

**TRANSPORT AND WORKS ACT 1992**  
**TRANSPORT AND WORKS (INQUIRIES PROCEDURES) RULES 2004**  
**NETWORK RAIL (LEEDS TO MICKLEFIELD ENHANCEMENTS) ORDER**

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**HERITAGE & THE LISTED BUILDING CONSENT APPLICATIONS**  
**PROOF OF EVIDENCE**  
**OF**  
**AMY JONES**

Document Reference	CD 7.32
Author	Amy Jones
Date	15 February 2024

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## **1 INTRODUCTION**

### **1.1 Qualifications and Experience**

1.1.1 I am a Technical Director at AECOM Ltd. I have a BA in Archaeology and Ancient History (University of Birmingham) and an MA in the Archaeology of Buildings (University of York) and am a full member of the Chartered Institute of Archaeology. I have 22 years' experience of working within the historic environment profession.

1.1.2 I have been the Lead Heritage Consultant for the proposed Leeds to Micklefield Enhancements Scheme since March 2019. I have managed a team of heritage professionals in writing heritage assessments to accompany the Environmental Report and authored supporting evidence for the four Listed Building Consent applications being considered at this Inquiry.

1.1.3 My evidence is concerned with the likely impacts and effects on the historic environment in relation to the works associated with the Network Rail (Leeds to Micklefield Enhancements) Order and the Listed Building Consents.

### **1.2 Structure of the Proof of Evidence**

1.2.1 My evidence presents an overview of the harm caused to the historic environment from the construction of the Order Scheme. I will discuss:

- (a) Key aspects and significance for the historic environment along this part of the Transpennine route, including the listed buildings<sup>1</sup> subject to consent applications;
- (b) The legislation and planning framework applicable to the applications;
- (c) Design evolution and optioneering process applied in consideration of the significance of the historic significance;
- (d) Engagement process and outcomes with historic environment stakeholders, namely Historic England and Leeds City Council;
- (e) Assessment of the effect of the Order Scheme works on the historic environment and the subject of the Listed Building Consent applications, including embedded mitigation; and
- (f) Responses to objections and representations to the application.

1.2.2 The Secretary Of State for Culture, Media & Sport, in the Statement of Matters issued on 20th December 2023, has identified 4 Matters pertaining to the listed building applications (Matters 8-12). These are the extent to which they are in accordance with the current development plan, and any emerging development plan, and the weight that should be given to this, alongside the extent to which the works accord with national planning policy, in particular the desirability of sustaining or enhancing the

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<sup>1</sup> Listed Buildings are buildings and structures defined by the Secretary of State as being of "special architectural or historic interest" under the Planning (Listed Buildings and Conservation Areas) Act 1990.

character and appearance of the heritage assets, and if consent is granted, any conditions to ensure they are carried out in a satisfactory manner. Issues relating to the substantive assessment of heritage issues as identified by the Secretary of State relating to heritage are covered by this proof. However, compliance of the scheme against heritage policies as part of an overall appraisal of planning policy, as well as the weight to be given to both existing and emerging development plan documents is dealt with in the evidence of Mr Rivero.

- 1.2.3 A list of putative conditions has been provided with the Listed Building Consent application for each of the structures (**CD 1.18.11; CD 1.18.18; CD 1.18. 27; and 1.18.30**). It is understood that these are likely to be the subject of discussion at a specific condition's session at the Inquiry.

## **2 Scope of Evidence**

### **2.1 Legislative and Policy Framework**

*Planning (Listed Building and Conservation Areas) Act, 1990 (as amended)*

- 2.1.1 Under Chapter II of the Act, listed buildings are protected against unauthorised works, being those works not authorised by the local planning authority or the Secretary of State. This process is embodied within Listed Building Consent (LBC) process. The Act further states that 'the local planning authority or, as the case may be, the Secretary of State may grant or refuse an application for listed building consent and, if they grant consent, may grant it subject to conditions' (Section 16 (1)). In considering whether to grant consent, the local planning authority or the Secretary of State 'shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historical interest which it possesses' (Section 16(2)).
- 2.1.2 Section 17 of the Act deals with conditions attached to a Listed Building Consent, and provides that, without prejudice to the generality of Section 16(1), consent may be granted subject to conditions including conditions with respect to the preservation of particular features, making good after completion of the works and use of original materials. Section 17 (2) states that a condition 'may also be imposed requiring specified details of the works (whether or not set out in the application) to be approved subsequently by the local planning authority or, in the case of consent granted by the Secretary of State, specifying whether such details are to be approved by the local planning authority or by him'.
- 2.1.3 In considering whether to grant planning permission which affects a listed building, Section 66 (1) of the Act requires that the local planning authority, or the Secretary of State 'shall 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'. Section 72 makes similar provision in respect of buildings or land in a conservation area, with Section 72(1) providing that in exercising planning functions listed in Section 72(2), which include deciding whether to grant planning permission, 'special attention shall be paid to the desirability of conserving or enhancing the character or appearance of the area'

*National Planning Policy Framework (NPPF; MHCLG December 2023)*

- 2.1.4 The NPPF sets out the Government's planning policies for England and how these should be applied to contribute to the achievement of sustainable development. Section 16 of the NPPF sets out a series of policies that are a material consideration to be taken into account in development management decisions in relation to the heritage consent regimes established in the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.1.5 Paragraphs 205 to 209 of the NPPF address heritage assets being harmed or lost through alteration or destruction or development within their setting. With regard to designated heritage assets<sup>2</sup>, paragraph 205 states that great weight should be given to an asset's conservation and the more important the asset, the greater the weight should be. Distinction is drawn between those assets of exceptional interest (e.g. grade I and grade II\* listed buildings), and those of special interest (e.g. grade II listed buildings). Any harm or loss of heritage significance requires clear and convincing justification, and substantial harm or loss should be wholly exceptional with regard to those assets of greatest interest (paragraph 206).
- 2.1.6 In instances where development would cause substantial harm to or total loss of significance of a designated asset, consent should be refused unless that harm or loss is 'necessary to achieve substantial public benefits that outweigh that harm or loss' (paragraph 207). In instances where development would cause less than substantial harm to the significance of a designated asset, the harm should be weighed against the public benefits of the proposal including its optimum viable use (paragraph 208).

*Local Planning Policy*

- 2.1.7 The Leeds Core Strategy Policy P11: Conservation Leeds City Council recognises the importance of heritage in shaping the city and aims to conserve and enhance the historic environment. Specific note is made in the local plan policy of the contribution made by the 19th century transport network (**CD 2.14**).
- 2.1.8 Within the saved policies of the Leeds Unitary Development Plan (**CD 2.15**), there are a number of policies specific to the historic environment. With regard to listed buildings this includes:
- (a) Policy N14: there will be a presumption in favour of the preservation of listed buildings. Consent for the demolition or substantial demolition of a listed building will be permitted only in exceptional circumstances and with the strongest justification.
  - (b) Policy N17: wherever possible, existing detailing and all features, including internal features, which contribute to the character of the listed building should be preserved, repaired or if missing replaced.
- 2.1.9 Also of relevance, is Policy N13 which states that 'the design of all new buildings should be of high quality and have regard to the character and appearance of their

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<sup>2</sup> Defined in the Glossary in Annex 2 to the NPPF as 'A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation'.

surroundings. Good contemporary design which is sympathetic or complementary to its setting will be welcomed.'

### **3 Key Aspects of the Historic Environment**

- 3.1 During the early Medieval period, West Yorkshire had an agrarian based economy. Settlements consisted of small, nucleated villages, surrounded by regular and extensive open field systems. Towards the 15th and 16th centuries there was a shift towards an industrial based economy, the textile industry emerging first in Halifax and the Upper Calder valley.
- 3.2 By the early 17th century, the focus of the economy had shifted from agrarian to industrial, the coal fields providing a source of fuel for industry. Combined with the local availability of raw materials such as wool and the improving transport networks, rapid growth was experienced in textile and other manufacture during the industrial period. The industrial transformation of West Yorkshire meant that by the early 19th century towns were rapidly expanding. Quarries became large scale in the rural areas, workers' housing was constructed on a large scale and suburbs were developing.
- 3.3 A Leeds and Selby canal was proposed in 1769 in order to compete with the Leeds and Calder Navigation which provided the main transport route for moving raw and manufactured goods. A route was surveyed but the plans failed and attention soon turned to the railways instead. From 1814 the Leeds Mercury Newspaper had been promoting the idea of a Leeds to Selby railway and a Leeds and Hull railroad was formed in 1824. A route for the Leeds to Hull railway via Selby was surveyed by George Stephenson and Joseph Locke but received little support due to both financial constraints and the difficult terrain. At a meeting in 1829 the Leeds and Selby railway company was founded, reviving a shortened version of the Leeds and Hull railway. The route was resurveyed by James Walker, a prominent engineer who worked principally on marine works and docks, but who had previously provided advice to Stephenson on the Liverpool and Manchester line. The Leeds and Selby railway remains his most important railway project.
- 3.4 The historic environment associated with the scheme is focussed on this railway and its impact on the surrounding landscape. The importance of this section of the Transpennine Route lies in its early date forming part of the Leeds to Selby Route dated to the Pioneering phase of railway building.
- 3.5 The Act of Parliament for the Leeds and Selby Railway was authorised in 1830 and it opened to the public in 1834. The line was constructed with a total of 43 bridges and 16 level crossings. Originally it was proposed to construct twin arch bridges to accommodate the four lines, but instead the distinctive single span 'basket' arch was employed, a feature unique to this railway.
- 3.6 Forming part of the railway are a number of designated structures which highlight the importance of the historic railway itself. These structures were designated in 2015 after a comprehensive review of the line.
- 3.7 The reasons for listing mainly focused on the uniform and unusual design attributed to James Walker and William Burges, notably the 'basket' arch bridges. These have

group value, designed to the same aesthetic and local materials. The design also represents an unusual solution to the accommodation of four tracks, although only two were ever constructed. The semi-elliptical 'basket' arch is unique to the Leeds to Selby line and represents a feat of engineering specifically designed for their location. Originally there were 43 bridges across the Leeds to Selby route, 13 of which survive. Those which survive largely unaltered have been designated as grade II listed buildings; however, a number of similar structures survive which, due to subsequent loss of historic fabric and modern intervention, do not meet the high standards of designation, but nevertheless add to the group value of the railway.

- 3.8 Structures associated with original Leeds to Selby railway are regarded to have group value, as part of one of the world's earliest railways. The majority were constructed to a common design, one that was unique to the Leeds to Selby line and represent a feat of engineering specifically designed for their location. Variations to these are limited and largely represent later additions; however, two cast iron bridges were constructed as part of the original line. Only one survives extant, Crawshaw Woods Overbridge (HUL4/20).

## **4 Assessment of the Proposed Scheme**

### **4.1 Assessment Methodology**

- 4.1.1 The assessment of the historic environment was undertaken through the production of technical reports for archaeology and cultural heritage, forming part of the Environmental Report (**CD 1.16**). This provides an assessment of the significance of the historic environment within the context of the works, alongside the likelihood of impacts to this significance. The assessment was undertaken in accordance with guidance produced by Historic England and the Chartered Institute for Archaeologists.
- 4.1.2 The approach to assessment involved consultation of the Historic Environment Record (HER) maintained by West Yorkshire Archaeology Advisory Service (WYAAS) and the National Heritage List for England maintained by Historic England. Reference was also made to recent studies by Alan Baxter Associates<sup>3</sup> into the heritage significance of the Transpennine Route and its constituent parts. This was enhanced by historic research; historic map regression; reading of previous historic environment investigations and survey; historic landscape character and conservation areas review. Site visits to individual assets were also undertaken to capture any impacts on the settings of historic assets and to assess their current condition.
- 4.1.3 For each of the Listed Building Consent applications a Heritage Statement has been prepared which identifies the impacts of the proposals on each structure and assesses the degree of harm caused to significance in terms of substantial or less than substantial. This enables a balanced judgement to be weighed against the public benefits of the scheme. This is consistent with current national and local planning policy within the NPPF and Leeds Core Strategy. The methodology for the assessment was agreed with Historic England and Leeds City Council.

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<sup>3</sup> Alan Baxter and Associates Ltd. 2019. Transpennine Route Upgrade: Route-wide Statement of Significance and Alan Baxter and Associates Ltd. 2014. NTP-E Statement of History and Significance: East of Leeds

4.1.4 The approach to assessment meets the requirements of the National Planning Policy Framework (NPPF, December 2024) which states in Chapter 16, para 200 that: 'As a minimum the relevant historic environment record should have been consulted.' It also states that the significance of any heritage assets affected should be described and that the level of information should be proportionate to the level of importance of the assets and '...no more than is sufficient to understand the potential impact of the proposal on their significance.'

## 4.2 Design Evolution and optioneering

4.2.1 The Order Scheme been developed through an iterative design process which recognises the historic significance of the railway and the individual structures. It has included extensive engagement with Historic England and Leeds City Council. The proposals have been developed to ensure that great weight is given to the conservation of designated heritage assets in accordance with the NPPF paragraph 199. The strategic alternatives for the Scheme are discussed by Mr Vernon in the Needs Case Proof of Evidence (**CD 7.02**) while the design optioneering process specific to the Listed Buildings Consents is set out in the Alternative Options Evaluation Studies (**CD 1.18.12, CD 1.18.19, CD 1.18.28 and CD 1.18.37**) which accompany each application and discussed in the Proof of Evidence of Paul Harrison (**CD 7.05**). All opportunities to enhance the significance of the heritage assets have been explored and included as embedded mitigation.

4.2.2 As Mr Vernon sets out in his evidence, a high level review of strategic alternatives were considered which would deliver the objectives of the Scheme. This included consideration of other modes of transport infrastructure, including the motorway network, alongside other rail schemes. Non-infrastructure alternatives were also considered including new rolling stock; however, challenges remain around performance, reliability, and capacity for both local and express services, which can only be resolved through infrastructure investment.

4.2.3 Due to a lack of feasible strategic options, it was deemed that improvements to the existing North Transpennine Route were the only option available. Once the need for the Scheme was established, a list of alternative options and sub-options were considered and assessed in advance of progressing with the Order application.

4.2.4 As set out in Mr Harrison's Proof and in more detail in the Alternative Options Evaluation Studies (**CD 1.18.12, CD 1.18.19, CD 1.18.28 and CD 1.18.37**) for each listed structure an initial engineering review was undertaken to identify alternative options which would facilitate OLE construction through the structures. This process looked at various high-level options to achieve electrical clearance for the installation of OLE while maintaining the historic fabric.

4.2.5 The outcome of the initial engineering review led to a number of potentially feasible options being identified for each of the four structures which are the subject of Listed Building Consent applications (Austhorpe Lane bridge (HUL4/21); Crawshaw Woods bridge (HUL4/20); Brady Farm bridge (HUL4/15); Ridge Road bridge (HUL4/14)), as set out in the respective Alternative Options Evaluation Study for each of the bridges (**CD 1.18.12; CD 1.18.28; CD 1.18.19; CD 1.18.37**).

- 4.2.6 All options were assessed against set criteria defined in order to allow an objective and consistent assessment of alternative options across all options, outlined in the Alternative Options Evaluation Studies. The criteria included:
- (a) Environment and Consent Risk – addressing environmental concerns, planning risks and consents risk.
  - (b) Land & Property – addressing land access and availability concerns.
  - (c) Cost – addressing capital and maintenance cost constraints.
  - (d) Design / engineering feasibility – to address varying levels of design complexity.
  - (e) Construction – to address varying levels of construction complexity.
  - (f) Maintenance – to address varying levels of maintenance burdens.
  - (g) Deliverability – to address the impact on wider programme timescales.
- 4.2.7 For the four bridges, both track slue and track lower were rejected due to the natural geology of the area which would require extensive rock breakout and re-stabilisation of the adjacent cutting slope, considered to be a high risk construction activity, requiring track closures outside the permitted allowances. Cost was also considered to be prohibitive.
- 4.2.8 The remaining options involved a structural intervention to the bridges in order to achieve the necessary clearance. The different options for each of the bridges, together with the reasons why they were or were not taken forward, are again detailed in the Alternative Options Evaluation Studies and in Mr Harrison's evidence (**CD 7.05**).

### **4.3 Summary of the Public Benefits of the Scheme**

- 4.3.1 The strategic benefits of the Scheme are presented in the Statement of Aims (**CD 1.04**) which accompanies the TWAO application and discussed further in Mr Vernon's Proof. In summary, TRU is an important commitment made by the Secretary of State for Transport that aims to create a better performing railway that passengers can depend on; one that provides more trains, more seats and creates a better-connected North. Specifically, it will support the Government in providing a network which:
- (a) Provides the capacity and connectivity and resilience to support national and local economic activity and facilitate growth and create jobs;
  - (b) supports and improves journey quality, reliability, and safety;
  - (c) supports the delivery of environmental goals and the move to a low carbon economy; and
  - (d) joins up our communities and link effectively to each other.
- 4.3.2 More locally, the Transpennine route is a key transport corridor for providing connections between cities (and Manchester Airport) in the North of England and its

upgrade will support the delivery of economic growth and “levelling up” opportunities across the North of England.

- 4.3.3 The E2 to E4 Project is a key contributor towards the delivery of the TRU and the full realisation of the aims of the overall TRU programme of works.
- 4.3.4 The Scheme includes the construction of OLE to electrify the railway. This will assist in the decarbonisation of the railway network. Electrification also assists with journey time and performance by allowing trains to accelerate faster, and brake more efficiently. The Scheme will improve the provision of public transport (rail) through the local area and across the region in the long term, due to the intended provision of longer, faster and more reliable rolling stock on the route, alongside the reduction in freight across the road network.
- 4.3.5 In section 4.9 of the Leeds City Council Core Strategy (2019) notes that the electrification of the Transpennine route is an important part of its sustainable transport plan. The City Council ‘Connecting Leeds Transport Strategy’ states that “The Transpennine Route Upgrade will enhance connections to Huddersfield and Manchester, providing reliable connections and quicker services.” The delivery of the TRU is a major element of the West Yorkshire Combined Authorities Transport Strategy 2040.
- 4.3.6 Through the implementation of the Scheme there are specific benefits to the historic railway to consider. The purpose of the Scheme is to revitalise the railway; to make it fit for operation in and through the 21st century; and to serve the needs of the local and regional economy and society on both sides of the Pennines. By utilising the existing railway, the Scheme will enable the railway to continue in viable use and in its intended use. In order to achieve that purpose, and given the historic development of the railway, it is inevitable that changes to the historic fabric are required.

## **5 Proposed Works**

### **5.1 Listed Buildings Requiring Consent**

- 5.1.1 The paragraphs below provide a summary of the significance of each of the structures requiring Listed Building Consent. For more detail on the historical development, significance and setting of these structures see the Heritage Assessment Reports (**CD 1.18.01**) Section 9 of the TransPennine Route Upgrade Route-wide Statement of Significance (**CD 1.18.02**) and Section 4 of the NTP-E Statement of Significance: East of Leeds (**CD 1.18.02**).

*HUL4/14 Ridge Road*

#### **Significance**

- 5.1.2 Ridge Road Overbridge (HUL4/14) forms part of the original Leeds to Selby railway built between 1832-4. It was designed by Walker and Burges’ and uses their distinctive single span ‘basket’ arch to carry Ridge Road (the present A656) over the railway.



Plate 1 Ridge Road Bridge

- 5.1.3 The bridge has historic interest as part of the original Leeds to Selby Railway. This interest is reinforced by its association with James Walker. This bridge has additional interest in being the second one constructed at this location, the failure of the first one highlighting the difficulties in achieving its large span.
- 5.1.4 Architecturally the bridge is also of interest due to the high level of craftsmanship and materials used, with attention to detail in ashlar voussoirs and notably its pronounced tooling and curved piers to its parapet. The bridge survives relatively unaltered and in a good structural condition.

### **Optioneering**

- 5.1.5 In its current format, Ridge Road bridge cannot accommodate the OLE due to height restrictions.
- 5.1.6 The Options which were considered to enable the installation of OLE in this location are detailed in the Alternative Options Evaluation Study for Ridge Road bridge (**CD 1.18.37**) and the evidence of Mr Harrison (**CD 7.05**).
- 5.1.7 Having identified the need to pursue an option which involved a structural intervention to the bridge, two main options were considered. Bridge jacking was not considered to be feasible, for the reasons set out in the Alternative Options Evaluation Study. The preferred option was therefore a bridge deck reconstruction.
- 5.1.8 The initial design featured a standard flat concrete deck replacement. This would involve removal of the existing arch superstructure and replacement with a new flat deck. This would retain the sandstone effect of the original bridge through applied facing (Plate 2) but lose the basket arch feature of the existing bridge.

- 5.1.9 The second, was a full replacement of the bridge with an arch feature composite deck.
- 5.1.10 Whilst this option would retain the sandstone effect of the structure, it was not considered that this was acceptable given the historic significance of the designated structures. Instead, it was considered necessary to replace the superstructure with a modern feature bridge. This recognises the historic importance of the Transpennine route and the architectural importance of the individual structures, particularly those designed by Walker and Burges.
- 5.1.11 A process of design iteration was undertaken to refine the replacement structure, focussing on the provision of an arch to emulate the historic character of the railway. Two options were considered; one that retained the flat deck but incorporated an arch above the deck (Plate 3), and a second which recreated the basket arch, but utilised an applied weathered steel structure which could achieve a wider span (Plate 4). The options were discussed with Historic England and Leeds City Council. It was agreed that the second option represented the most sympathetic in terms of heritage significance.



Plate 1 - Standard bridge reconstruction with stone cladding to parapets



Plate 3 - Bespoke feature arch



Plate 4 - Weathered steel arch

### **Assessment of Harm and Planning Balance**

- 5.1.12 Ridge Road bridge (HUL4/14) will be demolished as part of the Order Scheme. In accordance with the NPPF (paragraph 200) this loss should be considered exceptional and requires clear and convincing justification. The removal of a listed structure constitutes total loss of significance and thus substantial harm to a designated asset in terms of the NPPF. In accordance with the NPPF (paragraph 201), this harm should be weighed against substantial public benefits and should be permitted only in exceptional circumstances and with the strongest justification in accordance with Policy N14 of the Leeds Core Strategy.
- 5.1.13 This harm cannot be reduced through mitigation; however compensation for the loss of the bridge has been incorporated through the design of the new structure. This design has evolved through a collaborative process involving designers, engineers and heritage professionals including Historic England and Leeds City Council. The aim of the new design is to replicate the key architectural interest of the structures through the use of a basket arch, while creating an obviously modern feature. Historic fabric will also be incorporated to restore this historic aesthetic along the highway, particularly from deck level. Therefore, when viewed from the highway, the bridge will continue to be read as an historic feature
- 5.1.14 The new bridge uses good design principles, as advocated by the NPPF (section 12), which fit in with the overall form and layout of its surroundings by harnessing the original form of the arch. The same design will be used for the two replacement structures (Ridge Road and Austhorpe Lane) to create a unifying aesthetic.
- 5.1.15 In accordance with Local Plan policy, it is considered that the exceptional circumstances required under Policy N14 do apply and that consent for demolition is justified by the public benefits provided by the Scheme (outlined in section 4.3) and in ensuring the continued viable use of the railway. In addition, it is considered that Policy

N13 has also been satisfied and that the new design of the bridges is of high quality and has due regard to the character and appearance of their surrounding.

#### *HUL4/15 Brady Farm Bridge*

### **Significance**

- 5.1.16 Brady Farm Overbridge (HUL4/15) forms part of the original Leeds to Selby railway built between 1832-4. It was designed by Walker and Burges' and uses their distinctive single span 'basket' arch.



Plate 4 – Brady Farm Bridge

- 5.1.17 As with Ridge Road, Brady Farm Overbridge has historic interest as part of the original Leeds to Selby Railway. The bridge is of interest due to the level of craftsmanship and materials used, with attention to detail in ashlar voussoirs and notably its pronounced tooling and curved piers to its parapet, although damage has been done to these as a result of the installation of modern railings.

### **Optioneering**

- 5.1.18 In its current format, Brady Farm bridge cannot accommodate the OLE due to height restrictions. The Options which were considered to enable the installation of OLE in this location are detailed in the Alternative Options Evaluation Study for Brady Farm bridge (**CD 1.18.19**) and the evidence of Mr Harrison.
- 5.1.19 Two options were considered for lifting the arch, both resulting in changes to the physical fabric.
- 5.1.20 Bridge jacking involves lifting the bridge superstructure intact by cutting the arch free from its abutments and wing walls. The superstructure is then replaced on abutments which have been raised using infill material. The option of bridge jacking was ruled out

due to the uncertainties in the process and the risk to both the live railway and highway above. Bridge jacking has never been tested on a live railway or on a masonry bridge. It would involve significant intervention into the historic fabric of the bridge and any critical failure could lead to loss of historic fabric and prolonged closure of the railway.

- 5.1.21 Bridge jacking was therefore ruled out of consideration as an option. Given the difficulties in raising the height of the existing arch and the ruling out of track alteration (as noted above), there is no feasible option for retaining the bridge.
- 5.1.22 Once the necessity for the loss of the historic significance had been established, consideration was given to the replacement of the bridge. Brady Farm no longer functions as an active crossing over the railway and it was considered that there is no functional need to provide a crossing at this location. The bridge will, therefore, not be replaced.
- 5.1.23 The loss of the bridge and the substantial harm caused cannot be mitigated; however, the loss of the bridge will be offset by the re-use of the stone elsewhere within the scheme, including at Ridge Road and Austhorpe Lane.

#### **Assessment of Harm and Planning Balance**

- 5.1.24 Brady Farm bridge (HUL4/15) will be demolished as part of the Order Scheme. In accordance with the NPPF (paragraph 200) this loss should be considered exceptional and requires clear and convincing justification. The removal of a listed structure constitutes total loss of significance and thus substantial harm to a designated asset in terms of the NPPF. In accordance with the NPPF (paragraph 201), this harm should be weighed against substantial public benefits and should be permitted only in exceptional circumstances and with the strongest justification in accordance with Policy N14 of the Leeds Core Strategy.
- 5.1.25 The harm caused to Brady Farm bridge cannot be reduced through mitigation. However, the reclaimed stone can be used elsewhere on the route in connection with other historic structure.
- 5.1.26 In accordance with Local Plan policy, it is considered that the exceptional circumstances required under Policy N14 do apply and that consent for demolition is justified by the public benefits provided by the Scheme (outlined in section 4.3) and in ensuring the continued viable use of the railway. In addition, it is considered that Policy N13 has also been satisfied and that the new design of the bridges is of high quality and has due regard to the character and appearance of their surroundings.
- 5.1.27 For more detail on significance, optioneering and assessment on harm and planning balance, please see the Heritage Assessment Reports (**CD 1.18.01**), Section 9 of the TransPennine Route Upgrade Route-wide Statement of Significance (**CD 1.18.02**) and Section 4 of the NTP-E Statement of Significance: East of Leeds (**CD 1.18.02**).

#### *HUL4/20 Crawshaw Woods Bridge*

## Significance

5.1.28 Crawshaw Woods bridge, HUL4/20 (designated as Crawshaw Woods (Shippen House Farm) bridge) was designed by Walker and Burges as one of the two cast-iron bridges built over the Leeds and Selby railway 1830-34. The bridge comprises a segmental cast-iron single arch with a 50 ft span with pierced balustrade, made by Stanningley Ironworks in Leeds. The deck itself is an addition of the 1940s, subsequently renewed in the 1970s and strengthened in 2006. The deck is raised above the original on longitudinal girders and is structurally independent, rendering the cast iron structure non-load bearing.



Plate 5 – Crawshaw Woods Bridge

5.1.29 The bridge is of particular historic interest as the earliest cast-iron bridge still in-situ over an operational railway in the world. This gives the structure elevated significance over and above its Grade II listed status. Additional historic interest is provided by its later association with Barnbow National Filling Factory, now a scheduled monument, having provided access for many of its workers.

5.1.30 Architecturally the bridge is of interest due to the use of cast iron rather than the stonework used elsewhere. It is also architecturally interesting in its construction with the incorporation of aesthetic elements into what is essentially a utilitarian structure.

## Optioneering

5.1.31 In its current format, Crawshaw Woods bridge cannot accommodate the OLE due to height restrictions. The Options which were considered to enable the installation of OLE in this location are detailed in the Alternative Options Evaluation Study for Crawshaw Woods bridge (**CD 1.18.28**) and the evidence of Mr Harrison (**CD 7.05**).

5.1.32 Two options for structural intervention were considered at Crawshaw Woods bridge. The first involved the replacement of the cast iron superstructure and replacement with a flat concrete deck. With this option all cast iron elements would be removed

alongside the stone abutments and wing walls. The second option considered the lifting of the cast iron and reconstruction on raised parapets.

5.1.33 The preferred option was the lifting of the arch, thus retaining the historic, architectural and aesthetic significance of the bridge.

5.1.34 The cast iron structure would be dismantled piece by piece, to be reconstructed 1.4m higher than present. The additional height will be achieved by adding additional stone courses to the existing abutments. The wing walls would also be removed and reconstructed at a higher level. The modern sheet steel parapets will be removed and replaced with something more sympathetic. A new deck would be installed above the non-structural cast iron arches, to provide the public right of way and private vehicle access over the railway.



Plate 6 - Reinstated cast iron arch

### **Assessment of Harm and Planning Balance**

5.1.35 Crawshaw Woods Bridge (HUL4/20) will be retained under the Order Scheme but will be subject to alteration. The heightening of the abutments and the reconstruction of the deck will involve permanent physical changes to the structure; however, the retention and restoration of the bridge will result in the retention of the key historic element of the structure. The use of re-used stone in the abutments will result in little alteration to the aesthetic of the structure and the key feature of the cast iron arch. In addition, the opportunity to restore the ironwork is considered to be beneficial to its heritage significance, alongside the removal of the unsympathetic sheet steel parapets. The new parapets will be higher as a result of increased safety needs associated with electrification; however, the design will be more appropriate and reflect the historic arrangement.

5.1.36 Taking this into consideration, it is concluded that there will be less than substantial harm to the heritage asset. The retention of the key historic elements of the bridge and the sympathetic approach to the new works have kept the harm to a minimum, therefore it is considered that the harm lies at the lower level of the scale and the benefits associated with the overall upgrade should be weighed appropriately.

- 5.1.37 The less than substantial harm caused to the designated asset of Crawshaw Woods Overbridge needs to be assessed in line with the test presented in the NPPF (paragraph 202). Thus, the harm needs to be weighed against the public benefits delivered by the Scheme (outlined in section 4.3) and in ensuring the continued viable use of the railway. This was addressed in the proof of Mr Rivero (**CD 7.14**).

#### *HUL4/21 Austhorpe Lane Bridge*

#### **Significance**

- 5.1.38 Austhorpe Lane bridge (HUL4/21) forms part of the original Leeds to Selby railway built between 1832-4. It was designed by Walker and Burges' and uses their distinctive single span 'basket' arch to carry Austhorpe Lane, over the railway. There is a separate concrete footbridge added in the late 20th century to the west and a high level High Pressure gas main pipe bridge to the east.



Plate 7 – Austhorpe Lane Bridge

- 5.1.39 The bridge survives largely unaltered; but it is obscured to the west by the unsympathetic concrete footbridge.
- 5.1.40 Architecturally the bridge is also of interest due to the level of craftsmanship and materials used, with attention to detail in ashlar voussoirs and notably its pronounced tooling and curved piers to its parapet. The appreciation of the bridge is now somewhat eroded by the modern crash barriers at deck level, along with the addition of the footbridge which obscures the arch from the railway itself.

#### **Optioneering**

- 5.1.41 In its current format, Austhorpe Lane bridge cannot accommodate the OLE due to height restrictions. The Options which were considered to enable the installation of OLE in this location are detailed in the Alternative Options Evaluation Study for Austhorpe Lane bridge (**CD 1.18.12**) and the evidence of Mr Harrison (**CD 7.05**).

- 5.1.42 Two options were considered for lifting the arch, both resulting in changes to the physical fabric.
- 5.1.43 Bridge jacking was considered but was discounted due to the impacts for the carriageway together with construction risks and lack of track access necessary to carry out the works.
- 5.1.44 Once the necessity for the loss of the historic significance had been established, consideration was given to the replacement of the bridge. As the structure carries a main highway over the railway, the need for a replacement was confirmed. Options were then put forward for reconstruction.
- 5.1.45 One option featured a standard flat concrete deck replacement. This would involve removal of the existing arch superstructure and replacement with a new flat deck. This would retain the sandstone effect of the original bridge through applied facing but lose the basket arch feature of the existing bridge.
- 5.1.46 Whilst this option would retain the sandstone effect of the structure, it was not considered that this was acceptable given the historic significance of the designated structures. Instead, it was considered necessary to replace the superstructure with a modern feature bridge. This recognises the historic importance of the Transpennine route and the architectural importance of the individual structures, particularly those designed by Walker and Burges.
- 5.1.47 A process of design iteration was undertaken to refine the replacement structure, focussing on the provision of an arch to emulate the historic character of the railway. Two options were considered; one that retained the flat deck, but incorporated an arch above the deck, and a second which recreated the basket arch, but utilised an applied weathered steel structure which could achieve a wider span. The options were discussed with Historic England and Leeds City Council. It was agreed that the second option represented the most sympathetic in terms of heritage significance.



Plate 8 – Composite flat deck



Plate 9 - Bespoke feature arch



Plate 10 - Weathered steel arch

### **Assessment of Harm and Planning Balance**

5.1.48 Austhorpe Lane bridge (HUL4/21) will be demolished as part of the Order Scheme. In accordance with the NPPF (paragraph 200) this loss should be considered exceptional and requires clear and convincing justification. The removal of a listed structure constitutes total loss of significance and thus substantial harm to a designated asset in terms of the NPPF. In accordance with the NPPF (paragraph 201), this harm should be weighed against substantial public benefits and should be permitted only in exceptional circumstances and with the strongest justification in accordance with Policy N14 of the Leeds Core Strategy.

5.1.49 This harm cannot be reduced through mitigation; however compensation for the loss of the bridge has been incorporated through the design of the new structure. This design has evolved through a collaborative process involving designers, engineers and heritage professionals including Historic England and Leeds City Council. The aim of the new design is to replicate the key architectural interest of the structures through

the use of a basket arch, while creating an obviously modern feature. Historic fabric will also be incorporated to restore this historic aesthetic along the highway, particularly from deck level. Therefore, when viewed from the highway, the bridge will continue to be read as an historic feature.

5.1.50 The new bridge uses good design principles, as advocated by the NPPF (section 12), which fit in with the overall form and layout of its surroundings by harnessing the original form of the arch. The same design will be used for the two replacement structures (Ridge Road and Austhorpe Lane) to create a unifying aesthetic.

5.1.51 In accordance with Local Plan policy, it is considered that the exceptional circumstances required under Policy N14 do apply and that consent for demolition is justified by the public benefits provided by the Scheme (outlined in section 4.3) and in ensuring the continued viable use of the railway. In addition, it is considered that Policy N13 has also been satisfied and that the new design of the bridges is of high quality and has due regard to the character and appearance of their surroundings.

## 5.2 Other Heritage Assets for consideration

### *The Historic Railway*

#### **Statement of Significance**

5.2.1 The Transpennine route between Leeds and Micklefield forms part of the historic Leeds and Selby railway, opened in 1834. The significance of the railway has been established through a number of studies produced by Alan Baxter Associates into the heritage significance of the Transpennine Route and its component historic infrastructure, including the Transpennine Route Upgrade Route-Wide Statement of Significance and the East of Leeds Statement of Significance<sup>4</sup>. The scope of these was agreed with Historic England and has been used to inform the designation of structures along the route. A total of eight structures within the Scheme route were designated as part of this process.

5.2.2 The line was constructed with a total of 43 bridges and 16 level crossings. Originally it was proposed to construct twin arch bridges to accommodate four lines, but instead the distinctive single span 'basket' arch was employed. There were also two iron bridges along the route, of which only HUL4/20 Crawshaw Woods bridge survives on the railway.

5.2.3 The railway was opened to the public on the 22nd September 1834. By 1869 the line had been lengthened from Marsh Lane to Leeds centre and from Micklefield to Church Fenton under North Eastern Railway.

5.2.4 The Act of Parliament for the Leeds and Selby Railway was authorised in 1830, four months before the opening of the Liverpool and Manchester Railway, the world's first inter-urban railway. This raises its historic significance, forming part of the Pioneering Age of the railway (1825-41) before the flurry of railway activities of the 1840s and 50s. Also raising its significance are the number of surviving historic structures, the most

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<sup>4</sup> Alan Baxter and Associates Ltd. 2019. Transpennine Route Upgrade: Route-wide Statement of Significance and Alan Baxter and Associates Ltd. 2014. NTP-E Statement of History and Significance: East of Leeds

complete of which have been designated as listed buildings. The reasons for listing mainly focused on the uniform and unusual design attributed to James Walker and William Burges. These have group value, designed to the same design aesthetic and materials. Other railway structures were designated due to their individuality in design and construction but forming part of the cohesive railway and contributing to the group value.

### **Optioneering**

- 5.2.5 Once the need to address capacity issues on key East to West connections across the north was established, a high level review of options was undertaken in order to deliver the objectives of the Scheme. This included consideration of other modes of transport infrastructure, including the motorway network, alongside other rail schemes. Non-infrastructure alternatives were also considered including new rolling stock; however, challenges remained around performance, reliability, and capacity for both local and express services, which can only be resolved through infrastructure investment.
- 5.2.6 Due to a lack of feasible strategic options, it was deemed that improvements to the existing North Transpennine Route were the only option available. Once the need for the Scheme was established, options were considered for limiting impacts to the historic railway.
- 5.2.7 The historic construction of the railway poses a number of issues for upgrading. In particular the height restrictions posed by the bridge design could not accommodate the necessary OLE. Each bridge was individually risk assessed to establish where clearance could be achieved. In instances where Network Rail minimum standards could not be achieved, options for derogations were assessed.

### **Assessment of Harm and Planning Balance**

- 5.2.8 The railway will be altered as a result of the Scheduled Works. The installation of OLE will alter the appearance of the railway; however, it is considered that this constitutes part of the continuing evolution of the railway to ensure that it remains in active use.
- 5.2.9 A total of four bridges will be substantively altered by the Scheduled Works. This includes the total loss of three original bridges and the alteration of a fourth. The bridges to be removed form part of Walker's original basket arch design and three of those designated as good examples of the structure type. As such, harm will be caused to the historic railway through the loss of three structures.
- 5.2.10 As a non-designated heritage asset the harm caused to the historic railway should be assessed against paragraph 203 of the NPPF, whereby a balanced judgement is required *having regard to the scale of any harm or loss and the significance of the heritage asset*. The early date of the railway and incorporation of designated assets raises its significance; however, the scale of the harm is considered to be low and outweighed by the benefits of securing its future use.
- 5.2.11 It should be considered in weighing these benefits that the Scheme will enable the historic railway to continue in viable use, and in the use it was intended for. The purpose of the Scheme is to revitalise that railway; to make it fit for operation in and

through the 21st century; and to serve the needs of the local and regional economy. By incorporating the Scheme into the existing railway it will continue the evolution of historic route, adding to the next phase of its development and conserving it for future use. This should be considered an important public benefit.

#### *Leeds City Centre Conservation Area*

- 5.2.12 The railway line traverses a section of the Leeds City Centre Conservation Area. There are a high number of designated assets within the conservation area, including the Corn Exchange, White Cloth Hall, City Markets and Parish Church of St Peter (also referred to as Leeds Minster). The railway runs through the southern extent of the designated area with the viaduct forming a defining feature in the streetscape. The arches create tunnel views through the structure with the buildings on each side having their own character. Due to the height of the viaduct, the railway itself does not contribute significantly to the character of the area; however the viaduct and arches upon which it sits are a key element.
- 5.2.13 The Scheme runs into the conservation area at its eastern end, following the existing railway until it reaches Leeds Station. Works to this part of the railway are primarily limited to replacement of existing infrastructure, in recognition that this section of the railway was electrified in the late 20<sup>th</sup> century.
- 5.2.14 In terms of the works falling within the Order Scheme and/or request for deemed planning permission, these are limited to the installation of small-scale electrification and signalling equipment on metal staging structures within Penny Pocket Park. More details on the development proposed and the operational railway limitations that prevent the location of the replacement signal gantry in any other location are provided in the Design and Access Statement (**CD 1.15**). Specifically, the location of signalling assets is determined by signalling design standards. The design standards specify required distances between trail cable connection limits to signalling equipment. Alternative locations of signalling assets would therefore not be feasible as the distances between assets would be too long for equipment to function correctly.
- 5.2.15 Effects on the conservation area are limited to changes in views of key heritage assets, including the Leeds Minster. During consultation with Leeds City Council Conservation Team, concerns were raised regarding potential impacts on views of the Minster from Kirkgate, specially from south of the railway where proposed replacement infrastructure will also be seen within the wider view. While it is acknowledged that there will be a change in the view of the Minster from Kirkgate this will involve the introduction of a new vertical element into the view as part of existing infrastructure. It is not considered that this will detract from the appreciate or prominence of the Minster which remains a dominant feature within the view, nor will it decrease the ability to understand and appreciate its historic interest. Whilst acknowledging a change, no harm is caused to heritage significance of the Minster or the Leeds City Conservation Area.

## **6 Approach to Mitigation, Compensation and Conditions**

- 6.1 The proposals for Ridge Road (HUL4/14), Brady Farm (HU4/15) and Austhorpe Lane (HUL4/21) have been formulated as part of an iterative design process including engineering alternatives and design development.
- 6.2 Embedded mitigation includes the following specific design measures:
- (a) The adoption of a bespoke new feature structure which take cues from the key historic characteristic of the listed structures (for Ridge Road and Austhorpe Lane);
  - (b) The adoption of a single design to create a cohesive aesthetic along the railway;
  - (c) The incorporation of stonework from the removed bridge to maintain the aesthetic of the retained historic elements, including the abutments and the parapets; and
  - (d) Repair works to be carried out to retained historic elements to secure future stability.
- 6.3 A Conservation Implementation Management Plan (CIMP) to further define the works to be undertaken at Crawshaw Woods bridge (HUL4/20) will be prepared. The document will set out the methodology for demolition and construction of structures, as required, and will also set out any measures for improving and/ or enhancing the setting and sustainability of the bridge. This will include maintenance schedules to secure the long term condition of the bridge.
- 6.4 In addition to the embedded mitigation, compensation will also be secured through the archaeological recording of heritage assets affected, in agreement with the historic environment stakeholders. This would take the form of compensation for the harm caused by demolition or alteration, not mitigation. The level of recording will be consistent with the levels outlined in Historic England guidance.

## **7 Consultation**

- 7.1 Consultation has been undertaken with both Historic England and Leeds City Council throughout the Scheme, commencing in August 2018. Regular meetings have been held to discuss the Scheduled Works and evolving options for the listed structures.
- 7.2 Both parties have been involved in the design and optioneering process. The design development has been presented to the heritage stakeholders at a series of meetings. These included briefings on the objectives of the Scheme, the requirement for intrusive works and to work collaboratively on design proposals.
- 7.3 During statutory consultation on the Scheme responses were received from Historic England and Leeds City Council. The response from Leeds City Council focussed on the deemed harm to heritage assets, noting that the loss of the listed structures was deemed to represent substantial harm. This is consistent with Network Rail's assessment, noting that at the time of statutory consultation, the feasibility of retaining Crawshaw Woods bridge was still unknown. No objection was made to the demolition or to the design of the replacement structures.
- 7.4 In their response Historic England noted agreement in principle for the total loss of Brady Farm bridge (HUL4/15). In mitigation it was requested that material from Brady Farm bridge be re-used elsewhere within the scheme. This has been incorporated into the final plans and is outlined in the Listed Building Consent applications.
- 7.5 The hybrid approach to the design of a replacement structure for Ridge Road (HUL4/14) was welcomed by Historic England. Further detail was requested for the proposals at Austhorpe Lane bridge (HUL4/21) and Crawshaw Woods bridge (HUL4/20) as these bridges were in the design process. These details were subsequently presented to, and agreed with, Historic England as part of continued engagement and are included in the Listed Building Consent applications.
- 7.6 A response was also received from the Georgian Society who raised concerns regarding the loss of four designated structures associated with the historic railway. They further stated that there should be strong justification for the substantial harm caused. They also raised concerns that the replacement bridges did not replicate the masonry of the original structures. These concerns were responded to outlining the need for the loss of the bridges and acknowledgement of the substantial harm caused. It was stressed that the Scheme was working closely with Historic England to come to an acceptable solution. The Georgian Society have since responded to the applications for listed building consent stating that they do not object to any of the applications.
- 7.7 Information on the Scheme was also sent to the Railway Heritage Trust, but no response was received.
- 7.8 As a result of the continued engagement, no objection to the Listed Building Consent applications has been received from Historic England, Leeds City Council or the Georgian Society.

## **8 Objections and Representations**

### **8.1 Objection The Victorian Society**

#### *Objection*

- 8.1.1 Objection to the proposed demolition of Ridge Road Overbridge, Brady Farm Overbridge and Austhorpe Lane Overbridge.
- 8.1.2 The Victorian Society believe that there exists a potential for a more balanced compromise that can deliver substantial public benefits while preserving the Grade II listed bridges. The Society does not consider that the options for delivering the Scheme in a way that would retain the structures has been fully explored. In particular it is noted that Track Slue/ Track Lower should be subject to further consideration and should not be dismissed on a financial basis.

#### *Response*

- 8.1.3 The decision to demolish the Grade II listed bridges is the result of an extensive optioneering process. This optioneering has considered all viable options and does not rely on the financial requirements of the Scheme. With specific reference to the track slue/ lower option, significant engineering constraints make this option unfeasible.
- 8.1.4 The historic interest of the bridge and the railway context has been taken into consideration in the design of replacement structures. Network Rail has worked closely with Historic England and the conservation team at Leeds City Council (LCC) in developing the Scheme.
- 8.1.5 Listed Building Consent applications have been submitted for the works. This includes information on the significance of the structure and the options considered in order to for a balanced planning judgement to be made.
- 8.1.6 Network Rail acknowledges that substantial harm will be caused to the listed structures through their demolition and that paragraphs 200 and 201 of the NPPF (now paragraphs 206 and 207) apply.

### **8.2 Objection 07 Leeds City Council**

#### *Objection*

- 8.2.1 **Paragraph 71** - Mitigation has been agreed with Network Rail for the substantial harm caused by the demolition of the listed buildings as part of the proposed Scheme.

#### *Response*

- 8.2.2 Network Rail welcomes the acknowledgement that mitigation for the works to listed bridges is acceptable. I repeat that whilst it is Network Rail's assessment that substantial harm will be caused due to the total loss of Ridge Road (HUL4/14), Brady Farm (HUL4/15) and Austhorpe Lane (HUL4/21), less than substantial harm will be caused by the partial dismantling and reconstruction of Crawshaw Woods bridge (HUL4/20).

*Objection*

- 8.2.3 **Paragraphs 72-75** - Further assessment is requested regarding the Kirkgate/Marsh Lane works, including the installation of signalling gantry in the vicinity of the Grade I listed Leeds Minster.
- 8.2.4 Paragraph 199 of the National Planning Policy Framework (NPPF) states that "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."
- 8.2.5 In addition, paragraph 202 states, "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."
- 8.2.6 The Council's view is that the impacts on the Minster as a result of the installation of the signalling gantry would cause less than substantial harm. This harm is not such that can be mitigated against but the Council would like to draw this to the Inspector's attention in the consideration of the Application.

*Response*

- 8.2.7 The proposed infrastructure is a replacement of existing overhead line equipment. The development proposed and the operational railway limitations that prevent the location of the replacement signal gantry in any other location is provided in the Design and Access Statement (**CD 1.15**). The Planning Statement (**CD 1.13**) contains its own assessment of the level of adverse impact on the setting of listed buildings.
- 8.2.8 It is acknowledged that there will be a change in the view from the location specified. This will involve the introduction of a new vertical element into the view as part of existing infrastructure. However, it is not agreed that this will detract from the tower of the Minster which is a dominant feature within the view, or decrease the ability to understand and appreciate its historic interest. Whilst acknowledging a change, it is not considered that any harm is caused to heritage significance.

**8.3 Objection 08 Brian Hall**

*Objection*

- 8.3.1 Objection to the demolition in principle of the grade II listed bridge on Austhorpe Lane Leeds.

*Response*

- 8.3.2 The decision to demolish the Grade II bridge [HUL4/21] is the result of an extensive optioneering process. The demolition is accepted as resulting in substantial harm which needs to be weighed against the public benefits delivered by the Scheme.

- 8.3.3 The historic interest of the bridge and the railway context has been taken into consideration in the design of the replacement structure. Network Rail has worked closely with Historic England and the conservation team at Leeds City Council (LCC) in developing the Scheme.

#### **8.4 Objection 09 Christopher Makin**

##### *Objection*

- 8.4.1 Objection to the demolition of Brady Farm Bridge which is a Grade II listed structure. The permanent removal of it will be of detriment to the heritage of this area.

##### *Response*

- 8.4.2 The decision to demolish the Grade II listed Brady Farm [HUL4/15] bridge is the result of an extensive optioneering process. The demolition is accepted as being substantial harm, and this harm will be weighed against the public benefits delivered by the Scheme.
- 8.4.3 The bridge in its current form cannot accommodate the clearance required for new overhead line equipment, which is needed to deliver the Scheme. Network Rail has concluded that the demolition of the bridge can provide benefits elsewhere through the re-use of the stonework.
- 8.4.4 The Listed Building Consent application includes information on the significance of the structure and the options considered in order to for a balanced planning judgement to be made.
- 8.4.5 Mitigation will be put in place to secure the archaeological recording of the structure prior to works commencing.

#### **8.5 Objection 12 E Todd**

##### *Objection*

- 8.5.1 Objection to the demolition of Ridge Road bridge [HUL4/14] and it being rebuilt in a new design while using the original stone. The objection noted that the bridge is listed and should be protected or maintained and reconstructed in the original design.

##### *Response*

- 8.5.2 The decision to demolish the Grade II Ridge Road bridge [HUL4/14] is the result of an extensive optioneering process. The demolition is accepted as being substantial harm and this harm will be weighed against the public benefits delivered by the Scheme.
- 8.5.3 The design of the new bridge has been carefully considered and the final structure is a result of extensive consultation with Historic England and the conservation team at Leeds City Council (LCC). Rebuilding in the original stone has been considered, but is not feasible within the limitations of the working railway and taking into consideration safety constraints. The new design takes into consideration the historic significance of the original structure and the railway context.

- 8.5.4 Mitigation will be put in place to secure the archaeological recording of the structure prior to works commencing and material of historic interest removed from the structure will be reused elsewhere within the Scheme.

## **8.6 Objection 13 Micklefield Parish council**

### *Representation*

- 8.6.1 Micklefield Parish Council objects to the complete demolition of a grade II listed railway overbridge, acknowledging that it is rare and unique as there are few other examples.

### *Response*

- 8.6.2 The decision to demolish Ridge Road Bridge (HUL4/14) is the result of an extensive optioneering process involving Historic England and the conservation team at Leeds City Council. This considered both track lower and raising of the existing structure. Demolition is accepted as the only viable option and is acknowledged to be substantial harm and this harm will be weighed against the public benefits delivered by the Scheme.
- 8.6.3 The bridge will be replaced with a new structure which takes into consideration in the historic significance of the bridge within its design.
- 8.6.4 The Listed Building Consent application includes information on the significance of the structure and the options considered in order to for a balanced planning judgement to be made.

## **8.7 Objection 14 Anonymous**

### *Objection*

- 8.7.1 Objection to the demolition of Brady Farm Overbridge (HUL4/15) which should remain as part of the history of Garforth.

### *Response*

- 8.7.2 The decision to demolish Brady Farm Overbridge (HUL4/15) is the result of an extensive optioneering process involving Historic England and the conservation team at Leeds City Council. Demolition is accepted as the only viable option and is acknowledged to be substantial harm and this harm will be weighed against the public benefits delivered by the Scheme. There is no proposal to replace the bridge.

## **8.8 Objection 15 Anonymous**

### *Objection*

- 8.8.1 Objection to the demolition of Austhorpe Lane Overbridge (HUL4/21) with a request that the new bridge should retain the look and style of the historic structure.

### *Response*

- 8.8.2 The design of the new bridge has been carefully considered and the final structure is a result of extensive consultation with Historic England and the conservation team at

Leeds City Council (LCC). Rebuilding in the original stone has been considered but is not feasible within the limitations of the working railway and taking into consideration safety constraints. The new design takes into consideration the historic significance of the original structure and the railway context.

## **8.9 Objection 16 Anonymous**

### *Objection*

- 8.9.1 Objection to the demolition of Brady Farm Lane Overbridge (HUL4/15) as a listed building. Concern expressed regarding what will happen to the material lost.

### *Response*

- 8.9.2 The decision to demolish Brady Farm Overbridge (HUL4/15) is the result of an extensive optioneering process involving Historic England and the conservation team at Leeds City Council. Demolition is accepted as the only viable option and is acknowledged to be substantial harm and this harm will be weighed against the public benefits delivered by the Scheme.
- 8.9.3 The stonework from the bridge will be used elsewhere within the Scheme where feasible.

## **8.10 Objection 17 Anonymous**

### *Objection*

- 8.10.1 Objection to the demolition of Brady Farm Lane Overbridge (HUL4/15) identifying the historic importance of the structure and objection to a new structure.

### *Response*

- 8.10.2 Extensive work has been undertaken in establishing the historic and architectural significance of Brady Farm Overbridge. The design of the new bridge has been carefully considered and the final structure is a result of extensive consultation with Historic England and the conservation team at Leeds City Council (LCC). The new design takes into consideration the historic significance of the original structure and the railway context.

## **8.11 Objection 18 Anonymous**

### *Objection*

- 8.11.1 Objection to the demolition of Brady Farm Lane Overbridge (HUL4/15) as a piece of industrial heritage.

### *Response*

- 8.11.2 The decision to demolish Brady Farm Overbridge (HUL4/15) is the result of an extensive optioneering process involving Historic England and the conservation team at Leeds City Council. This included consideration of rebuilding the original bridge. Demolition is accepted as the only viable option and is acknowledged to be substantial

harm and this harm will be weighed against the public benefits delivered by the Scheme.

#### **8.12 Objection 19 Anonymous**

##### *Objection*

8.12.1 Objection to the demolition of Ridge Road Overbridge (HUL4/14) as a listed building. Concern expressed regarding what will happen to the material lost.

##### *Response*

8.12.2 The decision to demolish Ridge Road Overbridge (HUL4/14) is the result of an extensive optioneering process involving Historic England and the conservation team at Leeds City Council. Demolition is accepted as the only viable option and is acknowledged to be substantial harm and this harm will be weighed against the public benefits delivered by the Scheme.

8.12.3 The bridge will be rebuilt in a design that has been accepted by Historic England and Leeds City Council. As part of this, stone from the original bridge will be reused.

#### **8.13 Objection 20 Anonymous**

##### *Objection*

8.13.1 Objection to the demolition of Ridge Road Overbridge (HUL4/14) as one of the few historic structures in the area.

##### *Response*

8.13.2 The decision to demolish Ridge Road Overbridge (HUL4/14) is the result of an extensive optioneering process involving Historic England and the conservation team at Leeds City Council. Demolition is accepted as the only viable option and is acknowledged to be substantial harm and this harm will be weighed against the public benefits delivered by the Scheme.

#### **8.14 Support 01 North Yorkshire Council**

##### *Support*

8.14.1 North Yorkshire Council does not object to the Scheme; however, it has commented with regard to the Scheduled Monument adjacent to the proposed Highroyds Wood public Right of Way diversion. Note it is unlikely to be impacted, but suggest Network Rail checks with Historic England as to whether Scheduled Monument Consent will be required. The Council requests detail of the full scope of the works at the underpass which is a Grade II Listed Building so it can consider whether Listed Building Consent is required separate to the Transports & Works Order.

##### *Response*

8.14.2 Network Rail has undertaken consultation with Historic England regarding the needs for Scheduled Monument Consent for the diversion of the public Right of Way. Historic England has confirmed that consent is not required.

8.14.3 The works will not require any physical alteration to the listed underpass (Newthorpe Cattle Creep Bridge, HUL3/11); therefore no Listed Building Consent application has been submitted.

#### **8.15 Support 02 Georgian Society**

##### *Support*

8.15.1 Comments have been submitted by The Georgian Society in response to the Listed Building Consent applications for Ridge Road Overbridge (HUL4/14), Brady Farm Overbridge (HUL4/15) and Austhorpe Lane Overbridge (HUL4/21).

8.15.2 The society acknowledges the argument put forward as to why demolition is necessary and does not object to the applications. It further reminds the local authority that they should be satisfied that all viable ways of achieving the same results have been explored before granting consent.

##### *Response*

8.15.3 Network Rail acknowledges the response from the Georgian Society.

8.15.4 Network Rail has worked closely with Historic England and the conservation team at Leeds City Council (LCC) in developing the Scheme. This includes an extensive programme of optioneering to find viable alternatives; however, it has been concluded that demolition is the only viable option.

#### **8.16 Comment 01 Historic England**

##### *Comment*

8.16.1 Historic England have responded to the Listed Building Consent Applications for Ridge Road Overbridge (HUL4/14), Brady Farm Overbridge (HUL4/15), Crawshaw Woods Overbridge (HUL4/20) and Austhorpe Lane Overbridge (HUL4/21).

8.16.2 Historic England do not object to the consent applications and agree with the conclusions made with regard to the harm caused to the listed structures and acknowledge the work done to explore options for their retention. With regard to Crawshaw Woods Overbridge (HUL4/20) Historic England note that the refurbishment of the bridge should be considered to deliver public benefits.

8.16.3 Historic England recommend that Conditions are attached to the consent applications should they be granted. These should take the form of historic building recording and the re-use of historic fabric.

##### *Response*

8.16.5 Network Rail welcomes the comments from Historic England and acknowledges acceptance of works undertaken through the optioneering process. Network Rail also acknowledges the recommendation for condition to be attached to the consents. A list of putative conditions has been submitted with each of the applications and will be discussed further with LCC during the course of the Inquiry.

## **8.17 Comment 02 Leeds City Council**

### *Comment*

8.17.1 Leeds City Council Conservation Team have responded to the Listed Building Consent Applications for Ridge Road Overbridge (HUL4/14), Brady Farm Overbridge (HUL4/15), Crawshaw Woods Overbridge (HUL4/20) and Austhorpe Lane Overbridge (HUL4/21).

8.17.2 The comments state that the works are considered to result in substantial harm to three of the listed structures and the group value of the Leeds to Selby Railway Line. They acknowledge the information provided in the Heritage Statements accompanying the applications and highlights the requirement within the NPPF that this harm should be weighed against the public benefits of the Scheme. It further acknowledges that these public benefits have been appropriately set out in the Heritage Statement.

8.17.3 With regard to Crawshaw Woods Overbridge (HUL4/20), it is agreed that less than substantial harm is caused.

### *Response*

8.17.4 Network Rail acknowledges the comments from Leeds City Council.

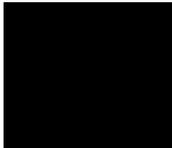
**9 Witness Declaration**

9.1 I hereby declare as follows:

9.2 This Proof of Evidence includes the facts which I regard as being relevant to the opinions which I have expressed, and the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion.

9.3 I believe the facts which I have stated in this Proof of Evidence are true and that the opinions expressed are correct.

9.4 I understand my duty to the Inquiry to help it with matters within my expertise and I have complied with that duty.



AMY JONES  
15 FEBRUARY 2024