

# MICKLEFIELD PARISH COUNCIL

Sole Trustee of Micklefield Recreation Ground Charity



Chairman ; Cllr J. A. Crossley

Vice Chairman ; Cllr N. Duff

Treasurer ; Cllr R. M. Czwarno

Clerk ; Miss J. Hebden  
6 Churchville Avenue,  
Micklefield,  
Leeds, LS25 4AS

## STATEMENT OF CASE

### **Public Inquiry into the Listed Building Consents relating to the Network Rail (Leeds to Micklefield Enhancements) Transport and Works Act Order**

#### **1.0 MICKLEFIELD PARISH COUNCIL**

- 1.1 Micklefield Parish Council is the Local Authority for the parish of Micklefield and has been in continuous existence since 1894.
- 1.2 The Parish Council has been asked by the Planning Inspectorate to consider submitting a Statement of Case specific to our objection to the demolition and replacement of the Grade II Listed A656 Ridge Road Bridge, in order to present oral evidence at the Public Inquiry into the Listed Building Consents (LBC) relating to the Network Rail (Leeds to Micklefield Enhancements) Transport and Works Act Order (TWAQ).
- 1.3 Although submitting an objection-specific Statement of Case is not vital for the Parish Council to be able to present oral evidence during the LBC Inquiry (as it is running concurrently with the Network Rail (Leeds to Micklefield Enhancements) TWAQ Inquiry), there is some merit in the Parish Council creating a targeted document which consolidates the points we made in our Statement of Case to the TWAQ Inquiry with our objection to the Listed Building application for Ridge Road Bridge (23-04390-LI).
- 1.4 The Parish Council's objection to Listed Building application 23-04390-LI was actually submitted to Leeds City Council 4 days after our Statement of Case for the TWAQ Inquiry was submitted to the Planning Inspectorate and Network Rail. There were additional objection points in the Parish Council's objection letter which were agreed and approved after that Statement of Case had been submitted. Therefore, our Statement of Case to TWAQ Inquiry did not capture the full scope of all our objection points to the demolition and replacement of Ridge Road Bridge.
- 1.5 The Parish Council has decided to submit this Statement of Case to the LBC Inquiry, so that we do have a document which consolidates the points we made about Ridge Road Bridge in our Statement of Case to the TWAQ Inquiry with our objection to the Listed Building application for Ridge Road Bridge (23-04390-LI).

## **2.0 DEMOLITION AND REPLACEMENT OF THE GRADE II LISTED A656 RIDGE ROAD BRIDGE**

- 2.1 Micklefield Parish Council objects to the complete demolition of this Grade II Listed railway overbridge, which Network Rail itself acknowledges is rare and unique as there are few other examples.
- 2.2 The A656 Ridge Road Bridge was given Listed Building status in 2015 due to its special architectural and historical state at a national level (i.e. as a bridge of rare design and high-level of craftsmanship located on one of the earliest railways in the world).
- 2.3 That Grade II designation was in response to Network Rail's bespoke set of bridge alteration proposals along the railway between Leeds and Micklefield, which was submitted as a consolidated planning application in 2014/15. At that stage, Network Rail was proposing to lower the track bed under Ridge Road Bridge and there would also have been some alterations to the existing arch.
- 2.4 Even though this bridge is now Grade II Listed, Network Rail has decided that the only financially viable method of resolving the clearance problems for the overhead catenary is to completely demolish Ridge Road Bridge and build a new bridge to replace it. The Parish Council accepts that it would cost more money to lift the entire bridge arch structure – considerably more money – but that does not mean that to do so is financially unviable.
- 2.5 The whole point of granting Listed Building status to the bridge is for the state to have a greater control as to what happens to it. Altering or otherwise developing listed buildings in such a way as to retain their visual integrity is almost always a more costly exercise than completely demolishing them and re-developing the site. Indeed, one of the basic tenets of listed building protection is to prevent the destruction, or gross alteration, of certain structures simply because it is less expensive to do so.
- 2.6 Jacking up the unique basket arch may well cost twice as much as demolition and replacement with a new bridge, but Micklefield Parish Council believes that is the correct thing to do. Network Rail is not saying that demolition and replacement is the only practical and physically possible way of resolving the clearance issues; merely that they do not choose to spend the money that lifting the bridge arch would require. The use of cost alone is arguably insufficient a reason for the demolition of a Grade II listed building.
- 2.7 The Parish Council would respectfully ask that the Inspector tests this particular proposal to destruction. Heritage assets are invaluable and finite resources. Every effort should be made to retain them, particularly when they hold both national and international significance. The Leeds to Selby railway and its associated structures represents a global milestone in human history, integral as they were to the industrial revolution and the creation of the world we have today. The question is very simple though: how much is it worth to retain this unique bridge, and to what extent should the state seek to ensure that Network Rail retains it?
- 2.8 In considering a decision, particular consideration must be made to paragraph 206 of the National Planning Policy Framework (NPPF) 2023, which states: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification."

- 2.9 Further, paragraph 207 of the NPPF 2023 states: “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
  - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 2.10 To grant consent Leeds City Council must not only be satisfied that the identified public benefits are deliverable, but also that there are no other viable or practical ways of delivering them which will cause a lesser degree of harm than that proposed within this application for listed building consent.
- 2.11 It is Micklefield Parish Council’s contention that the benefits of the demolition of the bridge do not outweigh the harm, for the simple reason that the bridge does not need to be demolished in order to achieve the same public benefits. Furthermore, Network Rail has not established that this is the case.
- 2.12 It is for these reasons that Micklefield Parish Council believes permission for the demolition of the listed building (Ridge Road bridge) should not be granted.

### **3.0 ADDITIONAL PROFOUND OBJECTIONS TO THE PROPOSED REPLACEMENT BRIDGE, IF PERMISSION FOR THE DEMOLITION OF RIDGE ROAD BRIDGE WAS TO BE GRANTED**

- 3.1 It is extremely disheartening to see that if Ridge Road Bridge is ultimately demolished as part of an approved TWAO, Network Rail will have missed a golden opportunity to build a replacement bridge incorporating a Public Bridleway across the railway.
- 3.2 The existing bridge incorporates a 2m wide bitmac footway on its east side. Whilst this highway footway stops dead at the north end of the bridge, the very wide adopted highway verge extends a long way to the north of the bridge.
- 3.3 It would have been physically easy to construct a replacement bridge 3m wider on its east side, thus facilitating the provision of a 5m wide Public Bridleway segregated from the carriageway of the A656 Ridge Road.
- 3.4 A bridge for horse riders at this location would have connected to the new Public Bridleway that Network Rail had themselves proposed from Lower Peckfield Lane to the A656 Ridge Road adjacent to the railway on its north side as Option A in its Scoping Exercise of 2021.
- 3.5 Network Rail had proposed that design option with a Pegasus Crossing diagonally along the full length of the bridge, but this idea failed apparently because Leeds City Council’s Highways Development Services couldn’t countenance a Public Bridleway crossing the A656 Ridge Road in that location.

- 3.6 Once Network Rail had decided that its preference was to completely demolish Ridge Road Bridge, it is extremely regrettable that Network Rail did not then make a concerted effort to see if they could design a new bridge which would link the new Public Bridleway that they wanted to provide on the north side of the railway back to Micklegate PB 8 (Pit Lane) on the south side of the railway (via the existing Public Footpath that Network Rail also wanted to upgrade to Public Bridleway which runs along the southern edge of Peckfield Business Park).
- 3.7 The only sticking point, in terms of the practical feasibility of accomplishing this was that a 3m-4m wide strip of the very large rear garden of Ridge Bridge Cottage would need to have been acquired as part of the TWAO. This might have actually been very easy – the rear garden of that property is entirely fenced and has no access directly on to the A656 Ridge Road, and the owner occupier might have been perfectly happy to sell a narrow strip of their garden in order to facilitate a wider bridge incorporating a Public Bridleway.
- 3.8 The really sad thing is that in over two years of protracted deliberations, Network Rail don't appear to have even thought to ask the owner of Ridge Bridge Cottage if they were amenable to this idea.
- 3.9 An imaginative way of creating new and valuable Public Bridleway routes either side of the railway to the west of Peckfield Level Crossing (that Network Rail had itself identified and which Micklegate Parish Council supported) could have been achieved at a marginal extra costs to the new Ridge Road Bridge, and without even having to think of constructing a very expensive massive horse bridge to the side of 1 Railway Cottages.

#### **4.0 TRAFFIC PROBLEMS THROUGH MICKLEFIELD ARISING FROM AN EXTENDED CLOSURE OF RIDGE ROAD FOR BRIDGE DEMOLITION AND RECONSTRUCTION**

- 4.1 Micklegate Parish Council cannot accept any extended closure of Ridge Road due to the demolition and reconstruction of the bridge. The prescribed diversions for through traffic away from the A656 Ridge Road will be lengthy (all the way round the southern and northern edges of Garforth) and could last for a considerable period.
- 4.2 If the required diversions are not fully and properly signposted and no proactive measures are taken to try and discourage people from driving straight through Micklegate as their own ad hoc diversions, then our village will certainly get an enormous amount of additional traffic coming through on the Great North Road and Church Lane between the Boot & Shoe Roundabout on the A63 and Junction 47 of the M1.
- 4.3 Anybody who knows the road system in this area around Garforth (or knows how to read a map) will quickly realise that the easiest way of getting to and from those two points on the road system will be through the village of Micklegate.
- 4.4 It is important that the Public Inquiry tests both the signage proposals and additional measures that will limit inappropriate ad hoc diversions through Micklegate, regardless of what happens with the A656 Ridge Road Bridge.

Cllr Jon A Crossley  
Chairman  
Micklegate Parish Council

19<sup>th</sup> February 2024