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21 October 2015

Dear Sirs,

**re: Leeds Local Plan – Site Allocations Plan: Publication Draft**

Thank you for consulting Historic England about the latest iteration of the Site Allocations Plan. We have the following comments to make regarding its contents:-

**General comments**

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This means that the plan, as a whole (including the sites it is putting forward as allocations), has to set out a framework which is likely to conserve the historic environment of the Plan area.

The Sites Allocations Local Plan proposes a large number of sites for development which could harm elements which contribute to the significance of the City's heritage assets. There are, for example:-

- 11 sites which involve the loss of open spaces adjacent to Conservation Areas,
- 6 which involve the loss of open spaces within Conservation Area,
- 8 sites which involve the development of open spaces in the vicinity of Listed Buildings,
- 6 more where the development of an open space could impact upon both a Conservation Areas and Listed Building,
- One which seems likely to directly impact upon a Scheduled Monument, and
- A large Urban Extension in the vicinity of a Grade I Historic Park and Garden

The Allocation of a site for development in the Local Plan is, as Paragraph 2.52 of Section 2 of the Plan makes clear, “establishing that the site is suitable for that use” and, therefore, that the principle of development in those particular locations is acceptable. However, in the case

of this Local Plan, there has been absolutely no evaluation of what impact the loss of these currently-open areas and their subsequent development might have upon those heritage assets.

In the absence of any assessment of the degree of harm which the proposed Allocations might cause to the historic environment or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, the plan cannot demonstrate that the development of the sites it is putting forward for development is compliant with the Plan's policies for the protection of the historic environment as set out in Core Strategy Policy P11. Moreover, the Plan also fails to demonstrate that:-

- (a) The sites it is putting forward for development will deliver a “positive strategy for the historic environment” as is required by NPPF Paragraph 126.
- (b) The sites that are allocated will be likely to “contribute to protecting or enhancing the historic environment”. Therefore, it has not shown that it is likely to deliver sustainable development in terms of the historic environment [NPPF Paragraph 7].
- (c) The sites which it has allocated are likely to “conserve heritage assets in a manner appropriate to their significance”. Therefore it has not shown that it will be likely to deliver the Government’s objectives for the historic environment [NPPF Paragraph 17].
- (d) It has complied with the statutory duty under S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.

Moreover, there is no evidence that, in preparing the plan, the local planning authority has had “*special regard to the desirability of preserving*” any of its Listed Buildings. Whilst it is accepted that S66 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 does not apply specifically to Plan making, the absence of any evaluation must bring into question the deliverability of a number of those particular sites. When the requirements to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses may mean that the quantum of development on that particular site is, either, unachievable or, at worst, that the need to safeguard the setting of the building actually renders the site undevelopable.

For the above reasons, therefore, Historic England considers that this plan is unsound.

## Detailed comments on the proposed Allocations

### Area proposals 1 - Aireborough

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
42	HG2-1 New Birks Farm, Guisley	Unsound	<p>This area adjoins the boundary of the Guiseley Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “<i>special attention</i>” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).
44	HG2-2 Wills Gill, Guiseley	Unsound	<p>This area adjoins the boundary of the Guiseley Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements</p>

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			<p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “<i>special attention</i>” to “<i>the desirability of preserving or enhancing the character or appearance</i>” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its</p>	<p>which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			significance.	
51	HG2-5 Coach Road/Park Road, Guiseley	Unsound	<p>The northern half of this site lies within the Guiseley Conservation Area and the remainder adjoins its boundary.</p> <p>When the Conservation Area was originally designated, there must have been an acceptance that the open area at the northern end of this Allocation contributed towards the character or appearance of the area. Therefore, one might conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

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			<p>character or appearance” of its Conservation Areas.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance</p>	
55	HG2-7, Swaine Hill Terrace, former Brrokhuill Nursing Home	Sound	<p>This building has been identified in the Yeadon Conservation Area Appraisal as making a positive contribution to the character of Yeadon Conservation Area.</p> <p>Therefore we welcome the requirement that the building should be retained and converted and that its character and setting should be preserved.</p>	-
59	HG2-9 Land at Victoria Avenue,	Unsound	<p>This area adjoins the boundary of the Yeadon Conservation Area.</p> <p>By allocating this site for</p>	(1) An assessment needs to be undertaken of the contribution which this site makes to the

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	Yeadon		<p>development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the</p>	<p>elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>



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			<p>provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
61	HG2-10 Gill, Yeadon	Unsound	<p>This area adjoins the boundary of the Nether Yeadon Conservation Area. The Conservation Area Appraisal identifies a number of key views from the Conservation Area across this site. In addition, there are a number of Listed Buildings to the south of this site.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or to the setting of the Listed Buildings or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and Listed Buildings and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area or Listed Buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded</p>

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			<p>Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area or the Listed Buildings or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area and to the setting of the nearby Listed Buildings, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	that the development would still be likely to harm elements which contribute either to the significance of the Conservation Area or the Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).

Page	Site	Sound/ Unsound	Comments	Suggested change
65	HG2-12 Wood- lands Drive, Rawdon	Unsound	<p>This area adjoins the boundary of the Rawdon Cragg Wood Conservation Area..</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

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			<p>that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	

### Area Proposals 2 - City Centre

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
85	HG2-187 Brandon Road, LS3	Sound	<p>This site lies within the Hanover Square and Woodhouse Square Conservation Area. Waverley House at the south-east corner of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			Act and the requirements of the NPPF.	
87	HG2-188 Great George Street	Sound	<p>This site lies within the Leeds City Centre Conservation Area. The Leeds General Infirmary opposite this site is a Grade I Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
89	HG2-189 North Street (59) - Caspar building and Centenary House LS2	Sound	<p>Centenary House at the southern end of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this heritage asset in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	
93	HG2-191 Aire Street (49) LS1	Sound	<p>This site lies within the Leeds City Centre Conservation Area. Churchill House adjacent to this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF	
95	HG2-193 Water Lane Car Park	Sound	<p>This site lies within the Holbeck Conservation Area. Tower Work Entrance Range, to the north, and 103 and 105 Water Lane, to the south, are Grade II Listed Buildings..</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
99	HG2-195 Silver Street/ Midland Mills South	Sound	<p>This site lies within the Holbeck Conservation Area. The Midlands Junction Foundry, to the north, is a Grade II Listed Building..</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
101	HG2-196 Bath Road West	Sound	<p>Part of this his site lies within the Holbeck Conservation Area. The former Marshall Mills Schoolroom, to the east, is a Grade II Listed Building..</p> <p>Therefore, we welcome the Site</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF	
103	HG2-197 Bath Road East	Sound	<p>This site lies adjacent to the boundary of the Holbeck Conservation Area. The former Marshall Mills Schoolroom, to the east, is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
105	HG2-198 Manor Road - Manor Court, Holbeck LS11	Sound	<p>This site lies adjacent to the boundary of the Holbeck Conservation Area. Temple Mill, to the west, is a Grade I Listed Building..</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
109	MX2-15 Great George Street - LGI	Unsound	<p>This site occupies a key site within the Leeds City Centre Conservation Area. The majority of the site is occupied by the Grade I Listed Leeds General Infirmary and there are is a group of important Civic Listed Buildings to its east.</p> <p>Given the importance of this building and its sensitive location within the Leeds City Centre Conservation Area, it is not sufficient to simply provide the generic guidance that has been used elsewhere in this DPD. The Site Requirements for this Allocation need to be considerably more detailed regarding which elements of the Listed Buildings are to be retained and adapted and the key considerations for how the redevelopment of any parts of this site can be achieved in a manner which conserves the character of this part of the City Centre.</p>	<p>The Site Requirements for this allocation should be expanded to set out:-</p> <p>(1) Which parts of the building are proposed to be retained and reused</p> <p>(2) The key considerations for how the redevelopment of any parts of this site can be achieved in a manner which conserves the character of this part of the City Centre.</p>
111	MX2-16 Bridge Street, Baker House	Sound	<p>Crispin House, to the west of this site, is a Grade II Listed Building..</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
113	MX2-17 North Street - Leeds College of Building	Sound	92 to 96 North Street, to the west of this site, are Grade II Listed Buildings..	-



Page	Site	Sound/ Unsound	Comments	Suggested change
			Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these buildings in line with the statutory duty under the 1990 Act and the requirements of the NPPF	
119	MX2-20 Westgate - Brotherton House LS1 2RS	Sound	We welcome the Site Requirements relating to the non-designated heritage asset on this site. These will help to ensure that the site is developed in a manner which will safeguard the significance of these buildings in line with requirements of the NPPF	-
123	MX2-23 Quarry Hill/York Street Leeds	Sound	The former Petrol Station on Eastgate, to the west of this site, is a Grade II Listed Buildings..  Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF	-
125	HX2-25 Duncan Street (7)	Sound	This site lies within the boundary of the Leeds City Centre Conservation Area. 7 Duncan Street is Grade II Listed Building.  Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			the statutory duty under the 1990 Act and the requirements of the NPPF	
127	HX2-26 Kirkgate Phase II	Sound	<p>This site lies within the boundary of the Leeds City Centre Conservation Area. Waterloo House, to the south of this site, is Grade II* Listed Building..</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
129	HX2-27 Wharf Street	Sound	<p>This site lies within the boundary of the Leeds City Centre Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the character of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
131	HX2-29 The Calls (38)	Sound	<p>This site lies within the boundary of the Leeds City Centre Conservation Area and contributes to the character of this part of the designated area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			safeguard the character of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF	
133	HX2-30 Water Lane Railway Triangle	Sound	<p>This site lies adjacent to the boundary of the Holbeck Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the character of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
135	HX2-31 Marshall Street - 1953 Building, Holbeck	Sound	<p>This site lies within the Holbeck Conservation Area. Temple Mill, to the north, is a Grade I Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	-
137	HX2-32 Water Lane - Westbank	Sound	<p>This site lies adjacent to the Holbeck Conservation Area. 97 Water Lane, to the west, is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF	

### Area Proposals 3 - East

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
160	HG2-119 Red Hall Offices and playing field	Unsound	<p>There is a group of three Grade II Listed Buildings at Red Hall.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to this Listed Building, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special</p>	that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).

Page	Site	Sound/ Unsound	Comments	Suggested change
			architectural or historic interest or setting of this Listed Building and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.	
163	HG2-120 Manson Lane – former Vickers Tank Factory	Sound	<p>The dovecote attached to the farm buildings at Manston Hall Farm is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF</p>	
166	HG2-122 Cartmell Drive, Halton Moor	Unsound	<p>The edge of this site lies 600 metres from the edge of the Grade II Registered Historic Park and Garden at Temple Newsam.</p> <p>In line with the approach adopted elsewhere, the proximity of this designed landscape and the need to ensure that development proposals safeguard the elements which contribute to its significance should be referred to in the Site Requirements</p>	<p>HG2-122 add the following additional Site Requirements:- “The site lies close to the boundary of the grade II Registered Historic Park and Garden at Temple Newsam. Any development will be required to safeguard the elements which contribute to the significance of this designed landscape”</p>
168	HG2-123 Colton Road East, Colton	Unsound	<p>There are a number of designated heritage assets in close proximity to this site:-</p> <ul style="list-style-type: none"> <li>• Vine Cottage and Yew Tree Cottage on this site's northern edge are Grade II Listed Buildings as is Holly Tree Farmhouse on this area's</li> </ul>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>north-western edge.</p> <ul style="list-style-type: none"> <li>The shrunken medieval village of Colton adjoins this site's western edge and there is a stretch of Grim's Ditch 200 metres from the eastern boundary of this area. These are both Scheduled Monuments.</li> <li>This area adjoins the boundary of the Colton Conservation Area.</li> </ul> <p>We have significant concerns about the impact which this development might have upon these designated heritage assets.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest of the Listed Buildings, to the character or appearance of the Conservation Area, or to the setting of either the Scheduled Monuments or Registered Historic Park and Garden or what harm might result to those elements which contribute to their significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the</p>	<p>assets in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these designated heritage assets, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these designated heritage assets, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>conservation and enjoyment of the historic environment. In addition:-</p> <ul style="list-style-type: none"> <li>• There is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually be developed.</li> <li>• The Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF</li> </ul>	



Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <ul style="list-style-type: none"> <li>National policy guidance makes it clear that Scheduled Monuments are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional.</li> </ul> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to these designated heritage assets, or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to significance of these assets and what effect the loss of this site and its subsequent development might have upon those elements which contribute to their significance.</p>	

Page	Site	Sound/ Unsound	Comments	Suggested change
173	HG7-3 Bullerthorpe Lane, Temple Newsam	Unsound	<p>This proposal includes part of Grim's Ditch which is a Scheduled Monument. We have significant concerns about the impact this might have upon the monument.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the Scheduled Monument or what harm might result to those elements which contribute to its significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Scheduled Monuments are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. The allocation of this site could, potentially, harm elements which contribute towards the significance of this Scheduled Monument.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Scheduled Monument or,</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the setting of the Scheduled Monument and what impact the loss of this open area and its subsequent development might have upon its significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of this Scheduled Monument, then the Plan needs to be set out how that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Scheduled Monument, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to the Scheduled Monument and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p> <p>It should be noted that Scheduled Monument Consent will be also required from the Secretary of State should this proposal go ahead.</p>	

#### Area Proposals 4 - Inner

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
195	HG2-89 Oak Tree Mount	Sound	<p>The Church of the Epiphany, to the east of this site, is a Grade I Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			Listed Building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	
211	HG2-99 Busling- thorpe Tannery/ Hill Top Works Sheepscar	Unsound	<p>This site lies within the Buslingthorpe Conservation Area.</p> <p>The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas and the NPPF makes it clear that the loss of a building which makes a positive contribution to the significance of a Conservation Area should be regarded as resulting in substantial harm to that area.</p> <p>In the absence of an up-to-date Conservation Area Appraisal, the Site Requirements for this Allocation should identify whether or not there are any buildings on this site which contribute to the character of the Conservation Area and which should, as a result, be retained as part of the development of this area.</p>	HG2-99 Conservation Area - This should also identify which buildings contribute to the character of the Conservation Area and should, as a result, be retained as part of the development of this area
211	HG2-99 Busling- thorpe Tannery/ Hill Top Works Sheepscar	Factual correction	There are no Listed Buildings likely to be affected by the development of this site	Delete the Site Requirements relating to Listed Buildings.
215	HG2-101 Hudson Road, Hudson Mill,	Sound	This site lies opposite the Grade II Registered Historic Park and Garden at Beckett Street Cemetery.	-

Page	Site	Sound/ Unsound	Comments	Suggested change
	Burmantofts		Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Historic Park and Garden in line with the requirements of the NPPF.	
226	HG2-109 Burley Street	Sound	<p>67 and 67A Burley Road to the south-west of this site are Grade II Listed Buildings.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Listed Building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
228	HG2-110 Wesley Road, Tong Road Armley	Sound	<p>This site adjoins the boundary of Armley Conservation Area and lies opposite the Grade II* Listed Church of St Bartholomew.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
233	HG2-113 Round House (rear of)	Sound	There are a number of Listed Buildings around this site including the Grade II* Listed Roundhouse.	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	
237	HG2-116 Winrose Drive, Middleton	Sound	<p>This site lies some 320 metres from the buried remains of a former colliery in Middleton park which are Scheduled.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this monument in line with the requirements of the NPPF.</p>	-
239	HG2-117 Belle Isle Road – Merlyn Rees High School	Sound	<p>Ebor House to the east of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
239	HG2-201 York Road, east of Pontefract Lane	Sound	<p>The former York Road Library and Baths to the north of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment, especially</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			that any development should facilitate the repair and reuse of this building. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	
243	MX2-7 Thomas Danby College, Roundhay Road	Sound	<p>The former office of the West Yorkshire Archives to the west of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
248	MX2-9 Kirkstall Road	Sound	<p>Spring Gardens Lock to the south of this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
250	MX2-10 Wellington Road	Sound	<p>Oddys Locks and Castleton Mill, to the south of this site, and Wellington Bridge, to the north-east, are Grade II Listed Buildings.</p> <p>Therefore, we welcome the Site Requirements relating to the</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these buildings in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	
263	EO2-2 Office Scheme, Wellington Road	Unsound	<p>This site lies opposite the Grade II Listed former railway repair shop.</p> <p>In line with the approach adopted elsewhere, the proximity of this Listed Building and the need to ensure that development proposals safeguard the elements which contribute to its significance should be referred to in the Site Requirements</p>	<p>Amend the Site Requirements as follows:-</p> <p><i>“This site is in the setting of a Listed Building. Any development should preserve the special architectural or historic interest of the Listed Building and its setting.”</i></p>

#### Area Proposals 5 - North

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
279	HG2-29 Moseley Wood Gardens (land off)	Sound	<p>There are two cup and ring-marked rocks in the Gab Wood to the north of this site. These are Scheduled Monuments. In addition, there are a number of Grade II Listed Buildings around Moseley Farmhouse 165 metres to the north of this site.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will</p>	-



Page	Site	Sound/ Unsound	Comments	Suggested change
			safeguard the significance of these assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	
287	HG2-33 Land south-east of Holt Park Leisure Centre	Sound	<p>There are a number of Grade II Listed Buildings around High Farm Public House to the north-east of this site.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these buildings in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
289	HG2-34 Farrar Lane	Sound	<p>There are a number of Grade II Listed Buildings around High Farm Public House to the north-east of this site.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these buildings in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
295	HG2-38 Dunstarn Lane (land south)	Unsound	<p>This site lies some 300 metres from the boundary of the Meanwood Conservation Area to the south.</p> <p>In line with the approach adopted elsewhere, the proximity of the Conservation Area and the need</p>	<p>Amend the Site Requirements as follows:-</p> <p><i>“This site lies in the setting of the Meanwood Conservation Area. Any development should preserve or enhance the</i></p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			to ensure that development proposals safeguard the elements which contribute to its significance should be referred to in the Site Requirements	<i>character or appearance of the Conservation Area..”</i>
299	HG2-41 South of A65 from Horsforth and Rawdon RA to crematorium	Unsound	<p>This allocation would involve a very large development alongside the eastern edge of the Rawdon Cragg Wood Conservation Area. It could also affect the setting of the Horsforth Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Areas or what harm might result to those elements which contribute to the significance of these designated areas by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Areas and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Areas, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF,</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Areas, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	Paragraph 133 or 134).
301	HG2-42 Broadway and Calverley Lane, Horsforth	Sound	<p>This site lies some 50 metres from the boundary of the Horsforth Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			and the requirements of the NPPF.	
305	HG2-44 Clarence Road (land at), Horsforth	Unsound	<p>This site lies within the Newlay Conservation Area and includes two buildings which have been identified as making a positive character to the character of that area.</p> <p>In line with the approach adopted elsewhere, the Site Requirements should include a requirement that these buildings be retained and reused.</p>	<p>Amend the Site Requirements as follows:-</p> <p><i>“This site lies in the setting of the Newlay Conservation Area. The buildings which have been identified as making a positive contribution to the character of the CAs should be retained and reused. Any development should preserve or enhance the character or appearance of the Conservation Area..”</i></p>
307	HG2-45 St Joseph’s, Outwood Lane, Horsforth	Sound	<p>This site lies within the Horsforth Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
309	HG2-46 Horsforth (former waste water treatment works)	Unsound	<p>This site lies within the Newlay Conservation Area. This site is identified as a Key Green Area in the Conservation Area Appraisal.</p> <p>When the Conservation Area was originally designated, there must have been an acceptance that this open area contributed towards the character or appearance of the area. Therefore, one might</p>	(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in</p>	<p>development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance</p>	
311	HG2-47 Vesper Road (land at), Kirkstall	Sound	<p>This site lies opposite the boundary of Kirkstall Abbey Conservation Area and in proximity to the Abbey Precinct which is a Scheduled Monument..</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of these designated heritage assets in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
313	HG2-48 Weetwood Manor	Unsound	<p>This site lies adjacent to Weetwood Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area</p>	(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the</p>	<p>Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
315	HG2-49 Off Weetwood Avenue, Headingley	Unsound	<p>This site lies within the Weetwood Conservation Area.</p> <p>When the Conservation Area was originally designated, there must have been an acceptance that this open area contributed towards the character or appearance of the area. Therefore, one might conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded</p>



Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance</p>	that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).

Page	Site	Sound/ Unsound	Comments	Suggested change
317	HG2-50 Church Lane, Meanwood	Unsound	<p>This site lies adjacent to the churchyard of Holy Trinity Church which is a Grade II Listed Building. The Lych Gate adjacent to the western corner of this site is also Grade II Listed.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area,</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the nearby Listed Buildings, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of these Listed Buildings and what effect the loss of this site and its subsequent development might have upon the elements which contributes to their significance.</p>	
319	HG2-51 Carr Manor, Meanwood	Unsound	<p>There are four Grade II Listed Buildings around Carr Manor.</p> <p>Whilst the Site Requirements limit</p>	HG2-51 Site Requirements need to clarify precisely how the 15 dwellings are to be

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>the development of this site to 15 dwellings, it is not clear whether this is wholly through the conversion of the existing buildings or whether some residential units are also being considered in the grounds of Carr Manor.</p> <p>If the 15 units are to be provided solely through the conversion of the buildings, this should be made explicit.</p> <p>If, however, additional housing is to be provided in the grounds of the house, then there would need to be an assessment of what contribution its grounds make to the special architectural or historic interest or setting of these Listed Buildings and what effect the any development in them might have upon the elements which contributes to the significance of the four Listed Buildings..</p>	<p>accommodated on the site and, if need be, undertake an assessment of what contribution its grounds make to the special architectural or historic interest or setting of these Listed Buildings and what effect any development might have upon them.</p>
321	HG2-52 Land at Cockroft House, Cardigan Road, Headingley	Sound	<p>This site lies within the Headingley Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
327	MX2-4 Kirkstall District	Sound	Sandford Road County Primary School to the south of this site is a Grade II Listed Building.	-

Page	Site	Sound/ Unsound	Comments	Suggested change
	Centre		Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	

#### Area Proposals 6 – Outer North East

We have the following comment to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
341	HG2-20 Mercure Hotel, Wetherby Road, Wetherby	Sound	This site adjoins the boundary of the Wetherby Conservation Area.  Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.	-
343	HG2-22 Church Street (land east of), Boston Spa	Unsound	This site lies within the Boston Spa Conservation Area.  By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the	(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF. Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation</p>	<p>development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.	
345	HG2-23 Church Street	Unsound	<p>This site lies within the Boston Spa Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or,</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF. Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.	that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).
349	HG2-26 Wetherby Road – Scarcroft Lodge, Scarcroft	Sound	<p>This site lies within the Scarcroft Conservation Area. In addition, Scarcroft Lodge, at the centre of this site, is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment, especially the requirement that the Listed Building should be brought back into use. We also support the limitations on the extent of new build that will be permitted. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area and the Listed Building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-



Page	Site	Sound/ Unsound	Comments	Suggested change
352	MX2-33 Headley Hall, Bramham Leeds	Unsound	<p>The development of this site could affect elements which contribute to the significance of a number of heritage assets:-</p> <ul style="list-style-type: none"> <li>• This site includes two Grade II Listed Buildings (the barn on the north side of the farmyard adjacent to Headley Hall and the former aircraft hangar south-east of Headley Hall) and there are a number of Listed Buildings in the neighbouring Selby District.</li> <li>• The edge of the development would be 675 metres from the boundary of the Bramham Conservation Area. The Conservation Area Appraisal identifies a key long range view from the Conservation Area across the area of this new settlement.</li> <li>• The western edge of the development area lies less than 350 metres from the Grade I Registered Historic Park and Garden at Bramham Park.</li> </ul> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest of the Listed Buildings, to the character or appearance of the Conservation Area, or to the setting of the Registered Historic Park and Garden or what harm</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the designated heritage assets in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these designated heritage assets, then the Plan needs to set out the measures by which that harm might be removed or reduced, including identification of areas that need to remain undeveloped..</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these designated heritage assets, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>might result to those elements which contribute to their significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition:-</p> <ul style="list-style-type: none"> <li>• There is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</li> <li>• The Council has a statutory duty under the provisions of</li> </ul>	required by NPPF, Paragraph 133 or 134).

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <ul style="list-style-type: none"> <li>• National policy guidance makes it clear that Grade I Historic Parks and Gardens are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional.</li> </ul> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to these designated heritage assets, or, indeed, what measures the Plan might need to put in place in order to ensure that any harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, the provisions of the 1990 Act, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution</p>	

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>this currently-undeveloped area makes to those elements which contribute to significance of these assets and what effect the loss of this site and its subsequent development might have upon those elements which contribute to their significance.</p> <p>[It should be noted that although the allocation lies between two Roman Roads and, as a result, there is a high likelihood of archaeological remains on the site, there are no Scheduled Monuments]</p>	

#### Area Proposals 7 – Outer North West

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
367	HG2-14 East Chevin Road, Otley	Sound	<p>This site lies within the boundary of the Otley Conservation Area. The Conservation Area Appraisal identified the existing buildings on this site as detracting from the character of the area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
369	HG2-15 Green Acres and Equestrian Centre	Sound	<p>This site adjoins the boundary of the Bramhope Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
371	HG2-16 Creskeld Lane, Bramhope	Unsound	<p>Part of this site lies within the Bramhope Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>enhancing the character or appearance” of its Conservation Areas.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).
373	HG2-17 Breary Lane East, Bramhope	Unsound	<p>The majority of this site adjoins the boundary of the Bramhope Conservation Area with the fields at the northern end of the site lying within the designated area. The Conservation Area Appraisal identifies key mid-distance views across this site from the Conservation Area.</p> <p>When the Conservation Area was originally designated, there must have been an acceptance that this</p>	(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>open area at the north of this site contributed towards the character or appearance of the area. Therefore, one might conclude that the loss of this space would be likely to harm an element which contributes towards the significance of the Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through</p>	<p>significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF. Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance</p>	
375	HG2-18 Church Lane, Adel	Unsound	<p>This site lies adjacent to the boundary of Adel Conservation Area. The Conservation Area Appraisal identifies important long-distance views across this site from the Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that</p>



Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an</p>	<p>the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.	
377	MX2-1 Westgate – Ashfield Works, Otley	Unsound	<p>This site lies within the Otley Conservation Area. The Conservation Area Appraisal identified a number of buildings on this site as making a positive contribution to the character of the Conservation Area.</p> <p>The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas and the NPPF makes it clear that the loss of a building which makes a positive contribution to the significance of a Conservation Area should be regarded as resulting in substantial harm to that area.</p> <p>Consequently, the Site Requirements should make it clear that the buildings which make a positive contribution to the Conservation Area will be expected to be retained and reused.</p>	<p>Site Requirements MX2-1, first Paragraph, add the following:-</p> <p><i>“The Otley Conservation Area Appraisal identifies a number of buildings on this site as making a positive contribution to the character of the Conservation Area. These should be should retained and reused in any development proposals for this site”</i></p>
379	MX2-2 Westgate, Otley	Sound	This site lies within the boundary of the Otley Conservation Area. The Conservation Area Appraisal	-

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>identified the existing buildings on this site as detracting from the character of the area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	
386	EG2-2 Land off Ilkley Road, Otley	Sound	<p>This site lies close to the boundary of the Otley Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
388	EG2-3 Land off Ilkley Road, Otley	Sound	<p>This site lies close to the boundary of the Otley Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-

### Area Proposals 8 – Outer South

We have the following comment to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
404	HG2-177 Alma Villas (site at), Woodlesford	Sound	<p>This site lies adjacent to the boundary of the Woodlesford Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
406	HG2-178 Aberford Road – site of Glenoit and Minerva Mills, Oulton	Sound	<p>The Eshadwell Brewery building adjacent to this site is a Grade II Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-
410	HG2-180 Land between Fleet Street Lane and Methley Lane, Oulton	Unsound	<p>This site adjoins the boundary of the Oulton Conservation Area. The Conservation Area Appraisal identifies key views towards the Conservation Area across this land.</p> <p>By allocating this site for</p>	(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation</p>	<p>what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
423	MX2-2 Aberford Road, Oulton	Sound	<p>This site lies adjacent to the boundary of the Woodlesford Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-

#### Area Proposals 9 – Outer South East

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
441	HG2-129 Ash Tree	Sound	This site lies 37 metres from the edge of Manor Garth Hill ringwork.	

Page	Site	Sound/ Unsound	Comments	Suggested change
	School, Kippax		<p>This is a Scheduled Monument.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Scheduled Monument in line with the requirements of the NPPF.</p>	
443	HG2-130 25-29 High Street, Kippax	Sound	<p>33-37 High Street is a Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	

#### Area Proposals 10 – Outer South West

We have the following comment to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
470	HG2-136 Whitehall Road (south of) - Harpers Farm	Sound	<p>Harper House and attached barn is a Listed Building.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of this building in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
482	HG2-142 Whitehall Road (off), Dringhlinton	Sound	<p>This site lies just over 40 metres from the boundary of the Registered Battlefield at Adwalton.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Battlefield in line with the requirements of the NPPF.</p>	-
486	HG2-144 Westfield Farm, Dringhlinton	Factual correction	The development of this area is unlikely to affect any Listed Buildings nearby.	Delete the Site Requirements relating to Listed Buildings.
510	HG2-156 Rod Mills Lane, High Street, Morley	Unsound	<p>This site forms the grounds associated with the two Grade II Listed Buildings at Croft House. Most of it also lies within the Morley Conservation Area.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the two Listed Buildings or to the Conservation Area or what harm might result to those elements which contribute to their significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of either the Listed Buildings or the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p>



Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>conservation and enjoyment of the historic environment.</p> <p>In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area or to the two Listed Buildings, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering</p>	<p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of any of these designated heritage assets, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of the Listed Buildings and to the character of the Conservation Area what effect the loss of this site and its subsequent development might have upon the elements which contribute to their significance.</p>	
525	HG2-167 Old Thorpe Lane, Tingley	Unsound	<p>Black Gates House is a Grade II Listed Building.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development. Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas)</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to this Listed Building, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area</p>	<p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			makes to those elements which contribute to the special architectural or historic interest or setting of this Listed Building and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.	
527	HG2-168 Haigh Wood, Ardsley	Factual correction	The development of this area is unlikely to affect any Listed Buildings in the vicinity.	Delete the Site Requirements relating to Listed Buildings.
531	HG2-170 Land off Haigh Moor Road	Factual correction	The development of this area is unlikely to affect any Listed Buildings in the vicinity.	Delete the Site Requirements relating to Listed Buildings.

#### Area Proposals 11 – Outer West

We have the following comments to make regarding the proposed allocations in this part of the City:-

Page	Site	Sound/ Unsound	Comments	Suggested change
572	HG2-53 Calverley Cutting/ Leeds Liverpool Canal, Apperly Bridge	Unsound	<p>This site adjoins the boundary of the Calverley Conservation Area in Leeds and lies close to the eastern extent of the Leeds Liverpool Canal Conservation Area in Bradford.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the two Conservation Areas or what harm might result to those</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the two Conservation Areas and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>elements which contribute to the significance of those designated areas by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the two Conservation Areas, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution</p>	<p>elements which contribute to the significance of the Conservation Areas, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of either of the Conservation Areas, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			which this currently-undeveloped area makes to the character or appearance of the Conservation Areas, and what effect the loss of this site and its subsequent development might have upon the elements which contributes to their significance.	
575	HG-55 Calverley House		<p>There are two Grade II Listed Buildings immediately to the north-east of this site. It also adjoins the Calverley Conservation Area on two of its sides.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or to the Conservation Area or what harm might result to those elements which contribute to their significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and the adjacent Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of either the Listed Buildings or the Conservation Area, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of any of</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>There is also a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area or to this Listed Building, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the</p>	<p>these designated heritage assets, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of this Listed Building and to the character of the Conservation Area what effect the loss of this site and its subsequent development might have upon the elements which contributes to their significance.</p>	
577	HG2-56 Rodley Lane (land at), Calverley Lane, Calverley	Unsound	<p>The development of this site would reduce the gap between the Calverley Conservation Area and the edge of the built-up area of Rodley to 108 metres.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the character or appearance of the Conservation Area or what harm might result to those elements which contribute to the significance of this designated area by its eventual development.</p> <p>Paragraph 126 of the NPPF</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to the elements which contribute towards the significance of the Conservation Area and what impact the loss of this undeveloped site and its subsequent development might have upon those significances.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of the Conservation Area, then</p>



Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, the Council has a statutory duty under the provisions of S72 of the Planning (Listed Buildings and Conservation Areas) Act, 1990 to pay “special attention” to “the desirability of preserving or enhancing the character or appearance” of its Conservation Areas. The NPPF makes it clear that the significance of heritage assets, such as Conservation Areas, can be harmed through development within their setting.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Conservation Area, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant with, either, the statutory duty placed upon the Council under the provisions of the 1990 Act, or the requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of the contribution which this currently-undeveloped area makes to the character or appearance of the Conservation Area, and what effect the loss of this site and its subsequent development might have upon</p>	<p>the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Conservation Area, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			the elements which contributes to its significance.	
585	HG2-63 Woodhall Road (land adjoining) - Gain Lane, Thornbury	Unsound	<p>The farm buildings at Gain Lane Farm at the south-eastern edge of this site are Grade II Listed.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.</p> <p>Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to this Listed Building, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of this Listed Building and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
593	HG2-67 Owlcotes Farm/ Owlcotes Gardens,	Unsound	This site lies less than 220 metres from the edge of Owlcotes Deserted Medieval Village. This is a Scheduled Monument.	(1) An assessment needs to be undertaken of the contribution which this site makes to the setting of the Scheduled

Page	Site	Sound/ Unsound	Comments	Suggested change
	Pudsey		<p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the Scheduled Monument or what harm might result to those elements which contribute to its significance by its eventual development.</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Scheduled Monuments are considered to be in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional. The allocation of this site could, potentially, harm elements which contribute towards the significance of this Scheduled Monument .</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to the Scheduled Monument or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the</p>	<p>Monument and what impact the loss of this open area and its subsequent development might have upon its significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of this Scheduled Monument, then the Plan needs to be set out how that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of the Scheduled Monument, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>requirements of the NPPF.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to the Scheduled Monument and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
602	HG2-72 Land off Tyersal Court, Tyersal	Unsound	<p>There is a Group of Listed Buildings around Tyersal Hall including Tyersal Hall itself which is a Grade II* Listed Building. This Allocation would bring development to within 320 metres of this group.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development .</p> <p>Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional.</p> <p>In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to this Listed Building, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the</p>	<p>contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of this Listed Building and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
604	HG2-72 Land off Tyersal Court, Tyersal	Unsound	<p>There is a Group of Listed Buildings around Tyersal Hall including Tyersal Hall itself which is a Grade II* Listed Building. This Allocation would bring development to within 420 metres of this group.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development . Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>conservation and enjoyment of the historic environment. In addition, national policy guidance makes it clear that Grade I and II* Listed Buildings are regarded as being in the category of designated heritage assets of the highest significance where substantial harm to their significance should be wholly exceptional.</p> <p>In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to this Listed Building, or, indeed,</p>	<p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>



Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of this Listed Building and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
606	HG2-74 Station Street., Pudsey	Factual correction	The development of this area is unlikely to affect any Listed Buildings nearby.	Delete the Site Requirements relating to Listed Buildings.
607	HG2-75 Musgrave House, Crawshaw Road, Pudsey	Sound	<p>This site lies adjacent to the boundary of the Pudsey Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	-

Page	Site	Sound/ Unsound	Comments	Suggested change
614	HG2-81 Land off Gamble Lane	Unsound	<p>The development of this site would bring development to within 130 metres of Beulah Farmhouse to the west of this area and within 350 metres of a group of four Grade II Listed Buildings around Farnley Hall to the south.</p> <p>By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the special architectural or historic interest or setting of the Listed Building or what harm might result to those elements which contribute to its significance by its eventual development. Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment.</p> <p>In addition, there is a requirement under S66 of the Planning (Listed Buildings and Conservation Areas) Act that “special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. Although this requirement only relates to the determination of planning applications, failure to take account of this requirement at this stage may mean that, when</p>	<p>(1) An assessment needs to be undertaken of the contribution which this site makes to those elements which contribute towards the significance of the Listed Buildings in its vicinity and what impact the loss of this undeveloped site and its subsequent development might have upon their significance.</p> <p>(2) If it is considered that the development of this site would harm elements which contribute to the significance of these buildings, then the Plan needs to set out the measures by which that harm might be removed or reduced.</p> <p>(3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of these Listed Buildings, then this site should not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134).</p>

Page	Site	Sound/ Unsound	Comments	Suggested change
			<p>a Planning Application is eventually submitted for this area, even though a site is allocated for development in the Local Plan, the need to pay special regard to the desirability of preserving this Listed Building or its setting may mean that, either, the anticipated quantum of development is undeliverable or the site cannot actually capable of being developed.</p> <p>In the absence of any assessment of the degree of harm which this proposed Allocation might cause to this Listed Building, or, indeed, what measures the Plan might need to put in place in order to ensure that this harm is minimised, the Plan cannot demonstrate that the allocation of this area is compliant the requirements of the NPPF, or that the site is capable of delivering the quantum of development anticipated.</p> <p>Before allocating this area, therefore, there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the special architectural or historic interest or setting of this Listed Building and what effect the loss of this site and its subsequent development might have upon the elements which contributes to its significance.</p>	
622	HG2-200 Stanningley	Unsound	This site adjoins the boundary of the Armley Conservation Area. In	Amend the Site Requirements as

Page	Site	Sound/ Unsound	Comments	Suggested change
	Road, Leeds		<p>addition, Winkler Green Mill (to the east of this site) and the gate piers to Armley Park (to the north) are Grade II Listed Buildings.</p> <p>In line with the approach adopted elsewhere, the proximity of the Conservation Area and these Listed Buildings and the need to ensure that development proposals safeguard the elements which contribute to their significance should be referred to in the Site Requirements</p>	<p>follows:-</p> <p>“Listed Buildings This site is in the setting of a number of Listed Buildings. Any development should preserve their special architectural or historic interest and setting.</p> <p>Conservation Areas The site adjoins the boundary of the Armley Conservation Area. Any development should preserve or enhance the character or appearance of the Conservation Area”</p>
624	MX2-5 Waterloo Lane, Leeds	Factual correction	The development of this area is unlikely to affect any Listed Buildings nearby.	Delete the Site Requirements relating to Listed Buildings.
626	MX2-6 Wortley Low Mills, Whitehall Road	Factual correction	The development of this area is unlikely to affect any Listed Buildings nearby.	Delete the Site Requirements relating to Listed Buildings.
633	HG7-2 Land on the corner of Tong Road and Lakeside Road, Wortley	Unsound	<p>There is a group of four Grade II Listed Buildings at Stonebridge Mill to the west of this area.</p> <p>In line with the approach adopted elsewhere, the proximity of the these Listed Buildings and the need to ensure that development proposals safeguard the elements which contribute to their significance should be referred to in the Site Requirements</p>	<p>Amend the Site Requirements as follows:-</p> <p>“Listed Buildings This site is in the setting of a number of Listed Buildings. Any development should preserve their special architectural or historic interest and setting”.</p>
639	EG2-7 Stanningley	Sound	This site lies close to the boundary of Bramley Town	-

Page	Site	Sound/ Unsound	Comments	Suggested change
	Road and Swallow Road, Pudsey		<p>Conservation Area.</p> <p>Therefore, we welcome the Site Requirements relating to the historic environment. These will help to ensure that the site is developed in a manner which will safeguard the significance of the Conservation Area in line with the statutory duty under the 1990 Act and the requirements of the NPPF.</p>	
641	EG2-8 Land at former Kirkstall Power Station	Unsound	<p>The development of this site could also affect the setting of Armley Conservation Area, to the south, and the Grade II Registered Historic Park and Garden at Armley House (to the west).</p> <p>In line with the approach adopted elsewhere, the proximity of the these heritage assets and the need to ensure that development proposals safeguard the elements which contribute to their significance should be referred to in the Site Requirements</p>	<p>Amend the Site Requirements as follows:-</p> <p><i>“Conservation Areas This site is in lies close to the boundary of Armley Conservation Area . Any development should preserve the character or appearance of the Conservation Area or its setting</i></p> <p><i>Historic Park and Garden The site lies opposite the Historic Park and Garden at Armley House. Any proposals should safeguard those elements that contribute to the significance of this park”.</i></p>

If you have any questions regarding the points raised above or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully,

**Ian Smith**

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