

Statement of Common Ground between Leeds City Council and Historic England

Representation No(s) and Stage

PDE00315 (Publication Draft)

PNE00535 (Outer North East Revised Publication Draft)

PSE00424 (Pre Submission Changes)

PRE00076 (Revised Submission Draft)

M7/3, M7/3a, M7/3AMI, M7/3/AMIa (Statements submitted Matter 7)

Site Allocations Plan Examination

Leeds Local Plan



1. Introduction

- 1.1 This statement of common ground has been prepared jointly between “the Parties” consisting of Leeds City Council (‘the Council’) and Historic England.
- 1.2 The statement sets out the areas of common ground between the Parties with regard to the Leeds City Council Revised Submission draft Site Allocations Plan submitted March 2018 **CDR1/1** (‘the Plan’). These form issues which Historic England do not seek to pursue during the examination of the Plan. The statement also highlights the key areas of uncommon ground between the Parties. The statement is intended to assist the Inspectors during the examination of the Plan.

2. Background

- 2.1 Historic England raised concerns with the Council’s approach to the historic environment at Publication stage of the Plan. Following Publication Stage the Council prepared a Heritage Background Paper (**CD1/33**). This partly addressed the concerns of Historic England.
- 2.2 The following objections submitted at Publication Draft stage were withdrawn by Historic England in response to the Pre Submission Changes consultation (**PSE00424**):
 - HG2-38 Dunstarn Lane (land south), Adel
 - HG2-16 Creskeld Lane, Bramhope
 - HG2-180 Land between Fleet Street Lane and Methley Lane, Oulton
 - HG2-170 Land off Haigh Moor Road
 - HG2-67 Owlcoates Farm, Owlcoates Gardens, Pudsey
 - HG3-29/HG3-16 (formerly HG2-81) Land off Gamble Lane
- 2.3 In response to the Inspectors ‘Further Questions’ to the Council, it submitted a table summarising Historic England’s representation in response to the Pre-Submission Changes by HMCA and site (**EX2c**).
- 2.4 The Councils response notes where Historic England’s concerns raised at Publication Draft stage were addressed by the Pre-Submission Changes. For clarification, 60 out of the 73 Pre-Sub Changes are considered sound by Historic England (subject to occasional factual correction).
- 2.5 Historic England responded to the Councils consultation on the Revised Submission Draft Plan (**PRE00076**). Historic England have submitted three Statements to the Inspector (**M73M7, M73a, M73AMI**) in response to the Councils Revised Submission Draft Plan.
- 2.6 Paragraph 11.7 of the Revised Submission Draft Background Paper Updated (**CDR1/4b**) states that ‘*No changes are proposed as a result of the Broad Locations work. Some of the sites within the Background Paper CD1/33 are now proposed as Broad Locations rather than allocations. The heritage*

assessments remain relevant evidence for future consideration of broad locations in a plan review.'

3 Common Ground

- 3.1 The Parties agree that Policy HG7 is sound.
- 3.2 It is agreed that HG2-208 Globe Quay, Globe Road, Holbeck, City Centre HMCA is sound subject to proposed Main Modification **(30)** which states:
"The site includes a Listed Building and there are several others in its vicinity. Any development should preserve the special architectural or historic interest of Listed Buildings and their setting".
- 3.3 It is agreed that HG2-209 The Faversham, Springfield Mount, City Centre HMCA is sound subject to proposed Main Modification **(31)** which states:
"There is a Listed Building adjacent to this site. Any development should preserve the special architectural or historic interest of Listed Buildings and their setting".
- 3.4 It is agreed that MX2-35 Temple Works Mixed Use Site City Centre HMCA, is sound subject to proposed Main Modification **(38)** which states: "*The site includes a number of Listed Buildings associated with the Grade I Listed Marshall Mills and there are a number of others in close proximity. Any development should preserve the special architectural or historic interest of Listed Buildings and their setting."*
- 3.5 It is agreed that MX2-38 Barrowby Lane, Manston, East HMCA is sound subject to proposed Main Modification **(44)** which states; "*Scheduled Monument Site Requirements – This area lies close to the site of the former World War I National Filling Factory at Barnbow. This is a Scheduled Monument. Any development should safeguard those elements which contribute to the significance of this area*".
- 3.6 It is agreed that Policy BL1 is sound.
- 3.7 The main modifications listed above are included in the table of 'Proposed Further Modifications to the Submission Plan' **(EX9b)**.

4. Uncommon Ground

- 4.1 Historic England is of the opinion a Main Modification is required to insert additional text to the end of Paragraph 2.55a (page 19) of the Plan to read: -
"As part of any review, there would need to be an assessment of the conformity of each of these areas with national policy guidance and Local Plan policies and the degree to which they would be likely to deliver sustainable development."

4.1.1 The Council do not agree, as any review of the Plan would be bound to be undertaken in accordance with National Policy, guidance and the Local Plan, the suggested proposed Main Modification would therefore introduce unnecessary wording and duplicate a requirement secured elsewhere by the planning system. Paragraph 2.55a is sound as drafted.

4.2 Historic England is of the opinion BL1-8 Coach Road/Park Road, Guiseley, Aireborough HMCA is unsound because it is not clear how the capacity will be achieved at the same time as delivery of a school on the site (**PSE00424**). Notwithstanding that this is a 'Broad Location', the Council remain of the view that the designation is sound as further work regarding capacities will be undertaken at Planning Application stage when further details are required.

4.3 Historic England is of the opinion BL1-9 Gill Lane, Yeadon, Aireborough HMCA is unsound (**PRE00076**) & (**PSE00424**). Historic England suggest that a Main Modification is required to amend the designation as follows;

- Policy BL1 of the Plan, page 54 reduce the size of the Site Area to 1.9ha and the Site Capacity is adjusted accordingly.

4.3.1 The Council remain of the view that the size of the site area and capacity should not be adjusted as it may prevent opportunity to enhance Nether Yeadon Conservation Area and the listed buildings. As such, the Council considers the designation of this site as drafted sound.

4.4 Historic England is of the opinion BL1 -14 South of A65 from Horsforth and Rawdon RA to crematorium, North, HMCA is unsound (**PRE00076**) (**PSE00424**). Historic England suggests that a main modification is required to the designation as follows;

- Policy BL1 of the Plan, page 308, reduce the size of the Site Area to 23ha and the Site Capacity is adjusted accordingly.

4.4.1 The Council remain of the view that the size of the site area and capacity should not be adjusted. The size of the site area and capacity change is considered to provide flexibility to enable development to be in the least sensitive area of the site reflecting concerns raised by Historic England.

4.4.2 The Council considers the designation of this site as drafted sound and acknowledge that this designation does have an area of sensitivity that extends from the group of Listed Buildings at Low Hall to Rawdon Road along Bar Lane but remain of the view that the Broad Location could be developed sensitively in a way that relates well to the setting of the designated Heritage Assets and character of Cragg Wood Conservation Area. The Council remain of the view that this designation is sound and a site requirement will be proposed if the site allocated for housing in the Review of the SAP.

4.5 Historic England is of the opinion BL1-15, Off Weetwood Avenue, Headingley, North HMCA is unsound (**PRE00076**) & (**PSE00424**). Historic England suggests that the Broad Location should be deleted from the SAP.

4.5.1 The Council are of the view that this location could accommodate future growth subject to future review of the SAP providing sufficient mitigation is secured with regards to the conservation of heritage assets.

4.6 In Historic England's opinion MX2-39, Parlington, Outer North East HMCA is unsound (**PRE00076**) & (**PSE00424**). Historic England suggests that the site should be deleted from the SAP.

4.6.1 The Council disagrees and consider that the site should remain in the Plan as an allocation.

4.7 In Historic England's opinion BL1-42, Parlington, Outer North East HMCA is unsound (**PRE00076**) (**M7/3**), (**M7/3a**). Historic England suggests that the Broad Location should be deleted from the SAP.

4.7.1 The Council disagrees and consider that the site should remain in the Plan as a Broad Location.

4.8 In Historic England's opinion HG2-17 Breary Lane East, Bramhope Outer North West HMCA is unsound (**PSE00424**). Historic England suggests that a Main Modification to the allocation is required as follows;

- Amend the wording of the Conservation Area Site Requirement to state *“A significant buffer will also be required to the southern boundary with the A660.”*

4.8.1 The Council are of the view that the Conservation Area Site Requirement as currently worded sufficiently addresses the need for additional landscaping to be provided to the southern boundary with the A660 and is therefore both appropriate and adequate to be sound. The Council acknowledge that land to the south of the Grade II Listed Building (High Ridge Farmhouse) is an area of sensitivity but remains of the view that Site Requirements will sufficiently achieve development in a manner that avoids or minimises conflict between the conservation of heritage assets and any aspect of the proposal. Furthermore development of the site has recently been granted Planning Permission (17/02312/RM approved 21.11.2017); therefore the Conservation Area Site Requirement and identified 'Area of Sensitivity' should remain unchanged. As such, the allocation is considered sound.

4.9 In Historic England's opinion HG2-18, Church Lane, Adel, Outer North West HMCA is unsound (**PSE00424**). Historic England suggests that a Main Modification to the allocation is required as follows;

- Reduce the extent of the allocation by removing the area identified as 'High Sensitivity' in the Heritage Background Paper on the plan shown on page 149 (CD1/33) that lies to the west of the Grade I Listed Church of St John the Baptist.

4.9.1 The Council acknowledge that land to the west of the Grade I Listed Building Church of St John the Baptist is an 'area of sensitivity' but remain of the view that the Site Requirements will achieve development in a manner that avoids or minimises conflict between the conservation of heritage assets and any aspect of the proposal. In any event, the site has been granted outline planning permission 16/06222/OT; therefore the identified 'Area of Sensitivity' should remain unchanged. As such, the allocation is considered sound.

Confirmed as agreed:

A handwritten signature in blue ink, appearing to read 'Ian Smith'.

Name: Ian Smith

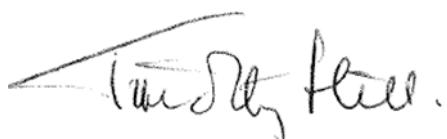
Organisation: Historic England

Date: 6th July 2018

Name: Tim Hill
Role Chief Planning Officer

On behalf of Leeds City Council

Date: 06th July 2018

A handwritten signature in blue ink, appearing to read 'Tim Hill'.