

LGHAG

Rule 6 Statement of Case by Leeds Girls' High School Action Group

Appeals by Morley House Trust in respect of non-determination of planning, conservation area and listed building applications for
Leeds Girls' High School site
Headingley Lane, Leeds

APP/N4720/E/10/2140587
APP/N4720/A/10/2140564,
APP/N4720/A/10/2140572,
APP/N4720/A/10/2140578 and
APP/N4720/E/10/2140575

Leeds Girls High School Action Group**STATEMENT OF CASE****1.0 Introduction**

1.1. Reference is made to appeals:

APP/N4720/E/10/2140587
APP/N4720/A/10/2140564,
APP/N4720/A/10/2140572,
APP/N4720/A/10/2140578 and
APP/N4720/E/10/2140575

for non-determination by Leeds City Council of planning, conservation area and listed building applications submitted by the Morley House Trust for development of the former Leeds Girls High School site on Headingley Lane.

1.2. This Statement of Case has been prepared by the Leeds Girls High School Action Group (LGHAG) which was formed in 2007 following early proposals for development of the site in December 2006. It was established to ensure that any development of the site was sustainable, high-quality and sympathetic to the surrounding area. In particular it was concerned to retain the existing heritage buildings, surrounding greenspace and trees.

1.3. LGHAG brings together representatives from the North Hyde Park Neighbourhood Association, South Headingley Community Association, Headingley Development Trust, Headingley Network, Cardigan Triangle, Leeds HMO Lobby and Little Woodhouse Community Association. All of these community groups have particular interests in the local area around and near the school site.

1.4. LGHAG held public meetings to discuss the various proposals for development on the site, including the draft Planning and Development Brief prepared by the applicants in partnership with Leeds City Council in May 2007, the initial planning applications for the site submitted in July 2008 and the revised applications submitted in November 2009, all of which resulted in overwhelming opposition to the plans. As part of its own local consultation process LGHAG also held public workshops in May 2008, following which a Community Planning Brief for the site was prepared and

published. The brief proposed development of the northern part of the site along Headingley Lane, retaining Rose Court and the Main School building, whilst leaving the southern part of the site between those buildings and Victoria Road (allocated as Protected Playing Pitches in the Leeds Unitary Development Plan) as open recreation space available to the community.

- 1.5. Apart from one public meeting in December 2009 at which the applicants' agents described the proposed developments, there was no dialogue between the applicants and LGHAG or the wider local community about either the applicants' plans or the Community Planning Brief
- 1.6. As a background to its case, LGHAG will describe the process of community action leading up to and following the applications.
- 1.7. LGHAG has been given Rule 6 status for these appeals, along with three other objectors, each of whom will be dealing with different aspects of the development's implications. LGHAG will deal primarily with the effect of the development on the heritage assets related to the site including the Headingley Conservation Area.

2.0 Design and general arrangement of development

- 2.1. LGHAG will argue that the scale and massing of the proposed development is harmful to the character of the conservation area, particularly the development between Victoria Road and the existing buildings
- 2.2. We will also demonstrate how the proposed layout of the buildings, roads and car parking will create external spaces which are heavily car-dominated and contrary to national and local design advice
- 2.3. The proposed development of blocks along Victoria Road has private gardens facing Victoria Road. We will argue that this arrangement will harm the appearance and character of the conservation area.
- 2.4. An area of open space is included in the development. LGHAG will argue that the form and location of this space will not provide suitable access for the general public. As such, we will argue that it cannot be considered a preferable alternative to the retention of open land which contributes to the

character and appearance of the conservation area.

3.0 Significance of the site in the Headingley Conservation Area

- 3.1. LGHAG will describe the distinctive character of this part of the conservation area in which there are large villas with large south-facing gardens on both sides of Headingley Lane. We will further demonstrate the harm that has been done to the conservation area where development has previously been permitted on some of these villa sites.
- 3.2. LGHAG will demonstrate the significance within the local area of the open quality of the site facing Victoria Road and its contribution to the character of the conservation area. We will also demonstrate how the proposed development will harm that character.
- 3.3. LGHAG will describe the contribution the trees on the site make to the character of the conservation area and will show that the proposed tree removals will harm that character. We will further argue that the proximity of the development to the trees will affect their viability.

4.0 Potential value of the land as recreation land

- 4.1. LGHAG will outline its view that the land has value as recreation space. Evidence on this aspect, however, will be presented by a separate Rule (6) party

5.0 Significance of the land as a setting for Rose Court

- 5.1. Rose Court is a listed building, one of the villas constructed along Headingley Lane in the early 19th century. Its original garden remains open from its recent use as school grounds and tennis courts, extending down to Victoria Road.
- 5.2. We will demonstrate the importance of this open land as the setting for Rose Court and the value of that setting to the conservation area.
- 5.3. We will also show that the proposed development will unacceptably diminish the significance of the listed building by its harmful affect on that setting.

6.0 Significance of the land as a setting for the Main School building

- 6.1. LGHAG will demonstrate that the Main School building is a heritage asset which together with its setting makes a significant and valuable contribution to the character of the conservation area.
- 6.2. We will demonstrate the importance of the open land as a setting for the building and the value of that setting to the conservation area.
- 6.3. We will also show that the proposed development will unacceptably diminish the significance of the heritage asset by its harmful affect on that setting.

7.0 Proposed alterations to Rose Court

- 7.1. LGHAG will argue that the proposed alterations to Rose Court will have a harmful effect on the character of the listed building. We will show that the proposed alterations within the building will reduce the significance of its internal character.
- 7.2. LGHAG will also show that the proposed vehicle access to Rose Court is harmful to the setting of the listed building.

8.0 Proposed alterations to Main School

- 8.1. LGHAG will demonstrate that the proposed partial demolition of, and alterations to, the 1906 Main School building and the total demolition of the 1934 extension will harm the character and significance of the heritage asset.
- 8.2. We will demonstrate the importance of the internal spaces that would be lost, and will argue that they could be retained and utilised.
- 8.3. We will also argue that the southern frontage of the building viewed from Victoria Road is a significant part of the character of the building and the proposed demolition will harm that character.

APPENDIX 1 – DOCUMENTS

LGHAG will draw on the following in evidence:

National Policy:

PPS1
PPS3
PPS5
PPG17

National Guidance

English Heritage:

The Setting of Heritage Assets
Understanding Place
Conservation Principles, Policy and Guidance
Manual for Streets

Local Policy:

Leeds UDP Policy N3
Leeds UDP Policy N6
Leeds SPD Neighbourhoods for Living
Leeds SPD Headingley and Hyde Park Neighbourhood Design Statement
Leeds Statement of Community Involvement

Leeds City Region

Green Infrastructure Strategy

LGHAG reserves the right to draw on other documents if the need arises.

APPENDIX 2 – LIST OF APPEARANCES

Leading the case

Mr John Bowers

Witnesses

Mr Martin Staniforth,
of Leeds Girls' High School Action Group
Mr Peter Baker RIBA MRTPI IHBC