


The Historic Environment - Assessment of the Leeds New Generation Transport Environmental Statement

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 Archaeo-Environment Ltd for
the North West Leeds Transport
Forum

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1.0 Summary and Introduction

1.1 The Leeds New Generation Transport Environmental Statement consisting of the Full Environmental Statement (ES) including the supporting Technical Appendix G on the Historic Environment was assessed in order to provide independent advice on the findings of the reports in relation to the historic environment. Some aspects of the historic environment are also covered in Technical Appendix H (TWA0 Document Ref. A-08e-1) and so this was also considered where relevant. Listed Building Consent applications were also viewed for additional information on the approach to identifying the significance of the properties and the impacts of the proposal on that significance. All documents were compiled by Mott Macdonald on behalf of Metro and Leeds City Council and dated September 2013. They were used in conjunction with an internal memo written by Rebecca Remmer of the West Yorkshire Archaeology Advisory Service (WYAAS) dated 7.11.2013 and now available as a document to download from the planning portal.¹ Supporting information was obtained from conservation area appraisals, secondary sources and a site visit on 22 January 2014.

1.2 This report has been written by Caroline Hardie of Archaeo-Environment Ltd. Caroline is an historic environment consultant holding a Master of Arts degree in archaeology from Glasgow University (1985). She is a Member of the Institute for Archaeologists and a Member of the Institute of Historic Building Conservation. She has 29 years of continuous professional experience in the Historic Environment sector. She is the Director of Archaeo-Environment Ltd which she established in 2003 and in that capacity has carried out a range of development related work, has advised local authorities on their heritage assets and worked with local communities to promote their historic environment throughout the UK. She is the author of numerous conservation area appraisals, statements of significance, heritage statements, the heritage chapters of environmental statements and conservation management plans. She is the former Head of Conservation and County Archaeologist for Northumberland County Council (1989-2003) and in that capacity, assessed the heritage implications of developments throughout the county and contributed towards strategic planning documents. She has carried out work for English Heritage on designating monuments (MPP) both as a County Archaeologist and as a consultant. She is an expert advisor and mentor to the Heritage Lottery Fund.

1.3 This assessment has first explored the significance of below ground archaeology and the impact on that significance by the proposal. It has found that standard NPPF procedures to understand significance have not taken place. The NPPF requires that where a development includes a heritage asset with archaeological interest, that the developers should submit an appropriate desk based assessment and, where necessary, a field evaluation (para 128). Policy P11 on Conservation in the Local Development Framework supports this and states that *'Development proposals will be expected to demonstrate a full understanding of historic assets affected' and 'Heritage statements assessing the significance of assets and mitigation measures will be required to be submitted by developers to accompany development proposals.'*

¹ <https://publicaccess.leeds.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=MT0NZKJB0G200> [accessed 020114]

1.4 The ES acknowledges that no fieldwork has taken place and that the impacts on the heritage assets are uncertain (paras 2.26 and 2.29). No pre-determination evaluation has taken place on any archaeological site, despite the sites being referred to as 'significant' by the West Yorkshire Archaeology Advisory Service (WYAAS). The proposed use of a 'Grampian' condition to cover all future mitigation in the form of recording of buildings and everything from geophysical survey to full scale excavation for below ground deposits, is neither enforceable nor reasonable. That is because the archaeological works that will be required cannot be specified in advance (due to a lack of any pre-determination evaluation) and so the developer and future contractors cannot know what resources will be required in order to 'preserve by record' nor will they be able to timetable in an appropriate level of investigation. Budgets will need to be limitless because no agreement can be made in advance which will be based on the significance of the archaeology and the requirements to mitigate against its loss. Ultimately it also means that there is no facility to amend designs in order to protect remains which could be important enough to merit it.

1.5 This assessment also outlines to what extent the ES has under estimated the impact of the proposal on the significance of two sample conservation areas which are considered to be designated heritage assets according to the NPPF Annex 2 p51. By looking at two sample conservation areas, it is clear that:

1. The value of elements which make a positive contribution towards the character of the conservation areas (mostly mature trees, boundary walls and streetscape) have been downplayed despite clear steers from the conservation area appraisals (which are a material consideration in the determination of planning applications) that they are of significance and essential to the character of the area. This has allowed the ES to suggest that impact is less than it would be if the significance of those elements was recognised.
2. That the cumulative impact on each conservation areas as a designated heritage asset has not been considered at all contrary to NPPF guidance para 138
3. That the proposal does not 'conserve and enhance' the conservation areas as sought in NPPF 2012, Planning (Listed Buildings and Conservation Areas) Act 1990 s69 and Policy P11 of the Leeds Local Development Framework Core Strategy (which only seeks to conserve the historic environment and its setting)
4. That there is an over reliance on receptors (residents) getting used to their transformed environments so that it can be referred to as a reduced impact after fifteen years
5. That the transforming effect of the landscape east of St. Chad's has not been considered as the impact on the setting of a grade II* listed building
6. That the deliberate neglect of parts of Woodhouse Moor and some historic building stock blighted by a series of infrastructure proposals has been allowed to play down their significance contrary to NPPF para 130 and thus reducing perceived impact.

1.6 There are inaccuracies in the identification of significant features in the conservation areas, a lack of accurate information on what the proposal entails in detail in the conservation areas and in terms of fixings to listed buildings, there are conflicts between different technical appendices covering the historic environment.

1.7 The proposal cannot meet the standards of the NPPF or even the Local Development Framework in its current form and the proposal conflicts with the desirability to 'conserve and enhance' and for new development to make a positive contribution to local character and distinctiveness as outlined in the NPPF (paras 126 and 131) and the Planning (Listed Buildings and Conservation Areas) Act 1990 s69. The impact on the conservation areas consists of substantial harm which will result in an irreversible change of character: the mature leafy suburbs of north west Leeds will be very different places with a very different character if this proposal goes ahead in its current form.

2.0 Archaeology and significance

2.1 Starting with archaeology, by which we mean, in this instance below ground evidence of earlier human activity and any significant setting (which can be above ground). It is clear from both the ES and the advice from the WYAAS that archaeological deposits are likely to be affected by the route. The WYAAS described these areas as being of 'archaeological significance' in a section heading called 'Statement of Significance',² although there is no assessment of significance upon which to base this statement. However, it can be agreed that there are areas of archaeological potential which are crossed by the route as follows:

1. Putting aside the Bronze Age enclosure hut system which is over 250m away from the Lawnswood Park and Ride, the other Park and Ride facility at Stourton will be located in an area which, according to WYAAS, has been historically documented as a possible medieval iron working site.
2. The section of route proposed at Headingley (and the location of a proposed substation in this area) has the potential to impact upon the possible medieval (and early medieval) manorial complex around Headingley Hall (PRN 6915) according to both the ES (para 3.18 appendix p23) and the advice from WYAAS. Leeds Civic Trust described Headingley Hall as "one of the most historic sites in Leeds." The building has a blue plaque on the wall which states: "The medieval manor house of Headingley almost certainly stood here. The Hall was rebuilt in the 17th Century and 1831-6. Residents included John Killingbeck, Mayor of Leeds 1677, George Hayward, Land Agent of the Earl of Cardigan, and his son George J.W. Hayward, born here 1839, intrepid explorer in Central Asia." This is more information than can be found in the ES. Of more relevance perhaps is the possibility that the medieval manor was moated suggesting waterlogged deposits in the ditch. The hall is surrounded by associated features – the road is the original approach, but kinks in it have been created by selling off the surrounding fields for development in the 1870s. There are records of a hall here in the 14th century when it was granted to Kirkstall Abbey and it may have been a manorial centre from Anglo-Saxon times³. Once it came under the ownership of the abbey it was farmed as a tenancy and this continued after the Dissolution. The complex would consist of more than a hall and we cannot be sure that the 14th century hall was built on the exact same site as an earlier Anglo-Saxon one. The present day building appears to be mainly 17th to 19th

² 'The proposed NGT development scheme will cross through a number of areas of archaeological significance.' In memo dated 7.11.2013 consisting of comments on planning application 13/04318/TWA by Rebecca Remmer

³ Bradford, E 2008 Headingley. 'This Pleasant Rural Village'. Clues to the Past p39.

century, but no survey has taken place to establish what survives and where, although some early features such as the dated stone arch (1649) on the side of the house, are obvious. One would expect any proposal which is in the vicinity of the hall to make some attempt to quantify the risk of uncovering and disturbing archaeological deposits here, particularly as the trolley bus route here will need to be cut into a substantial cutting in order to compensate for the differences in ground levels between the hall and Alma Road where a rather fine Edwardian house is proposed for demolition along with a number of boundary features. One would expect such a 'Statement of Significance' to assess what features in the surroundings are part of the hall's setting. No such work has been carried out here to help inform the planning decision. One would expect that 'one of the most historic sites in Leeds' and one associated with so many notable Leeds residents, would be treated with more consideration in any planning process.

3. According to the ES, remains of early medieval and medieval date could be present within the area of the old village green in the vicinity of St Michael's Church (LB097) and the original Oak Public House (LB089). It claims that any remains of this date are likely to be of 'medium value'. It is not clear how this can be claimed without a statement of significance and an evaluation of the area, neither of which has taken place.
4. A proposed short stretch of new roadway at Hyde Park corner has the potential to impact upon medieval remains (drawing 312694/TD/021-rev P3) according to the WYAAS
5. A further new stretch of road passes through Woodhouse/Monument Moor. This route has the potential to disturb or destroy below ground remains dating to the prehistoric period. In the 1800s Bronze Age barrows were recorded on Woodhouse Moor, and while upstanding remains no longer survive, it is possible that below ground remains are still present in the area, according to the WYAAS. To this, one might add that the name Rampart Road is thought to derive from nearby earthworks which might be the remains of an Iron Age fortification (Wrathmell 2005, 4).
6. Elements of the scheme within Leeds City Centre, such as the City Square bus stop at Mill Hill Chapel (drawing 312694/TD/029-rev P3), may have the potential to disturb below ground remains of a medieval or earlier date, according to the WYAAS. There is the potential for sub-surface remains dating to the 11th and 12th centuries to be present within the zone around Boar Lane and within the southern areas of Briggate to Bridge End (ES3.18 appendix G p23).
7. South of the City Centre, the construction of a substation behind the listed Red Lion pub has the potential to disturb archaeological remains associated with the projected route of a Roman Road.
8. The New Dock NGT bus stop may impact upon the site of the New Dock Foundry which was established in the mid 1840s and has the potential to retain archaeological evidence of the foundry and its development.

2.2 The advice from the WYAAS to the above was as follows:

*"The proposals will involve **significant** [my emphasis] above and below-ground disturbance and there is potential for the proposals to disturb/destroy archaeological remains dating from the prehistoric period, right up to the 19th century."*

2.3 It is clear from the WYAAS response that archaeology is an issue and that this needs to be quantified so that the public, the planners, the developers and future contractors can be sure of what the affect of the proposals will be on that resource.

2.4 The ES has made no attempt to assess whether in each case, any remains are likely to survive in the areas to be disturbed, what their condition and extent is, how deep below the present day ground surface they are, and whether the quality of evidence is sufficiently high to be considered worthy of preservation. As a result, the significance of this below ground evidence is unknown and so the acceptability of any impact cannot be made on an informed basis. The environmental impacts simply cannot be known.

2.5 Furthermore, the archaeological works that will be required cannot be specified in advance and so the developer and future contractors cannot know what resources will be required in order to 'preserve by record' nor will they be able to timetable in an appropriate level of investigation. Budgets will need to be limitless because no agreement can be made in advance which will be based on the significance of the archaeology and the requirements to mitigate against its loss. Ultimately it also means that there is no facility to amend designs in order to protect remains which could be important enough to merit preservation.

2.6 The ES claims that 'the potential for early medieval remains is likely to be low within the city centre environs' (ES3.18 appendix G p23) when discussing the likelihood of 11th and 12th century remains around Boar Lane, Briggate and Bridge End. It is true that archaeological remains within an urban context are often truncated and so may not merit preservation, but they can be complex and require a long programme of excavation, high conservation costs where waterlogged and be very disruptive to project timetables and foundation designs. There are plenty of instances where urban deposits have been preserved in an urban environment. London is full of such examples, most famously the Rose Theatre (medieval), which led to PPG 16 and the need for pre-determination evaluation, or have been so valued, that they have triggered large scale interpretation projects (Jorvik (early medieval) in York for example).

2.7 In order to better assess risk and to ensure that planning decisions are able to find a balance between the significance of an effected heritage asset and the need for development, a standard procedure has been in place since at least 1990 (and before in many places) whereby archaeological evaluation of buried deposits is carried out as part of the design of the development and so is pre-determination. This is akin to carrying out geotechnical ground surveys to make sure that the development is feasible. Importantly, it provides the developer and the planning authority with information on the significance of the below ground deposits so that a planning balance can be obtained (it can result in reasons for refusal, but mostly it results in a redesign) and so that the developer can assess the risk, come up with a level of mitigation that is proportionate to the significance of the heritage asset, quantify the resources required to mitigate, and timetable in the works and thus reduce the risk of costly delays at a later stage. None of this has been carried out as part of the production of an ES and so the information is simply not available on the impact and how that will be mitigated against. Therefore when the ES states that impacts on buried archaeology are 'likely to be moderate adverse' before mitigation and not significant after mitigation (ES paras 7.150 and 7.151), they simply cannot know that.

2.8 Astonishingly, the response of the WYAAS is to agree a standard planning condition, known as the 'Grampian condition' to be attached to any forthcoming consents, despite the scale of the works and the 'significant' disturbance (according to WYAAS). This is an open ended condition that in order to be enforceable, has to be further quantified with a brief or Written Scheme of Investigation outlining what exactly is required. However, because no pre-determination evaluation work has been carried out, no such brief can be written, because nobody knows what will be required. Mitigation could range from the route being moved (unlikely but possibly desirable), to full scale excavation over several years and consequent delays, to a watching brief with some delay or a watching brief with no delays. Works could be carried out in phases with a post determination evaluation first at each site, then a more detailed recording scheme which could involve any of the above at a later date. In effect, the use of this condition is a blank cheque for future archaeological work paid for by the developer, with infinite capacity to delay the project and it removes the right to refuse permission if some of the archaeology turns out to be so important that the local or even national community wish it to be preserved. As at least one or two of these locations relate to the founding of Leeds, this is entirely possible.

3.0 Conservation Areas, Historic buildings and significance

3.1 Turning now to the built environment. The issue of significance and the lack of any understanding of it also affects the ability of planners, the local community and the developers to make informed decisions on the impact of the proposal on historic building stock and the townscape.

3.2 The lack of understanding in the ES Appendix H of what 'significance' means in relation to heritage assets is all too clear in the methodology. This equates national importance to high significance, but the issue is more nuanced than that. In this particular case it has simply failed to address the issue so that no understanding of significance has been obtained.

3.3 The ES defines significance (or value as they also call it) as follows:

High significance	World Heritage Site, Scheduled Monument; Grade I or II* Listed Building; Grade I or II* Registered Park and Garden Undesignated feature or landscape of national or international importance and value
Medium significance	Grade II Listed Building; Grade II Registered Park and Garden; Registered Battlefields; Conservation Areas. Undesignated feature or landscape of county importance and value
Low significance	Sites so badly damaged that too little remains to justify inclusion into a higher grade. The receptor is tolerant of change without detriment to its character. No value Asset is destroyed or has no heritage value.

3.4 This table confuses importance or designation, significance, sensitivity and condition which should be assessed separately so that impact can be understood. For example, Low Significance is a catch all which includes damaged sites (which is condition), assets (or receptors as they refer to them) as being tolerant of change (which is sensitivity) or a destroyed asset (which is condition) or an asset of no value (which is significance or value).

3.5 This is further confused by the attempt to assess significance and impact in the Landscape/Townscape Character and Visual Impact Assessment Technical Appendix which uses significance to describe the impact!

3.6 A more appropriate methodology would determine if heritage sites were designated or not because they are treated differently in the NPPF from non designated sites. It is interesting to note that Conservation Areas and grade II listed buildings have been identified as being of medium significance (in the Technical Appendix H) along with undesignated assets of regional or county importance. These two groups are not treated equally in the NPPF and so should not feature in the same part of the table defining significance. Conservation Areas and grade II listed buildings are *designated heritage assets* to which paragraph 132 of the NPPF applies whereby substantial harm or loss is considered to be exceptional. Undesignated heritage assets are not of equal value and are not covered by para 132, but are covered by paragraph 135 which seeks to find a balance between public benefit and significance and so is a lesser level of protection. The definition of significance is therefore biased by equating some designated assets with undesignated ones which has the result of reducing the level of impact later in the ES. The table should therefore have another level of significance which covers undesignated heritage assets which is higher than sites of no significance or value.

3.7 If we compare the definition of significance as outlined in the NPPF with that used in the technical appendices of the ES, we start to see discrepancies:

'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.' NPPF p56.

3.8 What the ES sets out is simply a concordance with designatable quality and significance but it does not look at the special interest which makes it important. If it did, we would expect an assessment of the special interest (architectural, historic, artistic and archaeological interests) of a heritage asset beyond its listed status and a consideration as to whether its relationship to the surroundings is part of its significance. This is pertinent here because the positioning of a boundary wall, for example, might be more than the property having a clearly defined boundary which has a strong street presence. It might be there for a particular historic or architectural reason such as reflecting earlier land use or to frame or obstruct a view to or from the house. Therefore the divorcing of that relationship has a far higher impact than if the geographical relationship was simply fortuitous. The significance of the boundary wall may also be in the contribution it makes towards channelling views down a street in a conservation area and this should be set out clearly so that impact can be assessed on the conservation area too and the wider setting. The listed building consent applications fail to tackle this and the townscape appendices assess impact in terms of landscape architecture, but not in terms of heritage significance. As a consequence of this, the impact on the conservation areas is neatly side stepped and underplayed. This is especially true of the cumulative impact on the conservation areas of a number of alterations to boundary walls, tree cover and street fronted buildings which will result in an overall change in character and substantial harm to some of the conservation areas. Without a proper statement of significance for each conservation area, we cannot begin to understand what the impact will be on that significance.

3.9 Admittedly providing a statement of significance is a more complex job than the tick box reassurances that the ES provides us with, whereby so little information is provided on the significance of heritage assets that we are left with empty reassurances that impact is low or moderate adverse. But without understanding significance we cannot know that. In order to obtain this level of understanding it is usually only necessary to use a combination of historic mapping, secondary sources, many of which are available online and a site visit to the exteriors; this can be fairly rapid and so proportionate to the asset's significance and has been partially carried out for some listed buildings (in order to obtain listed building consent). If demolition is proposed one would expect the site visit to be more in depth and include a visit to the interiors.

3.10 For example, the route involves the partial demolition of the former Leeds Girls High School gymnasium which was built c.1840 as a coach house and stables for Morley House and was incorporated into Leeds Girls High School in 1906. By 1934 it was shown on the OS maps as a gym. According to the ES (HER 1934, see p 116-7 of appendix), the gym is unlisted but it does make a positive contribution to the street scene. It is part of the Conservation Area which is a designated heritage asset according to the NPPF 2012 p51. The mitigation proposed is 'Building recording survey to identify if significant architectural remains' [sic]. This is an inadequate mitigation response as it is the job of the ES to establish what the significance of the gym is first (including in this case its interiors as they will be partially demolished too) and then to establish whether recording is a proportionate response to its proposed partial demolition. If post determination building recording takes place with no prior understanding of its significance and relationship to the parent house, then it is possible that the building recording will show that its partial demolition was unacceptable and should not have been granted planning permission. In any case, the authors of the ES simply cannot know that the mitigation is reasonable and proportionate to significance. The ES does not therefore comply with the NPPF's need to understand significance.

3.11 This is compounded by another school building. The Lodge at 31 Headingley Lane is not listed according to the ES but was 'presumably' the lodge to the former Leeds Girls High School and dates to 1906. It makes a positive contribution to the Conservation Area. According to the ES (see p 116-7 of appendix H) it will 'possibly' be affected by road widening on the south side of Headingley Lane. It is not unreasonable to expect an ES to be clear as to whether buildings which make a positive contribution to a conservation area are going to be affected (demolished perhaps?) by road widening or not. Not to have that level of detail by the time of submission is unacceptable. The mitigation proposed for this impact which may or may not happen, fails to meet any of the requirements of planning conditions where it states 'Avoid impact - discuss with LCC Conservation Officer'. It is not clear how such a planning condition should be worded, nor how it would be enforced, and what exactly it could possibly achieve. We are left not knowing whether the lodge will be affected (demolished?) or not and the reassurance that someone will try to avoid impact and will have a discussion with the conservation officer. This is not a scenario that the National Planning Policy Framework caters for and so the ES fails again to meet the requirements of the national planning policy.

3.12 There is also a lack of information on the nature of fixings required to the listed buildings, nor which buildings will be used to fix the wires (ES appendix G 4.23-4). While this

may seem like a minor matter, it is surely important when so many fixings are being applied to so many listed buildings? The ES suggests that there are 46 listed street frontage buildings on the North Line (one of which is listed Grade I - Grade I buildings are of exceptional interest, sometimes considered to be internationally important; only 2.5% of listed buildings are Grade I (EH web site⁴) and 5 listed street frontage buildings on the south line. There are other discrepancies between the technical appendices such as the repositioning of the wall on Headingley Lane. Technical appendix G on the Historic Environment states that up to 410m (para 4.10) of wall will be set back, but Appendix H states that 365m will be set back – a difference of 45m between two reports dealing with a designated heritage asset. The wall on the west side of the road (near the listed Ford House) will be set back between 5-10m according to technical appendix H but appendix G states that the set back will be up to 5m (para 4.10).

3.13 The wider impact on the *heritage significance* of the conservation areas, as designated heritage assets, is not considered in the ES. This is perhaps one of the most worrying absences in the ES because the cumulative impact of road widening, boundary wall moving and tree felling on the special interest of the conservation areas is significant. The NPPF 2012 requires local authorities to treat the loss of an element which makes a positive contribution to the significance of a conservation area as substantial harm under para 133 or less than substantial harm under 134 and in doing so should take into account its contribution to the *conservation area as a whole* (para 138). It is therefore vital that the significance in heritage terms (not the landscape studies in the ES) should be assessed for each conservation area and the impact of the scheme identified on the conservation area as a whole. The ES fails to do this.

3.14 The following case studies are designed to highlight just two cases where the approach in the ES and associated listed building consent applications is inadequate and creates the impression in some instances that impact will be acceptable, when in fact the impact will be adverse, long term and irreversible and certainly does not 'conserve and enhance' as outlined in the NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990 s69.

4.0 Case Study: Headingley Hill & Hyde Park & Woodhouse Moor Conservation Area.

4.1 This conservation area is significant for its large stone villas set within generous plots, strong stone boundary walls, mature treescapes and open green spaces. Using the conservation area appraisal (Leeds City Council 2012), the significance of the conservation area is outlined below. The tables below outline features that are highlighted within the conservation area character appraisal and can therefore be regarded as significant and then the impact on that significance is discussed. Where impact is likely to result in a change of character in the conservation area, then it is shaded in dark grey and such impacts merit closer scrutiny because these impacts are likely to be adverse and will result in a change of character to the conservation area. Where a lighter shade of grey is used, there will be an impact, but the level of harm may be less than substantial and it is possible that mitigation can help to reduce the impact. Cumulatively, these impacts on the conservation area as a

⁴ <http://www.english-heritage.org.uk/caring/listing/listed-buildings/> [accessed 020114]

whole are significant and will result in a very different character to three out of the four character areas. The majority of these impacts cannot be adequately mitigated against and the public benefits in this mature leafy suburb are widely disputed by residents. In terms of the NPPF, the proposal is not sustainable in this conservation area and the proposal does not conserve and enhance the conservation area's special character.

Table 1: Statement of significance as derived from the Headingley Hill & Hyde Park & Woodhouse Moor Conservation Area Appraisal (Leeds City Council 2012). Dark shading indicates substantial harm while the lighter shading suggests less than substantial harm where mitigation could help reduce the impact levels.

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
Large stone villas in relatively large plots set well back from the service roads (Headingley Hill character area) (LCC 2012, 2)	Architectural interest	Considerable		The villas affected by the road widening will be much closer to the new widened road and no longer set back. This will reduce the sense of a grand entrance into the properties e.g. Buckingham House
Strong stone boundary walls and outbuildings to streetscape (LCC 2012, 2, 11)	Architectural interest	Considerable	<p>'Boundary treatments and outbuildings also contribute to the character and should be retained and enhanced.'</p> <p>'Consideration should be given to Article 4(2) Direction for targeted elements of the townscape where there are threats to the survival of architectural detailing that is an essential part of the character of the area, including windows, doors,</p>	<p>Boundary walls will be set back in places e.g. Buckingham House, but the technical appendix G on the Historic Environment states that up to 410m (para 4.10) of wall will be set back, but Appendix H states that 365m will be set back – the EA therefore provides conflicting information on impact. The boundary wall (which forms part of the character of the area according to the ES, para 4.533) on Otley Road will have a substantial section removed in order to accommodate a new bypass across the grounds of Hinsley Hall. This will alter significantly the channelling effect of the walls on both sides of the road which create a sense of enclosure and frame views along Otley Road where the road currently has a gentle sweeping curve. This will also be a pinch point with traffic halting so that trolley buses can cut across the road to join the bypass and will further break up the view along Otley Road. A new NGT stop is also proposed here. 'The construction of the off highway NGT route will have a considerable adverse effect on the surrounding area. This includes the construction of the embankment which is required along the route due to the sloping terrain.' (ES para 4.539)</p> <p>The impact of the 4m drop on the west side of the road (near the listed Ford House) where the walls will be set back between 5-10m is not made clear in the LBC, but the ES states that ground levels will need to be raised on the far wall side with the resulting loss of mature trees (appendix G provides different information on the scale of the set back as up to 5m para 4.10).</p>

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
			<p>bargeboards and boundary walls.</p> <p>Many have attractive stone outbuildings and stone boundary walls with large gate piers, together with other attractive details.</p>	<p>Some outbuildings will be demolished or reduced in size (School Lodge and former school gym).</p> <p>‘Several mature trees will have to be removed both along Headingley Lane and throughout the course of the character area, leaving the area feeling more open and exposed. These works will have a high adverse effect on the townscape character of this area, for the duration of the construction phase (paras 4.540-1).</p>
Earlier field pattern dictates the shape of the villa plots (Headingley Hill) (ibid, 9)	Historic interest	Limited	e.g. Ridgeway	Along Headingley Lane these will be altered with the widening of the road and so the property boundaries will no longer reflect the shape of the earlier field pattern
Orientation of buildings along Headingley Lane and at Woodhouse Cliff (ibid, 9, 15)	Architectural	Some	<p>Set well back from the road with long front gardens, while on the south side they turned their backs to Headingley Lane, to face south to take advantage of the sunny aspect.</p> <p>The Woodhouse Cliff area developed with houses initially facing Woodhouse Moor but with later</p>	Some of these on Headingley Lane will no longer be well set back from the road as the road is widened thus reducing the intervening green space.

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
			developments along the cul-de-sac of Cliff Road leading towards Woodhouse Ridge. 'The streetscape of Headingley Lane is central to the character of the area'	
Trees (ibid, 2)	Architectural	Considerable (see quote)	'Trees are particularly important in the mature landscape of the area and need positive management both in the public and private green spaces.'	Trees are proposed for removal along Woodhouse Lane, Otley Road outside Hinsley Hall, c.28 trees on Headingley Lane, 6 mature trees on Buckingham Road and Hyde Park Corner (the beginning of Headingley Lane), Cliff Road, Woodhouse Cliff. 'The loss of mature trees will have a negative effect on the local townscape, decreasing the sense of enclosure, maturity and heritage of this suburban area. The scheme proposals will also have a significant impact replacing a largely soft, grassed environment with one of a transport corridor which includes/consists of hard materials. The NGT stop at the entrance will also be a readily noticeable new element in the environment, transforming this junction with Otley Road (ES Technical appendix para 4.542). There will be significant levels of ground works required to ensure a route for NGT is possible with reasonable amounts of excavation and depositing of the material, all of which will result in retaining structures where previously there were none.' 'These works will have high adverse effects.' (ES technical appendix para 4.543-5)
Dense street pattern (Hyde Park character area)	Architectural interest	Considerable		The removal of the row of shops on Hyde Park corner will remove the sense of enclosure that they provide and open out the junction with Victoria Road and Headingley Lane. Otherwise the dense street pattern will be unaffected.
Stone flags and kerbs to streets	Architectural interest	Some	'Similarly, the character of the	These will be lifted, but presumably replaced in a new position along the widened road

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
including Woodhouse Lane (ibid 2, 26)			public realm whether within the streetscape or green spaces is important including paving materials, street furniture and, lighting.'	
Long front gardens with mature trees (Headingley Lane and Hyde Park character area) (ibid 2, 9, 17, 20)	Architectural interest	Considerable	Green spaces around Ford House and Rose Court are highlighted in the CACA	The road will be widened here with the loss of some green space
Ginnel between Woodhouse Ridge and Moor	Architectural interest	Some		
Traditional shop fronts on Hyde Park corner (ibid 2, 20)	Architectural interest	Limited		Some confusion regarding the future of these shops but at the time of writing no works are proposed apart from the attaching of overhead wires to the buildings
Seven listed Victorian detached houses on Hyde Park corner (ibid 21-2)	Architectural interest	Considerable		Views towards these will be improved by the removal of the advertisement hoardings and small row of shops, but the demolition of these shops will also open out the views from Headingley Lane towards Hyde Park corner and lose the sense of enclosure and funnelling before the streetscape opens up on Woodhouse Moor. Traditionally terraced houses would have been located here to continue the funnelling effect on the junction. The CACA suggests the restoration of the streetscape here
Key view down Headingley Lane to Hyde Park	Architectural interest	Considerable		See above

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
corner and in reverse (ibid 21)				
Unlisted but positive buildings with good detailing (ibid 2, 11)	Architectural interest	Some	Even the more modest terraces, predominantly built in red brick, have stone lintels and sills and other detailing in bargeboards, dormers, eaves and doorways which contribute to the character of the whole area.	One Victorian building (2 Victoria Road) is to be demolished on Hyde Park Corner. The former school gymnasium and lodge on Headingley Lane are proposed for partial or total demolition. 6 Wood Lane is to be demolished – a fine Edwardian house
Landmark buildings (ibid 2, 9, 20)	Architectural interest	Some	St Augustine's and the Parkinson Building especially attractive when viewed from Woodhouse Moor	Views of the Parkinson building will be cluttered with overhead wires and poles and new NGT stops in an area characteristic for its lack of street clutter
Green space of Woodhouse Moor and Ridge (ibid 2, 4-7)	Historic interest Artistic interest Architectural interest	Considerable	Shown on maps from at least 1781, but reduced in mid 19 th century by development. Ridge associated with Civil War. 'the most healthy open space in the township of Leeds'. Town's	Monument and Cinder Moor significantly reduced by the proposal through the removal of a strip of Moor between Woodhouse Lane and the Henry Rowland Marsden monument and another strip on the opposite side of the road which is currently being 'appropriated' by the council for the scheme. It will also be affected by the introduction of new traffic and new road link to Woodhouse Cliff for school access (because the existing roads will become too busy) along Rampart Road displaced by traffic from Hyde Park Corner which will turn part of the Moor into an arterial route. This part of the conservation area will transform from a park with some minor roads to roads with some green space. Also loss of tree cover (on top of deliberate lack of maintenance) along boulevard on the

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
			first Municipal Park. Landscaped c.1870. Moor site of political meetings – suffragettes etc. Ridge landscaped 1879	Moor. Introduction of street clutter in a wide boulevard characterised by its lack of street clutter. Change of character also brought about by proposed use of Woodhouse Lane for twice daily traffic stacking so that trolley buses are given priority in bottle neck areas and new pedestrian crossings.
Horse grazing field off Headingley Lane (ibid, 17)	Artistic and architectural interest	Considerable	'One other significant area of green space which has remained undeveloped is the field used for horse grazing on Headingley Lane between the entrance to Hinsley Hall and St. Columba's Church. A fine row of trees line the road behind a stone wall which continues the attractive streetscape of Headingley Lane, particularly on the northern side.	This wall and trees will be broken through to create the bypass for the trolley buses resulting in the loss of a strong boundary features and mature treescape on the northern side referred to in the CACA as being especially significant.
Views from Woodhouse Moor (ibid 4, 9, 26)	Artistic interest	Some		Views will now include overhead wires and poles when viewed across Woodhouse Lane. Views of Harrison and Potter Trust Homes on Raglan Road which are identified as being significant will also be affected when viewed from Woodhouse Lane.

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
Views along Woodhouse Lane (ibid 15)	Architectural interest	Considerable	'The streetscape of Headingley Lane is central to the character of the area'	These will be substantially altered with the widening of the road, the setting back of boundary walls, the breaking through of boundary walls, the introduction of overhead wires and poles.
Cul-de-sacs which have retained original character (ibid 4)	Architectural interest			Not affected by proposal
Associations with notable people (ibid 8)	Historic	Some	Alfred Austin, Poet Laureate – Ashwood House, 48 Headingley Lane. John Child, architect – The Priory on Cumberland Road. Atkinson Grimshaw, painter – 56 Cliff Road. Arthur Ransome, author of 'Swallows and Amazons' – 6 Ash Grove. Samual Smiles – author – 'Self Help' – 3 Woodhouse Cliff	Not affected by proposal
Woodhouse Cliff character area				Not affected by the proposal

Item of interest and references in CACA	Nature of interest	Level of interest	Notes from appraisal	Impact
Woodhouse Ridge character area				Not affected by the proposal
Statues on Woodhouse Moor (ibid 26)	Architectural and historic interest	Considerable (listed statue of Queen Victoria) and some (Marsden)		The road will be closer to the Marsden statue which currently sits within a landscaped area consisting of a former circular flower bed and paths centering on the statue. When Marsden's statue was moved to the Moor it was referred to as the Valhalla of Leeds' statues in a local newspaper! A new NGT stop will be located near the Queen Victoria and Marsden statues.
Milestone on Monument Moor (ibid 26)	Historic Architectural	Considerable Some		Milestone will have to be moved to accommodate road widening
Diagonal walkways and dark skies effect on main Moor (ibid 26)	Historic and architectural	Some		
Prehistoric archaeology	Archaeological interest	Unknown	N/A	This route has the potential to disturb or destroy below ground remains dating to the prehistoric period. In the 1800s Bronze Age barrows were recorded on Woodhouse Moor, and while upstanding remains no longer survive, it is possible that below ground remains are still present in the area, according to the WYAAS. The name Rampart Road is thought to derive from nearby earthworks which might be the remains of an Iron Age fortification (Wrathmell 2005, 4).

4.2 Overall, the table above suggests that there will be a **significant adverse impact on the Headingley Hill & Hyde Park & Woodhouse Moor Conservation Area** which is a designated heritage asset. While some trees can be replanted, equally mature trees cannot be replanted and the substantial breaches in the Headingley Lane wall near Hinsley Hall (see plate 1) will be permanent and so the loss of the important leafy character and obstruction of principal views of this conservation area cannot be adequately mitigated against. The ES does recognise the **high adverse impact** of the scheme on Headingley Lane in its operational phase and after fifteen years (ES technical appendix G para 5.541-7). It also recognises that the scheme will result in an irreversible change of character, but because residents will have had time to get use to the new layout, the ES reduces the overall impact to **medium/ low adverse** after fifteen years (para 4.557).

4.3 It could be argued that local residents anywhere will get used to any change, no matter how destructive, after fifteen years, but this does not meet the very clear NPPF guidance to 'conserve and enhance the historic environment' (para 126),⁵ nor does it meet the need for local authorities to take into account the desirability of new development to make a positive contribution to local character and distinctiveness (ibid 131). More particular to the conservation area is the requirement of local authorities to look for opportunities for new development within conservation areas to better reveal their significance and the significance of their settings (ibid para 137).

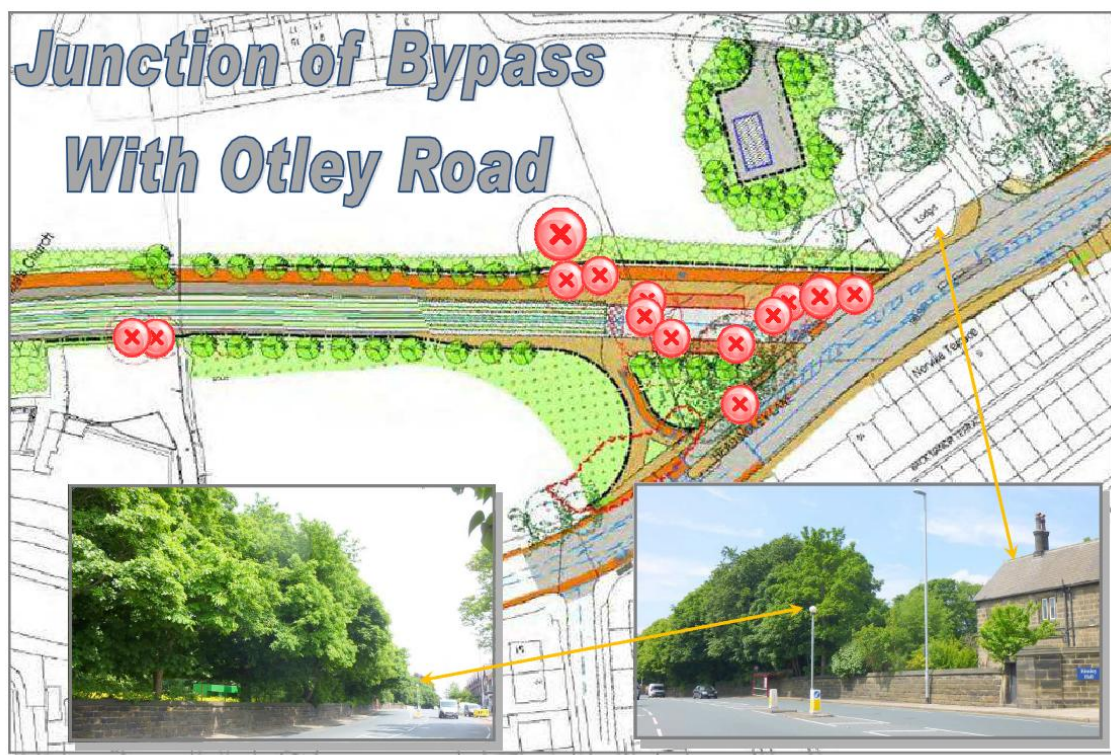


Plate 1. The proposed tree loss where the wall at Hinsley Hall on Otley Road will be breached by the bypass (image by David Tong and courtesy of Bill McKinnon)

⁵ Nor indeed the desirability to conserve and enhance as outlined in Planning (Listed Buildings and Conservation Areas) Act 1990 s69

4.4 This green and leafy approach into and out of Leeds is important and instils a sense of pride amongst local residents and visitors. The recent Council delegated decision (A76/DO/094793) to have a strip of the south side of Woodhouse Moor along Woodhouse Lane declassified as a park in order to appropriate land from the Moor for future works associated with the trolley bus scheme not only pre-empted the result of the public inquiry, but ignores the value that the Moor has to the local community and the contribution it makes towards the significance of the wider conservation area and the approach into/ out of town.⁶ Both Cinder and Monument Moors (part of Woodhouse Moor) have a long and proud civic history as the town's first municipal park and as the location of the Festival of Britain in 1951⁷ (and this is likely to be the origins of the hard standing and cinder surfaces), the salute and service for the Queen's coronation in 1953,⁸ numerous political and trade union rallies including those by suffragettes in 1908 and numerous royal and political visitors. This makes the Moor of considerable historic interest that merits better stewardship.



Plate 2. The grass verge on the right has been the recent subject of a delegated officer's decision to declassify the land as open space so that trolley bus infrastructure can be installed and trees lopped (or removed?) without objections relating to the loss of park.

⁶ The land appropriation was advertised by means of small adverts placed at the back of the Yorkshire Post on Saturdays the 19th and the 26th October. Objections had to be made by the 9th November, by which time the council had received 152 objections.

⁷ <http://leeds.festivalofbritain.woodhousemoor.com/191-2/>

⁸ http://www.yfaonline.com/film/coronation-celebrations-leeds?destination=search%2Fapachesolr_search%2Fwoodhouse+moor%3Fmode%3Dquick%26solrsort%3Dscore%2520desc%252C%2520sis_cck_field_film_id%2520asc%26filters%3Dtype%253Ayfa_film%26highlight%3Dwoodhouse-moor&highlight=woodhouse-moor

4.5 The Moor also has archaeological potential; this has been flagged up by the WYAAS, but has not been explored through the usual channels of a detailed desk based assessment followed by investigative techniques as part of an archaeological evaluation (as suggested in NPPF para 128). As the possible remains of an Iron Age fort may well be the origins of the name Rampart Road and that earthworks allegedly still exist – this should be explored further through an evaluation to quantify the risk of uncovering potentially nationally important and locally much valued archaeological remains being destroyed by the roadworks at this end of the Moor. The significance of such remains is therefore not understood and no mitigation can be accurately proposed.

4.6 A site visit to Woodhouse Moor also makes it clear that Woodhouse Lane is particularly characteristic for its lack of street clutter which will be lost by the introduction of overhead wires, poles, NGT bus stops and traffic stacking.

4.7 The ES suggests that the Monument and Cinder Moors are of ‘low quality’ with a consequent ‘medium sensitivity’ to change and a ‘medium adverse’ impact on the character area in the construction and operational phases (Landscape/Townscape Character and Visual Impact Assessment Technical Appendix G para 4.650 and 4.664). However, this is not to recognise that this part of the Moor has been blighted by a number of transport infrastructure proposals resulting in a deliberate policy of not managing this section of the Moor. It has been deliberately neglected by the council who initially refused to allocate S106 funds of £147,514.63 from the university student accommodation development off Raglan Road (10/00407/FU) towards landscaping on Monument and Cinder Moors despite the university expressing a preference for Monument and Cinder Moors as the beneficiaries of the funding. A subsequent alteration to the agreement⁹ made an allowance for 50% of the funding to go towards Woodhouse Moor, but to date no consultation with local residents has taken place on any landscaping on the Moor and there is no evidence that the money will be spent on the Moor until after the trolley bus scheme has reduced it in scale and significance. A good start to spending this money wisely would have been the commissioning of a conservation management plan which has been made possible by the funding provided by the University, and this would guide a landscaping scheme and include the consultation with local communities, required by the S106 agreement and never carried out. It would also make any subsequent restoration schemes eligible for additional HLF grant aid.

4.8 This deliberate neglect of heritage assets can also be seen at 2 Victoria Road, 6 Wood Lane and the stone terrace on the Headingley Office Park site, which borders Headingley Lane which have all been blighted in the same way for many years and are attractive historic properties which make a positive contribution to the streetscape, but which are now in poorer condition because they have been neglected due to planning blight.

4.9 The NPPF makes it clear that the deteriorated state of heritage assets which have been deliberately neglected should not be taken into account in any decision (NPPF 2012, para 130). The demotion of Cinder and Monument Moors to park of ‘low quality’ therefore should be adjusted upwards to reflect their deliberate neglect and the positive contribution they make towards the wider conservation area and the approach into the city centre.

⁹ <http://hydeparkandwoodhouseonline.com/wp-content/uploads/2014/01/Greenspace-9.pdf>
(11/04449/FU)

Similarly, the now poor condition of the unlisted historic properties should not be taken into consideration when considering them for demolition.

4.10 Taking an historic environment approach rather than that of a landscape study as provided in the ES, this would suggest that Woodhouse Moor for example is of **considerable architectural and historic significance** to the Conservation Area, that it is a **designated heritage asset (as part of a conservation area) and so is of high sensitivity**. The loss of the significant elements of the park's character would be of **substantial harm** which when combined with a high level of sensitivity would be a **major adverse impact**.

5.0 Case Study: Far Headingley Conservation Area

5.1 Far Headingley has a number of features in common with Headingley Hill & Hyde Park & Woodhouse Moor Conservation Area in that it is significant for its large villas within landscaped grounds (describe as 'important greenspace' in the character appraisal (Leeds 2008, 10), landmark buildings, boundary walls, gateposts and gates and tree lined roads and gardens. Indeed the conservation area character appraisal describes the boundary walls as a 'defining feature' and the soft landscaping as a 'crucial feature' (ibid, 2 and 10). It also emphasises that 'tree lined roads and boundary walls are an important part of the area's character (ibid).

5.2 The ES Historic Environment Technical Appendix H refers to the following features as being important in the Conservation Area, namely, the spire of St. Chad's Church as the principal landmark feature, the green open spaces around the church and the cricket pitch, the contrast between the two distinctive settlement patterns, the mature trees and the war memorial with its yew hedging and twin silver birches.

5.3 Technical Appendix G dealing with townscape/ landscape states that there are no key views in this conservation area (4.436). While no key views are shown on the significance map, the text of the conservation area appraisal notes the uninterrupted vistas along the Otley Road where stone boundary walls and mature trees are key features of the area and semi detached houses set back from the road and the fact that the spire of St Chad's can be seen from some distance away (Leeds City Council para 3.48). This suggests that the views along Otley Road are being under valued in the ES.

5.4 There is another aspect of the ES which clearly downplays significance so that impact can also be downplayed. The ES suggests that the trees are a moderately valuable characteristic with only a medium sensitivity to change (Technical Appendix G para 4.414-5) despite the clear steer from the conservation area appraisal that they are important and essential to the character of the area (Leeds City Council 2008, 8 and 10). Furthermore, thirteen of the trees to be felled near St. Chad's Church (listed grade II*) are individually mapped in the conservation area appraisal (ibid, 8) as 'significant trees'. Technical appendix H does however acknowledge that the trees are significant and it states that the trees combined with those on the east side create the character of a tree lined avenue and form a distinct feature in long distance views and that the Conservation Area boundary has been deliberately defined in order to include them (para 4.31). However technical appendix H then

does cartwheels in order to come to the conclusion that the trees are only medium value assets with a moderate change to the baseline.

5.5 When the conservation area appraisal uses such strong terminology to make it clear that the trees are significant and that the boundary of the conservation area is deliberately shaped to include them, it is difficult to understand how the ES can conclude that they are moderately valuable or of medium value (see plate 2) and that the impact will be a moderate change. Nor has there been any consideration in their role as making a positive contribution to the setting of a listed grade II* building in either appendix. As the conservation area appraisals and management plans have been adopted by the Council they are a material consideration in the determining of planning decisions, but scant regard has been given to their views on the positive contributors to the conservation areas.

5.6 This brings us back to the lack of a proper heritage based statement of significance for the conservation areas and the consistent underplaying of the value of the elements which make a positive contribution to their significance. It is especially alarming that no impact assessment has been carried out of the conservation areas as designated heritage assets. The ES is simply not NPPF compliant.

5.7 The conservation area appraisal (ibid 2 and 12) raises the following management issues and action points which should be taken into consideration in any planning decision including:

- Promote public realm enhancements within the conservation area as opportunities arise.
- Ensure that future public realm works respect and enhance the special character of the conservation area. (p2)
- Ensure that traffic management measures impact as little as possible on the special character of the area. (ibid)
- Develop a tree strategy to guide future positive management. (Trees provide an important source of urban cooling and their protection and planting is going to be an increasingly important element of the council's approach to climate change adaptation.)

Action: Promote public realm enhancements within the conservation area as opportunities arise. Ensure that future public realm works respect and enhance the special character of the conservation area.

5.8 Again the use of the term 'respect and enhance', mirrors that of the NPPF 2012 and the Planning (Listed Buildings and Conservation Areas) Act 1990 s69 which both see 'conserve and enhance' as the desirable outcome of any changes. The creation of a 6 lane road (including a central reservation) within a leafy suburb, the loss of significant trees, an increase in street clutter and the alteration to the setting of a listed grade II* building cannot in any way be seen to conserve and enhance the special interest of the Far Headingley Conservation Area. The proposed scheme fails to impact 'as little as possible on the special character of the area' and an approach to creating a tree strategy that involves the felling of most of the significant trees is no strategy that can be supported without loss of significance. One of the public benefits of the trolley bus scheme as promoted by the Council is the low

environmental impact of the buses, yet the loss of so many mature trees in suburbs characterised by their mature tree cover flies in the face of the Council's policy as outlined in the Conservation Area Appraisals as seeing trees as an 'increasingly important element of the council's approach to climate change adaptation' (Leeds City Council 2008, 12).



Plate 3: Aerial photograph showing which trees to the east of St. Chad's will be felled by the road widening. Thirteen of these trees are identified as being 'significant trees' in the Conservation Area Appraisal (Leeds City Council 2008, 8), yet the ES technical appendix only refers to them as being a moderately valuable characteristic with only a medium sensitivity to change (para 4.414-5) – a clear example of an element within a designated heritage asset being undervalued by the ES. The loss as shown above is described in the ES as moderate/slight adverse effect which is not significant. (photo by David Tong and courtesy of Bill McKinnon)

Table 2: The significance of Far Headingley Conservation Area as defined in the conservation area character appraisal (Leeds 2008). Dark shading suggests substantial harm while the lighter shading suggests less than substantial harm where mitigation could help reduce the impact levels.

Item of interest and references in CACA	Nature of significance	Level of significance	Notes from appraisal	Impact
Large villas in landscaped grounds (Leeds 2008, 2)	Architectural	Considerable		Not affected
Rural cottage/ village character (ibid, 2, 7)	Architectural	Some		Not affected
Settlement pattern and density of development contrast between above early rural settlement and later planned (ibid 2, 7, 9)	Architectural	Considerable		Not affected
Distinction between front and back streets (ibid, 7)	Architectural	Some		Not affected
Sense of square at Three Horseshoes (ibid, 2, 7)	Architectural	Some		Not affected
Surviving historic shop fronts and industrial buildings (ibid, 2, 10)	Architectural	Some		Not affected
Landmark building - St Chad's spire (ibid, 2, 7)	Architectural	Considerable (and listed grade II*)	'The set-back location of St Chad's Church is notable, forming another important focus of the village. It is an integral part of the village and contributes significantly to its character and identity. The green spaces of the surrounding churchyard and cricket field form important open spaces. Elsewhere open spaces are defined by established garden sites /grounds with public open spaces limited to	

Item of interest and references in CACA	Nature of significance	Level of significance	Notes from appraisal	Impact
			informal areas occurring around road junctions.' 'St Chad's spire forms the principal landmark feature of the conservation area and can be seen from some distance away.'	
Boundary walls, gateposts and gates (ibid 2, 10)	Architectural	Considerable	'Boundary walls, York stone pavements, kerbs and stone sett street surfaces are all important streetscape features. As is the good survival of traditional street signs. Boundary walls are a defining feature. Stone walls of squared blocks, sometimes with triangular profile copings, edge streets and ginnels. Gate posts are sometimes relatively ornate with decorative capstones. Gates are often of wrought iron or more simple painted timber fittings.'	
Historic street signs (ibid, 2)	Architectural	Some	See above 'The area has a good collection of traditional street signs which add interest and authenticity to the area.'	Not affected
Tree lined roads and large garden plots (ibid, 2, 8, 10)	Architectural	Considerable	' Soft landscaping is a crucial feature of the area. Tree-lined roads are typical with large garden plots to front and back of the 19 th century properties.' Tree-lined roads and boundary walls are an important part of the area's character. 'Trees, gardens and soft landscaping form an essential	Five trees to be removed and verge to be narrowed near St Chad's resulting in substantial change in character. The ES suggests that the trees are a moderately valuable characteristic with only a medium sensitivity to change (para 4.414-5) despite the clear steer from the conservation area appraisal (see column opposite) that they are

Item of interest and references in CACA	Nature of significance	Level of significance	Notes from appraisal	Impact
			<p>element of the area.'</p> <p>'Trees are an important part of the distinctive character of the area. Tree-lined roads are a defining feature. Most of the specimens are planted within front garden plots providing privacy from the road. The combined group value of these trees has great amenity value for the area. Species vary but are typically deciduous and include horse chestnut, sycamore, beech and copper beech.'</p>	important and essential to the character of the area. This is a clear example of the significance of the conservation elements being underplayed.
Large garden surrounds (ibid, 10)		Considerable	'The established garden grounds of the villas and villa-terraces form important greenspace. '	Not affected
Green verge - West side of Otley Road south of the church (ibid, 10)	Historic and Architectural	Considerable	Wide grass verge and the low stone boundary walls of the houses beyond originally marked the boundary of Kirkstall Grange.	This verge will be reduced in order to turn Otley Road into a 5 lane road with additional central reservation (6 lanes in effect). The reduction will be greatest near St. Chad's where the verge is already at its narrowest.
Green spaces and cricket field around St Chad's (ibid 7, 10)	Architectural Artistic	Considerable	'The green open spaces of the churchyard and cricket pitch around St Chad's are an important feature. The mature trees of this area are an important group.'	The widening of the road will reduce the green verge and require the felling of trees east of St. Chad's. These are identified as 'significant trees' in the conservation area appraisal and are individually depicted on the significance map (Leeds 2008, 8).
War memorial and assoc trees (ibid 8, 10)	Architectural Artistic Historic	Some	'The war memorial has a strong impact, with its dramatic yew hedge and twin silver birches.'	Road to be widened here and NHT stop placed in front. 'Significant trees' as defined in the conservation area appraisal to be

Item of interest and references in CACA	Nature of significance	Level of significance	Notes from appraisal	Impact
				felled.
Greenwood beck undeveloped area with natural characteristics (ibid 10)	Artistic	Some		Not affected
Uninterrupted vistas along principal roads that feature boundary walls, treelined roads and set-back large properties. (ibid 7)	Architectural	Considerable	'The straight line of the principal roads and the generally flat topography of the area allow uninterrupted vistas that feature boundary walls, treelined roads and set-back large properties.'	Increase in traffic so that the 6 lane wide highway dominates and introduction of additional street clutter and loss of tree cover will diminish the uninterrupted views.
Short range views in village core (ibid 7)	Architectural	Considerable		Not affected
Many unlisted properties that make a positive contribution to the character of the conservation area (ibid 10)	Architectural	Some	Other notable buildings include the surviving and listed c1770 parsonage, the listed gate lodge to Beckett Park with its distinctive ornate barge board details. The gothic-revival details of the former chapel on Moor Road with its pointed arch door and lancet windows and the flat-arched windows under drip mould details of the original school at Hollin Lane add variety. Equally of interest is the listed Masonic Hall, Castle Grove Drive. Originally one of the larger villas of the area its roof features a lead covered dome and balustrade. The unlisted Cottage Road Cinema is another local landmark structure	Not affected
Common materials which unify (rock cut	Architectural	Considerable		Not affected

Item of interest and references in CACA	Nature of significance	Level of significance	Notes from appraisal	Impact
stone, brick) (ibid 9)				
Houses two to 2 ½ storeys (ibid 9)	Architectural	Considerable		Not affected
Pitched roofs, chimneys, dormers, sash windows, panelled doors, half timbering, fan lights, porch hoods (ibid 9)	Architectural	Some		Not affected
York stone pavements (ibid 10)	Architectural	Some	Surviving historic surfaces are important. High quality York stone pavements edged with stone kerbs add a sense of quality. Thresholds of squared York stone setts are a feature of some road junctions in the area.	Pavements will be reinstated but narrower
Cobbled street surfaces (ibid 10)	Architectural	Some	A number of cobbled street surfaces also survive, giving high textural qualities and completeness to village streetscapes, for example the stone sett paved streets of the Heddons to the east of the conservation area.	Not affected

5.9 Taking an historic environment approach rather than that of a landscape study as provided in the ES, this would suggest that the mature trees and grass verge on Otley Road for example are of **considerable significance** to the Conservation Area, that they are elements of a **designated heritage asset (as part of a conservation area) and form the setting of a listed grade II* building and so are of high sensitivity**. The loss of these significant elements of the conservation area's character would be of **substantial harm** which when combined with a high level of sensitivity would be a **major adverse impact**.

6.0 Conclusion

6.1 The ES and supporting appendices which support the NGT Leeds proposal are flawed in their methodology and as a result they under play the impact of the proposal on heritage assets and conservation areas in particular. There is no understanding of heritage significance, with the significance and impacts on the conservation area being dealt with in landscape chapters which do not adopt heritage approaches to understanding significance. The heritage appendices fail to adequately assess significance of the conservation areas or their impacts and the methodology used confuses significance with designation or non designation, condition and impact.

6.2 It is fundamental to NPPF 2012 that significance must be understood before informed decisions can be made on development proposals and it is clear that the ES falls far short of this. By looking at two sample conservation areas, it is clear that:

1. The value of elements which make a positive contribution towards the character of the conservation areas (mostly mature trees, boundary walls and streetscape) have been downplayed despite clear steers from the conservation area appraisals (which are a material consideration in the determination of planning applications) that they are of significance and essential to the character of the area. This has allowed the ES to suggest that impact is less than it would be if the significance of those elements was recognised.
2. That the cumulative impact on each conservation areas as a designated heritage asset has not been considered at all contrary to NPPF guidance para 138
3. That the proposal does not 'conserve and enhance' the conservation areas as sought in NPPF 2012, Planning (Listed Buildings and Conservation Areas) Act 1990 s69 and Policy P11 of the Leeds Local Development Framework (which only seeks to conserve the historic environment and its setting)
4. That there is an over reliance on receptors (residents) getting used to their transformed environments so that it can be referred to as a reduced impact after fifteen years
5. That the transforming effect of the landscape east of St. Chad's has not been considered as the impact on the setting of a grade II* listed building
6. That the deliberate neglect of parts of Woodhouse Moor and some historic building stock blighted by a series of infrastructure proposals has been allowed to play down their significance contrary to NPPF para 130 and thus reducing perceived impact.

6.3 The NPPF also requires that where a development includes a heritage asset with archaeological interest, that the developers should submit an appropriate desk based assessment and, where necessary, a field evaluation'. The ES acknowledges that no fieldwork has taken place. Indeed the authors of the ES appear to acknowledge the limitations of the ES in paragraph 2.29 of the HE appendix (H):

'The current understanding of the extent and survival of archaeological remains within the study area is limited due to lack of data and fieldwork. The exact nature, extent and significance of potential archaeological remains is difficult to accurately predict from desk-based studies alone and this generates a degree of uncertainty in predicting impacts and effects upon such resources.'

6.4 This makes it clear that the ES cannot meet the needs of the NPPF in its current form and that if this proposal is to progress, a better understanding of the significance of the heritage assets is required first, so that a better understanding of the impact can also be obtained. This will ensure that a balanced judgement can be made which has regard to the significance of the heritage asset and the scale of harm or loss (NPPF para 135).

6.5 It is not clear why the WYAAS archaeologists should accept the lack of a pre-determination evaluation and statement of significance and why they should recommend a course of mitigation which so clearly conflicts with national planning policy. In their own response, they very selectively quote the NPPF para 141 to suggest that preservation by record is acceptable whilst ignoring the rest of that paragraph (which is in fact about the curation of the HER and not about making planning decisions in any case) which requires developers to record and advance our understanding of significance and the underpinning of the NPPF. Nor do they refer to all the paragraphs from 126 – 140 that require significance to be understood before making planning decisions. The statement in the appendix on the historic environment that 'In all cases, Metro and LCC have committed to the implementation of all mitigation outlined within this technical appendix' is not an adequate planning response and is not enforceable.

6.6 The application should be refused because there is no understanding of significance and therefore impact, relating to buried archaeology and the impact on the conservation areas in the north west suburbs consists of substantial harm to significant elements of the conservation areas.

CHH 28.01.14

7.0 Bibliography

DCLG	2012	<i>National Planning Policy Framework</i>
Leeds City Council	2008	<i>Headingley Hill, Hyde Park and Woodhouse Moor Conservation Area Appraisal and Management Plan</i>
Leeds City Council	2012	<i>Far Headingley Conservation Area Appraisal and Management Plan</i>
Leeds City Council	2013	<i>Local Development Framework Core Strategy</i>
Wrathmell, S	2005	<i>Leeds. Pevsner Architectural Guides.</i>

ES documents:

A-08b Environmental Statement - Volume I - Main Statement

A-08c-7 Technical Appendix G - Historic Environment

A-08e-1 Technical Appendix H - Landscape, Townscape and Visual Amenity

A-09a-06 LBC006: Buckingham House, Headingley Lane (Headingley Hill, Hyde Park and Woodhouse Moor CA)

A-09a-07 LBC007: Ford House, Headingley Lane (Headingley Hill, Hyde Park and Woodhouse Moor CA)