we're not planting trees to restrict views. That photo is close.
McK	Can you please explain to me how you will be able to see the Parkinson Building when you've got that row of trees from Rampart Road and the lower part of Monument Moor?
TW	Well those trees may restrict the view but that's not a protected view. My feeling is that Monument Moor is too open and doesn't have enough enclosure- because it doesn't have that parkland verdant character it feels too open and windswept. I would feel it was better to plant the trees. It's an aesthetic and value judgment. If Friends of Woodhouse Moor wanted a different scheme of planting that is a detail that could be worked on later on - all of the landscaping is subject to a planning condition.
McK	The path on the right of Photo 100 in Annex A to TVIA is obliterated isn't it by NGT?
TW	Yes the path on the left is retained.
McK	Not referred to in TVIA?
TW	I think it is on page 198. I don't really follow your point- we're showing where parts will be resurfaced and the existing steps and where refurbished.
McK	People can't just read this in isolation and have to read everything?
TW	They have to look at the plans.
McK	From a distance, reinforced grass will look like grass
TW	Yes.
McK	Close-up will see the plastic mesh.
TW	Yes. We're talking about replacing gravel. Are you suggesting there's a better solution. We

	are trying to improve the park and the parks officers suggested it was the best solution.
McK	The reinforced grass is to replace a grass area not a gravel area. For occasional parking you can park on grass anyway?
TW	Not when soft or wet grass- if there is a circus with heavy wagons.
McK	It has been used for that once and the Friends have been given an assurance that it won't happen again so there is no need for reinforced grass.
Insp	An assurance by whom?
McK	By Councillor Dobson who is in charge of parks and recreation.
Insp	If you are going to rely on that then you will need some quite substantial evidence.
TW	If there is no longer a need then I am sure my client Metro would be happy not to spend money on reinforced grass.
McK	Para 4.664 says of the reinforced grass at Year 1, will have medium adverse effects. Doesn't make sense for reinforced grass to have adverse effects in Year 1 but become mitigation by Year 15?
TW	At this point it's describing all the adverse effects not just the reinforcement. If the Friends don't want to upgrade the surfacing and it's not required then I'm sure the detailed design could be changed.
McK	You wouldn't expect to find a wildflower in a Victorian park would you?
TW	I think there is a good aesthetic debate to be had. I don't think it's a completely alien thing. A matter of detailed design. For us it seemed a good way for enlivening Woodhouse Moor and biodiversity gains. If you are opposed to wildflower meadows then this could be altered.
Insp	It seems this could be altered a lot- I thought these are the plans being put forward. When looking at this scheme, what should the SoS be looking at?
TW	He should be looking at these plans but I'm saying there could be flexibility later on in how they are implemented.
Insp	For this inquiry we have to work on these details don't we?
TW	Yes the details are shown here.
Insp	Just wanted to clarify that.
McK	Says "streetscape will be coordinated" to minimise street clutter. But there will be a tripling of the existing poles along Woodhouse Lane won't there - more street clutter?
TW	Well it's possible to rationalise signing and combine it with street poles and the lighting as well. That's how you rationalise the street furniture that arises from NGT.
McK	Para 2.30 of GVLIA 2nd Edn. Woodhouse Moor wasn't recognised as a designated landscape was it?
TW	Table 4.81 recognised CA and Listed monuments. And designated public open space. We assessed it as medium sensitivity.
McK	The GVIA say "more likely to be sensitive" but you say it can be "medium"
TW	Page 174 of A-08f. On the key, Woodhouse Moor is not a Registered Park and Garden. It shows the listed structures within the park and the areas requiring improvement within the CA- the hard surfaced area. It is not a Registered Park and Garden.
McK	You said it's a designated green space and part of a conservation area but still just medium sensitivity?
TW	That was the view we took at the time and I think that's right- mainly because of the condition of Woodhouse Moor.
McK	GVIA para 2.34 says it is important to consider the views of others. The TVIA doesn't refer to opinions of others, does it?
TW	No -trying to be objective and important not to be influenced by others.
McK	Not following the guidelines then?
TW	Well read the whole paragraph out. [reads] -I think it sets out what I said but acknowledge

	that we haven't built into the assessment views. Would be extremely difficult to do that for what is a long piece of infrastructure.
McK	If Monument Moor was shared space, would be no need for hedges.
TW	Not proposed to be shared space but I think it's the right solution. Grass track doesn't read like a road. Shared space is where you have vehicles and pedestrians and it's changing the emphasis so pedestrians feel more comfortable. I feel this approach is right to play down the importance of the busway with a grass track and where it comes to an area with takeaways and shops move to shared space.
McK	You think it's right to give pedestrians more rights on an existing road but where pedestrians have complete rights to take that away?
TW	You are suggesting a hard surface pedestrians could cross and I don't think that would be appropriate.
McK	Page 26 of Core Doc B-7-2. At para 8.70 of PoE you claim alterations would create a more attractive and accessible gateway to Monument Moor overall. This photo looks like a 6-lane freeway?
TW	Um can we compare that with the view of the existing please [previous photo]? We have 5 lanes of traffic. We propose a similar amount of transport infrastructure, upgrade the surfacing and create what I consider to be an attractive space in front of the shops. The existing view is a highway dominated view.
McK	My question to you was, "does this look like a 6 lane freeway". We have 6 vehicles in a row. You say an attractive gateway?
TW	There are 4 lanes here, 6 lanes at the moment and we're trying to break that down by having a shared space where the bus is. I think it is an improvement.
McK	Why are the trees shown behind the trolleybus identical when we know trees will need to be cut down to make way for the trolleybus stop?
TW	Actually we think only 2 trees are at risk. These are trees where special measures are needed to ensure they are retained. The design retains all these trees but 2 will require special measures to make sure they are retained. And 2 trees are removed.
McK	But the "after" photo shows it as identical.
TW	It will largely be. There is 1 tree removed which is shown as removed on the montage.
McK	Where? [points out]
TW	The overall impression is correct. You can see the new tree planting on the montages.
Insp	Move on please.
RW	No need for parties to put every point on landscape - every view - if there's a fundamental point, say methodology that's different.
Insp	If you are trying to clarify things rather than putting a case then you could do so outside the inquiry.
	I am concerned you've had 2 hours and some of this is very detailed.
RW	Two and a quarter [12:20- not quite right!]
McK	You say "pedestrian dominated" but still have cars there?
TW	Yes the aim is to change it from an area where it is car dominated.
McK	It's a no-through road so already pedestrian dominated?
TW	Well currently it reads like a road.
McK	Well if you look at the "after" photo does that look different?
TW	I think it does - not tarmac with white lines, more like the pavement.
McK	Photos 310 and 301A at B-7-2 (p.24). You told Mr Jones that trees can overhang cables but how would the young trees ever grow high enough to do that without obstructing the cables?
TW	Well a case of mangling the tree - will be 4 or 5 metres and the crown lifting process can start to ensure they are considerably above the OLE.

McK	The gantries will be seen but if had been placed on the other side of the track they wouldn't have been so visible?
TW	Yes that's a good point.
McK	No-one suggested that?
TW	No
McK	You can't see any reason why they couldn't be on the other side?
TW	I'm not an OLE designer but there would be aesthetic merit in putting them n the other side of the road.
McK	Not the sort of "sensitive siting" referred to in GVIA?
TW	I'm sure it does say that.
McK	Is it because Woodhouse Moor doesn't matter that the gantries are not on the other side of the track?
TW	No. The detailed design of where the poles go has yet to be determined and will have to take into account a whole range of factors.
McK	No decision has been made on tree species?
TW	No- not determined and would be the subject of detailed designs. It's a proposed condition that the landscaping design be approved by the Council and their parks and landscape officers would have an input.
McK	Photo 311 p.25 and 312: where are the streetlights?
TW	It's proposed we combine the lighting and the poles which is subject to detailed design which I think would be a positive thing.
McK	Are you aware there was no proposal for Supertram to run across Monument Moor?
TW	I think you are correct.
McK	The original trams didn't run across Monument Moor?
TW	I'll take your word for it.
McK	Would you agree that if it ran down the main carriageway, a single pole in the central reservation could hold both cables?
TW	Difficult to do that because it's a 4-lane carriageway and NGT would tend to use the gutter carriageway and it would be extremely difficult to have a cantilever that spanned 2 lanes. It would be more sensible I should think to have 2 rows along each side.
McK	Regarding West Park the proposal is for the trolleybus to run down the outside lanes so effectively in the centre- I don't know, are the cables there suspended from either side or in the centre?
TW	At Lawnswood the current thinking is, subject to detailed design is - p.9 - 2 poles either side with the catenary running between them. Whether it would be possible to have a single pole with double cantilever I don't know - not sure I have a view on it. It is possible to have a catenary without spanning the whole carriageway. There are lots of highway reasons why that's not possible [at Woodhouse Moor] - I'm sure you've spoken to Mr Smith on it. [12:32].
McK	You would accept that the principle of running public transport across Woodhouse Moor has not been established?
TW	Well I said "broadly" follows the road and there are deviations.
McK	You at para 3.10 refer to iteration of design. Where in the business case do you consider landscape impacts?
TW	I don't have intimate knowledge of those docs - they are not docs I have had any significant input into.
McK	At para 3.19 of PoE you say that since submission of TWAO applicn further changes have been made. Isn't the case that the landscape design has always been a response to the engineering design?
TW	No not the case - have been in contact with Motts and it's been a 2 way street - at times we've

	had to push the landscape impacts hard - not just colouring in green the bits around the engineering. Leant from each other.
Insp	Did you have any input into the choice of the trolleybus or was that the one you had to work with?
TW	No it was still a "soft" proposal for a trolleybus [2007]- whether guided or unguided and alternatives were assessed in the environmental assessment. The alternative options have been reviewed and we have inputted into those -Low Cost, No-Cost, we inputted into the appraisal process from a landscaping perspective.
McK	Are you the person to answering questions on open space? You've not had input into open space assessment?
TW	No - Sean Flesher's dealt with open space issues.
McK	He dealt with recreation but not the open space issues.
TW	I can help with design and layout but not quantum.
Insp	Has Mr Walton got any idea who can - perhaps Mr Leather?
RW	I'll have a word with Mr McKinnon.
McK	You said about asking for info, but at para 12.35 you mention an investigation has been carried out showing that ditches in Bodington could be upgraded rather than replaced. Which investigation and is that a core doc?
TW	That was when we were seeing whether the sports pitches could be relocated. There was work with Sport England to establish that it was possible to replace the sports pitches at at least 3 separate locations but I can't remember what the document number is.
Insp	That could perhaps be found if it's available.
McK	Thank you Mr Walker.
Insp	I thought I'd have a break...how long does Dawn Carey-Jones need?
DCJ	I'm guessing an hour and a half but depends how long the answers take, maybe less.
Insp	We'll have an hour's break and resume at quarter to two.
	[13:34]
Insp	Inquiry is resumed.
	Now it's Dawn Carey-Jones representing South Headingley Residents' Association.
DCJ	I'll start with some docs in your Proof. In para 4.2 you talk about NPPF and say it sets out 12 core principles. One is always secure high quality design and amenity. Do you think "amenity" is a desirable feature of a thing or place?
TW	Yes and "visual amenity".
DCJ	Aren't the Hyde Park Corner shops a useful amenity that will be lost?
TW	Difficult for me to comment on the retail aspect. They are owned by Metro already and on short term uses. What replaces it, that's principally to accommodate the NGT stop. As a replacement at the moment we're showing a new open space. The realignment of gives space outside 1-3 Victoria Road [?]. I think the triangle formed by Victoria Rd and A660 is quite key but needs improvement. We've shown it is a potential regeneration site to put back shops but at the moment the core proposal is to put open space. It's regrettable that there is a loss of shops but it's essential for smooth running of NGT.
DCJ	It is a loss of amenity- because they are lower-rent, they create variety?
TW	I'm not a property surveyor or economist but they do have an amenity at the moment in townscape terms and character terms as well.
DCJ	The role they play in Hyde Park Corner needs to be taken into account?
TW	They have been taken into acct and the effects of removing them in out LTVIA.
	Desperate need to redo and widen the pavements, to remove the billboards and open up the churchyard. I think the whole triangular block needs pretty drastic improvement. It has a

	poor townscape quality because of the poor condition of the buildings. Since I was a student in Leeds it has been in need of improvement since the 1980s.
DCJ	It was thriving in the 1980s but has fallen into disrepair since purchased by West Yorks Transport Authority in 2001.
TW	I always remember it as neglected in the 1980s.
Insp	Can we move on please rather than reminisce.
DCJ	You refer to DMRB and it says "should respond by thoroughly analysing and responding to" the areas. Should take account of what is at Hyde Park Corner and respond appropriate. Not appropriate to widen roads and make the road the most dominant feature through HPC?
TW	I wouldn't agree that's what we're doing - we're doing all the things that need doing anyway - widening pavements, planting trees, new open spaces. We have analysed the area and divided the route into character areas and described the baseline conditions. We have analysed and responded.
DCJ	I don't think it has been analysed properly but we'll come on to that later. In PoE 5.28 you call it "an important landmark and nodal point". Tight streetscape and "gateway" - removing the buildings, that's taken away?
TW	Don't agree. The buildings are already set back from the road. The existing shops are set away from the enclosure ratio of the streets.
DCJ	Sorry, what do you mean?
TW	The ratio of elevations, the shops are wider here [further south]. The townscape opens out and goes through a narrower point here (to south after crossroads).
DCJ	Other documentation shows the tightness of the townscape is harmed..but you say you don't think the character as a gateway is compromised?
TW	No, I don't think it is.
DCJ	"Roads should integrate not segregate neighbourhoods" - MFS2 - but isn't it twice as wide so separating one side from the other?
TW	Width is wider but there will be crossings. The fact there is a stop here will bring people together.
DCJ	People already come together- bus stop on the road outside LS6 Cafè. But won't be able to see anything there (no.16 Headingley Lane).
TW	At that point we're widening the pavement -yes we're creating a stop there but widening the pavement as well. The shelter doesn't cover the whole footprint of the red rectangle so in effect there is a shelter.
DCJ	I'll come back
Insp	Better to deal with same topic in 1 go.
DCJ	Montages of HPC.
TW	Page 19 of B7.
DCJ	LS6 is the building with the green to the far right of the picture. If you look at Page 20 you see a bus shelter exactly where the tables and chairs usually are on the pavement.
TW	We are widening the road.
DCJ	Who'd want to sit outside looking at a bus shelter? Or stand at a shelter next to people drinking there?
TW	I'd imagine the cafe would be pleased [DCJ: didn't know till last week- not consulted] I'd think it was possible to have both.
DCJ	Not be able to...no nice view down Victoria Road. Not "place-making" is it.
TW	Have to have a stop there- opposite the stop across the road to some degree.
DCJ	Why does there have to be a stop here?
TW	From an operational point of view.
DCJ	You're taking away another bus stop (near Cliffe Road) - currently on the other side near

	Avenue walk.
TW	We've not attempted on the landscape drawings to show where bus stops have moved. Mott Macdonald's the best people to ask where they have gone.
DCJ	The HPC bus stop on that side of the road is opposite Avenue Walk between Woodhouse Road and Cliffe Walk.
TW	I'm not an expert on where bus stops go.
DCJ	But you said there was a need.
TW	That's the NGT stop and you're saying that will replace an existing bus stop.
DCJ	No there's an existing stop.
TW	The plans show blue laybys.
RW	Sir, Engineering Drawing L21. [14:09]
DCJ	Your decision not to put guard rails?
TW	That's a matter for detailed design. My preference would be to remove guard rails. Generally now there is a move away from guard rails.
DCJ	Not shown on the montage. Doesn't make sense. To get across to the NGT /outside LS6, from coming up Hyde Park Road or Victoria Road stop will have to cross 3 roads from LH side of Victoria Road. If coming up RHS you'd have to cross 2- isn't that why the guard rails need to be there?
Insp	Has a decision been made about guide rails?
DCJ	No - where possible we will remove them but it's a mater of detail . [NB another misleading photomontage not the "worst case"]
	Why did you show this particular view?
TW	Would show the main changes.
DCJ	Deliberately chosen the hoardings everyone dislikes in the foreground and don't get a good idea what the impact on characterful buildings would be.
TW	No attempt to hide anything. Seemed it covers a number of key changes.
DCJ	You've got a car that covers a bit of where the demolished shops would be and they're small - can't get impacts there.
TW	Couldn't take photos of every corner on the street- wouldn't be proportionate.
DCJ	Why have you left in the smaller trees that are down as going to be removed?
TW	You're right we've marked them as going to be removed.
DCJ	On M-192-191 it shows all those trees will be removed.
TW	I concede that is maybe a minor mistake. Am pretty sure they are self-set sycamores.
Insp	Maybe he can check why there is a discrepancy.
DCJ	If the trees are healthy do you think they should be removed?
TW	If healthy and not needed for the works might still want to open up the views of St Augustine's Church. Finely balanced.
DCJ	Your montage doesn't show the Church any more visible.
Insp	We'll have to look into that.
DCJ	Why are the trees shown the same size in Year 1 and Year 15?
TW	We haven't show growth of existing trees on montages.
DCJ	In comparison it makes the new trees look bigger.
TW	I think it's a very subtle point.
DCJ	Misleading
TW	You could argue that they have reached their mature height. The key thing is that we have shown the difference in height of the new trees.

DCJ	I was going to ask lots of questions about policies which you say are compliant but it goes against- "sensitivity to townscape, heritage, landscape" and visual receptors.
TW	I don't see any point in going over that again.
DCJ	In terms of visual receptors I don't think they have been characterised properly. A-08e, page 9, Para 2.10 of it. What are "public realm people"?
TW	People on pavements.
DCJ	Should that not be 2 bullets.
TW	No what we've done is group all those types of users as moderate sensitivity.
DCJ	Para 7.32 in GVIA it lists what might be included in the most sensitive receptors. And then it lists other receptors. It has people engaged in outdoor sport and recreation as "other". Wouldn't you agree?
TW	This is only a guide. We are supposed to use our professional judgment. This doc includes development right out into the countryside where yes someone on a footpath would expect to view a rural area. But here we are in an urban environment where people on a footpath would expect to see a busy road.
Insp	You've not set out a reason in the document why you've not kept to what the guidelines said, have you?
TW	I'd need to check whether I set out the logic for it, but that is the reason for it. Certainly the 3rd edition...
Insp	But you've followed the 2nd Edn.
TW	They are a bit blunt the 2nd Edn while we have followed it.
DCJ	In your Proof you said 3rd Edn wouldn't have made a difference. If you can make your own decisions based on character of the area, why haven't you taken into account that people in Hyde Park and Woodhouse have the lowest access to vehicles in Leeds and lowest number of gardens- means they are out of their house and into the landscape with the neighbours- cycle or walk, don't drive to places, and the whole area are extremely sensitive.
Insp	Have you taken into account that. When you arrived at the sensitivities, does it show how that person arrived at them in the document or whether he took that into account?
TW	We haven't taken into account that it's a dense housing area and I'm sure there are many areas that can argue that. The urban area is different to rural area.
Insp	Is that in the guidance? That sensitivity in an urban envt is less sensitive than in a rural area?
TW	I can't find it now. Certainly it's in Guidelines 3. It came out last year.
DCJ	It mentions this in Edn 3?
TW	It mentions making a professional judgment and taking into account different factors but it isn't black or white.
DCJ	You said it wasn't black and white which is why you did that?
TW	The 3rd Edn does give more flexibility to accommodate different circumstances. This is not a turbine in rural areas which is what these have been set up for.
Insp	Covers all development including this one?
TW	Well it's been written
Insp	Where does it say you shouldn't apply this to a road scheme in an urban area. But generally this was set up to cover things not in an urban area if you look at the examples or case studies in the two documents. It's still guidance.
DCJ	Para 5.28 of Proof he says "improve the character of HPC junction" and I want to know why?
Insp	Have you got specific questions?
DCJ	When I went into this with Mr Ward he said he hadn't taken into account character and heritage aspects and don't you also have to take that into account?
Insp	I don't really want to go into more detail on this but can you say where you say Mr Walker hasn't taken into account heritage aspects so he can respond?

DCJ	Page 179 table 4.76 [of A-08e]. 3rd box down, 4th bullet- talks about "cluttered roadway junctions and unattractive advertising hoards". We discussed with Mr Ward about the advertising hoardings being there since 1840s and known as Picadilly Circus. This document is saying those bigger 3 are unattractive not that set isn't it?
TW	Well we should have mentioned and perhaps been clearer at that point. We talk about it being high sensitivity and then degrees of change. We are not being transparent in the way we've set this out but we are being transparent in saying it has adverse effects.
DCJ	Only thing you are saying is unattractive is the cluttered streets and that set of hoardings and the petrol station?
TW	That's why we've given it high sensitivity.
DCJ	Why low adverse after 15 years then?
TW	Well shown as moderate adverse but I say it overstates it.
DCJ	Feature shown as positive in the character assessment and Mr Ward he agreed it was consulted on. Are you using the open space and opening of St Aug's Church as the main improvements?
TW	Yes and road widening and planting. Wider pavement on the crescent as well as recreating walls in sandstone in any new boundaries we're creating. Also the potential to open up access to the Churchyard.
DCJ	Says you <i>are doing</i> that on the plans?
TW	Yes.
DCJ	If you didn't have that would effect be worse? [TW: Yes] [??check 14:40] At DocB12, page 49 (Design Statement - regeneration synergy). The diagram on it pointing to the green space that's been there since 60s or 70s when the shops were demolished for Headingley Bypass scheme, says there opps to redevelop for the temporary green space. So is it a temporary green space then?
TW	Well tricky to explain. Would still be preferable to repair the urban grain. A very difficult site to redevelop. This document isn't part of NGT scheme but showing where there are opps to do more. It was decided that it would be extremely difficult to redevelop but would still be desirable to reinstate the urban grain. So that is not core mitigation because of the difficulty of redeveloping it for retail, that NGT couldn't b responsible. So it is a bit complicated.
DCJ	If taking into acct these open spaces as temporary how can it be mitigation?
TW	Well this is the scheme. If those developments were o come forward they would have to have their own assessment.
DCJ	Could be sold and redeveloped and not necessarily repair the urban grain.
TW	You can't hve your cake and eat it!
DCJ	You're saying / can't have my cake and eat it?
Insp	We're not getting anywhere. Mr Walker has made clear what is intended for that area of open space an I think we can leave it at that now and move on, thank you.
DCJ	You say only "approximately 4" receptors are affected on Victoria Rd. Can you tell when "approximately 4" is less or more than 4?
TW	We've broken receptors into groups and shown them on plans. Listed "03" and "06" as receptors and they are recorded on the table 4.80 on p.185 in A-08e-1. Shown as moderate adverse
DCJ	Can't tell from that table.
TW	That's right, till you look at the plans. 4 for "zero three" and for "zero 6" it covers 9 further houses.
DCJ	Para 5.45 of your Proof you say only 4 receptors.
TW	Yes, "zero 3".
DCJ	Which numbers?
TW	1,3,5.

DCJ	What about 7,9,11 etc?
TW	They have more oblique views and not significant adverse at Year 15.
DCJ	Still looking out down a street that's twice as wide. Right down to no.23 it's looking down a wide main road.
TW	Not at the moment.
DCJ	No, at the moment, a nice view of villas better than a busy main road.
TW	Maybe. A temporary open space.
DCJ	Nos 1,3 and 5 will also look at a temporary space so why are you saying they will be seriously affected then?
TW	Well, er [pause]. Further buildings along ictoria Road are closest to the shops that are being demolished so more likely to experience hat change in view than the houses further down Victoria Road.
DCJ	Right down to no.23 it's looking at demolitions, even 25 and 27.
TW	They are further away and not experiencing the widening of the carriageways in the same way. Beyond that they are just experiencing the demolitions the open space
DCJ	But they're
Insp	I don't want to argue this. You're not going to agree, r Walker's given his view, and you can make your statement later.
DCJ	I'm finished.
Insp	[14:56] short break and Ms Pickering's on next.
[15:12] RW	Landscape Plan Drawing 121, there are 3 trees marked to go on the servce access and also in behind thos e3 trees are some trees to be retained.
Insp	So the montage is correct, but why?
RW	The trees to be removed are the service access to 235. And shown Drawing 21 as G700A, group 700A i A-08i and in the schedule the reason why there are to be felled is "incompatible with scheme alignment". Given as C category trees.
TW	Sir, could I come back on some clarity on some points you wanted clarity on. Para 1.5 of GVIA: "an evolving practice that continues to change to take account of new issues and assesment techniques". Later paras make it a bit clearer. Para 1.11 over the page: "a general overview of non-specific methodology", responsibility to ensure the approach is appropriate to the development being assessed. Helpfully at para 1.12 it says the guidelines are not intended as a prescriptive set of rules.
Insp	Not answered my question where I find the reason why you assigned the sensitivity of the view and particularly para 7.31 and 7.32. Really why the decision was made in terms of that particular type of receptor and whether that was documented in the documentation. I also when you suggested it was for wind turbines that it was also applicable to other development too which you accepted. It does say later on that you should explain how you arrived at the sensitivities in the document whic you might have done but not found it.
TW	I'll have to do some work.
Insp	While I'm on documents another one has not been provided- the Conservation Area Assessments. And the list of statutory objectors that I assume you are working on as well?
RW	Yes - had a bit of a trawl through the archives.
Insp	Ms Pickering did you say 2 hurs?
HP	I said 3 hrs.
Insp	I do want to finish today.
HP	I represent Drummond and Churchwod. 4 categories, Developments and landscape plans, Methodology, trees, and 4th impacts on character areas N9-11 from Shaw Road. I'd like to deal with impacts first then mitigation second. Did you write the LTVIA?
TW	My team did.

HP	You overseeing it?
TW	Yes
HP	Involvement 2007, stopped Oct 2010 and recommenced in July 2012?
TW	Sounds right.
HP	Was the bulk of the fieldwork carried out between 2007 and 2010?
TW	No I think most of the fieldwork was done after the pause?
HP	After July 2012?
TW	That's right.
HP	When completed?
TW	By application 2013.
HP	Mostly on Design Frieze 6 plans?
TW	No- mostly on DF7 though has gone through some iterations since.
HP	The DF7 plans only came out in Oct 2013.
TW	We weren't working in isolation of the design process.
HP	A number changes were made between DF6 and DF7- actually presented Sept 2013.
TW	Yes
HP	Considerable difficulties.
TW	We had to keep up with the changes but that's the way it should be so that the landscape assessment feeds into the changes.
HP	Changes in April 2014?
TW	Quite minor changes to pedestrian crossings and retaining more trees.
HP	These say DF7-4 so 4 iterations between Sept 19th and April?
TW	I'm pretty sure it was DF7 rev3 in Oct 2013 and rev4 is the latest plans now.
HP	Would it be right to describe the plans before this inquiry as outline proposals - several times you've said you could make changes and you've got a meeting next week where the design isn't finalised. People are angry that we've got a design before us that can change again.
TW	There's always some change that can occur within the TWA Order. But I think the plans do have show a good representation and a good level of detail about what the scheme is about.
HP	Well don't know where poles and gantries are going, where fixed to buildings. Don't know and hard to understand the plans in a way that say people know if they will get a pole or gantry in front of their house. We're not in position to give them that info?
TW	Not OLE and gantries, that's true. That's the main area that would be subject to further design.
HP	Aware that public consultation events held up and down A660 in June and July 2013?
TW	Yes
HP	No landscaping plans were available only engineering drawings. And people attending could give no information as they said plans not complete. DF3 not complete so public actually had no idea what the scheme's impact would be on the area?
TW	I wasn't involved in the consultation and can't help you. You're right though that plans continued to change.
HP	Can you assure me that the LVIA as not based on outdated plans as were completed before the plans became available?
TW	No they were aware, we were fully aware of the scheme and the changes. And we focused the LVIA on the areas where there were no changes. Did all the bits that were fixed first and the character areas last where the design had been later fixed. So I can't accept that they were based on earlier plans and deficient.
HP	Can we go back to Woodhouse Moor landscape plans? Does that show the impact, the

	changed plans when they incorporated the boulevard on the LH side or is that the old plan? I might be wrong.
Insp	Is the point that this one is an old plan? If we can look at the latest proposal for the TWAO?
TW	The engineering plans?
Insp	Yes.
HP	There is also the broader point whether people know that the plans have changed. I think it's DF 7 Revision P5.
Insp	We want the latest engineering plan to compare it.
	Does it have to be explored now?
HP	I'd like some reassurance.
Insp	Are there any other areas [apart from Woodhouse NGT Stop] ?
HP	It may be all along the route.
Insp	Are you happy?
TW	I would be confident but it would be quite difficult to sit and "spot the difference" without knowing which particular areas to look at.
RW	I suggest true crossexamination isn't appropriate.
HP	Can I retain a right to come back and ask questions on it whether these are the most up-to-date landscape plans?
TW	These are the latest landscape plans and have responded to the latest engineering g designs. There may be a difference in what they are presenting as they show different tings.
HP	If I have any concerns can I raise them?
RW	Of course.
HP	There's been changes in guidance by Landscape Institute and DfT since this work started?
TW	That's right.
HP	You based it on Edn2 but say in para 5.5 that an updated version was published in April 2013 though you had decided to use the 2002 docs. DF7.3 plans were published in Sept so you had time to take the ne guidance?
TW	Project assessment was already underway?
HP	Guidance doesn't say you have to use the old guidance. Had new plans, could have done it?
TW	Would have been an enormous task. Over 40 character areas so lots of changes.
HP	Quite out of date - I'd like to go through the diffs between blue and purple books. What do you think are the main diffs?
TW	Still character area approach, has to assess sensitivity of receptor and mangniude of change. Stil have to look nat effects in construction and operation. Where the new guidelines vary is they allow more flexibility and other elements such as the permanence of the impacts.
HP	Also more on cumulative impact?
TW	Yes in more detail.
HP	Sustainability of green infrastructure.
TW	Yes but it does say it's part of the landscape - just a new way of lookin at it. How areas of green space link together and a newish concept.
HP	This is quite a green corrisor and would have been useful to look at the impact o green infrastructure.
TW	Don't think would have significantly changed our views.
HP	Also required the histoical and conservation aspects o the landscape.
TW	As does the second edition and we've done that for listed buildings and so on.
HP	Also refers to the ecosystems approach- do you kow about that?

TW	I think I'd need to do some homework - obviously to do with ecology.
HP	Yes- I'll come back to it.
	Your PoE para 5.5. You say, "in my view the latest edition is more balanced and would have resulted in different results in some character areas". This is cryptic and if you had used that guidance the outcome would have been different?
TW	It would have done but I think it would have shown less impact. The old edition tries to tie you to a rigid approach but if you'd applied the new approach you would have had more flexibility which would have moderated the significance/
HP	I don't accept that as otherwise you would have used it.
	New Treasury Green Book and Defra guidance on EIA in February 2012.
TW	You'd have to help me out on that.
HP	I'm surprised about that.
TW	Mott MacDonald were involved and you'd have to ask Mr Leather about the ES overall.
HP	You didn't discuss these guidelines?
TW	Not personally no.
HP	They encouraged taking an ecosystem services approach- doc DCRA107, TAG Unit A3, guidance deals with doing environmental assessments for road schemes. Page 31, Box 1. Has some recommendations in it- if you look at page 34, para 5.3.19, first bullet point. The rationale is that you shouldn't be "averaging" but looking at the greatest adverse impact which should be used, should it not, when you make an assessment- the purpose being not to hide significant adverse effects?
TW	Well I don't think we have hidden adverse effects - are set out at length in the LTVIA process. I can't be sure but I think this is WebTAG guidance for new roads and whether it applies to earlier stages in environmental appraisal or the full assessment. We have used WebTAG appraisal at other areas. I don't like to push it to other witnesses but this is for Mr Leather as it's about overall assessment.
HP	There is a chapter on Landscape and Townscape.
TW	It's for new roads.
HP	No for road schemes.
TW	We have seen this before and used this technique when appraising different options for NGT.
HP	I want to look at the implications of the methodology. Bullet points on p.34. First principle is to go into most adverse category. The principle there is admittedly for a scheme but should be for an area as well. You say 9 areas are subject to significant adverse impact over the area even after the mitigation?
TW	Yes
HP	Therefore, the whole scheme should be considered to be significant adverse.
TW	No- I read it as referring across disciplines.
HP	You say this is a question to refer to Mr Leather on grounds it applies to whole scheme. You are rejecting the principle that this applies to an appraisal of a smaller area?
TW	No, if 9 character areas are moderate adverse, doesn't mean the whole scheme is moderate adverse. It's about looking across disciplines at different effects.
HP	Says any balancing should be used with caution and applied only to slight not moderate impacts?
TW	I'll take your word for it but where we are talking about beneficial effects they are generally confined to slight or moderate positive effects- we're not saying that there will be major benefits from the NGT scheme.
HP	Would you agree that you use out-of-date guidance, may be based on out-of-date plans, and if you had used correct guidelines and plans might have been very different results?
TW	Don't agree with the 3 points. Did use 2nd edition which applied when it started. I'm not

	concerned that it is placed on out of date plans - the assessment was based on the plans released in September and there have been changes since then but to improve the environmental effect. And I think the new guidelines give more flexibility rather than the clunky basis and so the apparent effect would be less.
HP	New guidance gives the professional the advantage over the amateur?
TW	No - flexibility to develop the methodology that reflects the type of development. User of a footpath in an urban area is different to a rural area.
Insp	Where is this going, M Pickering because you were saying he should have used the new guidelines but are now saying they would give an outcome that ignored views of residents?
HP	Not sure what the consequences are but would have thought it was concomitant on using the up-to-date guidance. When you are talking about this amount of money and amount of impacts then if the Promoters in good faith thought the methodology would be better then - I can't be sure what the result would be but we should expect that the professionals would....there was a presentation about 2 years earlier that the guidelines were coming in and the guidelines would have come out after the debate in the profession.
TW	The draft guidelines came out for consultation in 2011 but they did change a lot.
Hp	DocA-08k- Urban Design and Access Statement -produced Sept 2013. Dates fro after DF7 but post-hoc rationalisation because most of the scheme had already bee designed by then?
TW	No. And a lot of the principles were based on Volume 2 of the Supertram design standards, That was our brief in 2007 not to reinvent the wheel and I used the principles in a number of presentations to Members and Officers back in 2008 and 2009 - about minimising clutter, good place-making, making sure the stops were elegantly designed.
HP	Couldn't have been put out for public consultation during July 2013?
TW	Erm but it wasn't a secret. The open spaces group, the civic trust, officers were consulted.
HP	At public meetings, not available. I'm just asking why if it was available and so important why it wasn't there for the public to comment at the consultation events.
TW	It would have to go to whatever witness in dealing with the consultation process. It has been a tortuous process to produce the design and there has been an integration with the engineering plans which were changing.
HP	In Page 11 of design statement. Incompatibility between principles in A-08k (vol 1). "maintain the existing landscape" as against need to be visually prominent to get the modal shift you want.?
TW	There's a degree of tension between the objectives. But I think it's right that both the principles are in there. It is important that the NGT is identified and distinctive whether that's through ticketing colour or maps or livery of vehicles to encourage people to use this investment. At the same time shouldn't completely mask the character o the landscape.
HP	No hierarchy of objectives. Allows you to select and pick the objectives. So-called "quality journey" as against "degraded landscape". Allows you to pick and choose. nUnfair isn't it when we ask you questions?
TW	I think it is important to apply these objectives through the design process. I think it would be quite dangerous to prioritise them.
HP	It might be that some principles are more important for some areas than others, so shouldn't you have identified which principles were important for that area? E.g. Far Headingley business in a degraded area.
TW	I don't accept they are in a degraded environment.
HP	Well in principle it's a methodological issue so far as we are concerned.
TW	Well I think it would be quite dangerous to do so s however then takes on the detailed design process after the inquiry might not come out with the right outcome.
HP	Don't you see that if you don't identify the objectives for each area, we can't have a debate with you because the design objectives are a moving feast in each area? Say in one area they have different demographics.

TW	Yes I can but it would be dangerous.
HP	Why?
TW	We might not arrive at the right solution.
HP	For whom? There's great frustration that there is shifting ground in terms of the methodology.
Insp	Can Mr Walker just address that on shifting methodology?
TW	I don't think there has been shifting methodology. Principles have been consistent and derived from Supertram and we would expect these to be complied with in the future as that is what the planning condition requires.
HP	I'm told this scheme would destroy more trees than any other urban transport scheme in the UK is that right?
TW	I don't know. Have been involved in Luton Dunstable trans-link. That involved felling an enormous no of trees. Difft envt - a disused railway line so most trees were saplings. Also involved in Manchester-Leeds bus link - I appeared as expert witness at its inquiry. That scheme also required enormous amount of tree felling and replacement planting. Those schemes involved replacement tree planting.
HP	This is the greatest destruction of urban trees- would you be surprised at that?
TW	I would be actually given the scale of projects like Edinburgh, Nottingham, Leeds-Manchester Bus Corridor and would be interested to see the statistics.
HP	I'm going to look at Arboriculture Assessment A-08i. The latest detailed arboriculture work was done between Jan and Aug 2013?
TW	Yes - sets out in here it started before then as well. This wasn't a study I personally was in charge of. Mott Macdonald's survey conducted by their arboriculturalists. Para 2.1 says this is an update of a survey done in 2009 and 2010.
HP	But the doc e've got was done between Jan and Aug and published Sept?
TW	Yes.
HP	So the arboricultural assessment was done after the landscape work was done?
TW	No - just like this could not be concluded before we had done the landscape plans.
HP	We saw them on our patch between Jan and August so I'm gonna push you on this.
TW	We were doing our LTVIA at the same time.
HP	I'm going to push you on this- you can't do it until you have the results from this.
TW	It wasn't easy.
HP	Wouldn't t be true that this would significantly weaken the accuracy of your tree assessments [in LTVIA]
TW	We'll have to disagree.
HP	The measurements were done by the track of the trolley bus?
TW	Yes the plan shows the location of the trees. It has the engineering alignment underneath so the decision which trees to remove is not just based on where NT is going but also kerb alignments.
HP	In need a moment to save my notes- losing power- er I've got 9%. You say the landscape plans adhere to BS5837?
TW	The arboricultural assessment hs but the landscape pans haven't. We've obviously taken into account the arboricultural survey.
HP	BS521 - arboricultural results should be shown on landscape plans. Your ones only show outline trees?
TW	Yes but we have detailed tree plans. Not always the practice you would show all tree survey info on landscape plans as well - otherwise plans would get unreadable.
HP	BS at F20, Section called "constraints imposed by existing trees" -5.2.1 - tree survey material should be included on landscape plans. Otherwise can't see which trees are being removed.

TW	Landscape plans do show the trees at risk, ones removed etc.
HP	They are only diagrammatic trees. But it says you should be showing the canopy shape, size etc.
Insp -	Where - doesn't seem to say that at 5.2.1?
HP	Can I check overnight Sir.
HP	Also refers to combating climate change. Large trees contribute thye most to combating climate change?
TW	Ratio of Category A, B C and U is set out in section 6 of my Proof. It's not consistently Category A and B trees that are being felled. More than half are category C or U trees.
HP	A,B and C doesn't necessarily pertain to how large the trees are?
Insp	We did look in detail with Mr Jones. Where is this going?
HP	Obligations to fight climate change. Larger trees contribute more to combatting climate change.
TW	As do growing trees and we are planting new trees.
HP	It's necessary first to see the impact then look at mitigation. When e raise impacts your temptation is always to refer to mitigation. Not what is required by guidance.
TW	No attempt to hide this -we've been quite transparent about it.
HP	Caj you tell me how many protectd trees in Cas will be lost as a result of this scheme?
TW	I can't but if you carry out a planning permission that gives you deemed consent to fell the trees.
HP	Isn't it important to know how many protected trees will be lost?
TW	I don't know if he's counted that. Certainly counted trees with TPOs and also gave greater value to trees in CAs.
HP	Could you do that overnight?
TW	Not overnight- could I put in a request to Mott Macdonald.
	The arboricultural assessment does mention conservation areas.
HP	Nearly the whole of the route is CAs and most trees in CAs
TW	In the northern route, a large number of trees will be in CAs yes.
HP	Large number of groups.
TW	That's right - where the trees are densely packed together.
HP	22 groups to be felled and 3 groups at risk. I've been told you'd make an assessment saying about 10 trees in a group?
TW	I don't think you can generalise. The extent of the groups is shown on the plans.
HP	Mr Turner our arboriculturalist said you could conservatively assume 10 per group. So that's an additional 220 trees over and above the 453?
Insp	673
HP	So we are talking about 673. Most of those trees behind the Arndale Centre that Metro own, why can't they go in and count them?>
TW	Densely packed together. I don't think I can accept that figure is correct. I accept there is uncertainty but not unusual to have groups of trees assessed together in development sites.
HP	In front of our parish hal there is a group with 18 trees.
TW	That group is now being retained since October revision.
HP	If we have 22 groups and that is typical how many more trees are we talking about?
TW	I don't think that's typical. I think on average that it's about 5.
HP	Behind vthe Arndale Centre there is a massive amount of trees there.
Insp	Is it that there are now 21 groups to be felled rather than 22?

TW	UM what I highlighted there was results from the arboricultural survey and the design has been adjusted and now being retained, so yes. If we go back...
Insp	We're not going to gain anything- can we agree it's between 5 and 10?
HP	No.
Insp	Does it make a difference?
HP	It's been completely misleading.
Insp	It seems to me a lot of objectors have only latched onto the loss of indiv trees rather than groups. Been misleading?
TW	It might have been.
Insp	How has it come to be that most people think only going to be 400 trees lost and in fact it's more because of the groups?
TW	I don't know- if you look that group seems to be 2 trees [shows a plan]
HP	If only 2 tree you can count them.
TW	Might be multi-stemmed.
Insp	Can't go further - we're going to have to settle for there being more trees but we don't know quite how many.
	You wee going to introduce some docs?
RW	On Ms Pickering's concern who was shown what, AP130 deals with it in terms - a note from Mr Haskins.
HP	I got my info from that doc.
NC	3 docs to go in. The first one is the response to objections to admission of the further technical appendix to the Hist Env't ES. APP154.
Insp	Can it go on the website.
NC	Sir I'm not going to go through it now - it's been prepared by myself and Mr Walton.
Insp	It seems a thorough response with appendices.
NC	It has - a copy of the advertisement that was placed in the newspaper.
	The other 2 are APP155 and APP 156. One is what Mr Chadwick said he would give on Exclusion of Trolley Vehicle specific constant. And APP156 responds to UK Tram report commissioned for Institute of Transport Studies. Prof Bonsall introduced an extract during X-Ex, and Mr Jones said we had the whole doc already and
Insp	If everyone who objected to B13 can make their own response by the end of this week if you can.
HP	Mr Whitehead, not everyone who objected had a copy. When will it go on the website.
Insp	That's the timetable for that. Tomorrow Mr Natkus is coming in. I don't like to push people but would like your questioning to be done within a reasonable time.
HP	I did ask for 3 hours as I've done the tree work on behalf of a lot of people.
Insp	If not of assistance to me or SoS I'll hurry you on.
	Concern I had about net witness r Speak is that if the new document is submitted what difference that would make to Mr Speak if he was speaking on the previous document.
NC	Mr Speak covers planning and he does express an opinion o the balance to be struck but expresses that view on the basis of evidence given by others and in relation to heritage the doc that the applicant has advertised as env'tl info contains in the main an explanation but the overall concs are not altered and therefore Mr Speak approaches his evidence on the basis of the overall concs unaltered. If a different view is expressed he would have to be brought back. And the person who deals with the adequacy of the environmental info is Mr Leather who should follow him. I' assuming the appearance of Mr Chadwick is fixed come what may. Would be extremely concerned if it was anyone else.
DG	Professor Bonsall wanted to come back on one point on which he was awaiting info.

Insp	[confirms that is right] Mr Jones may have something to say about Mr Speak. [DG: Yes. Difficult to know as we don't yet know what Mr Speak will say].
NC	Mr Walton cannot be here so I will do re-examination.
Claire Randall	I need to leave early tomorrow so would like to get on early...
Insp	You will get on and I will be strict with Ms Pickering.
Inq	Inquiry is adjourned till 10 tomorrow.