

TRANSPORT AND WORKS ACT 1992
TRANSPORT AND WORKS (INQUIRIES PROCEDURES)
RULES 2004
NETWORK RAIL (HUDDERSFIELD TO WESTTOWN
(DEWSBURY) IMPROVEMENTS) ORDER

REBUTTAL PROOF
RELATING TO PROOF OF EVIDENCE HD1
DEVELOPMENTS LTD (OBJ/34)
Katie Rees-Gill – Historic Environment

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The Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order 19 October 2021

NR/PoE/REB/KR-G/06 Historic Environment Rebuttal

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1. INTRODUCTION

1.1 Introduction

1.1.1 The following is Network Rail's response to the Proof of Evidence of:

- Mr Michael Bottomley on behalf of HD1 Developments Limited

1.2 Structure of Rebuttal

1.2.1 This rebuttal is concerned with the Large Brick Warehouse and Tower in north west corner of railway yard, both owned by HD1 Developments Ltd. The buildings are situated in the former railway goods yard, immediately west of the Grade I Listed Huddersfield Station and are Grade II Listed.

1.2.2 The rebuttal addresses:

- Method and assessment approach, re-affirming the impact assessment conclusions in respect of setting impacts;
- The public and heritage benefits to be realised from the Scheme at Huddersfield Station; and
- How the Scheme meets statutory, national and local policy requirements.

1.2.3 My evidence presented in this Proof draws on the information already published within the ES and heritage assessments.

2. NETWORK RAIL'S REBUTTAL OF OBJECTOR'S EVIDENCE

2.1 HD1 Developments Ltd (OBJ/34)

Historic Environment Assessment Approach

- 2.1.1 Full and thorough, detailed and strategic assessments of the impact of the Scheme proposals on the historic environment have been undertaken.
- 2.1.2 For each of the nine Listed Building Consent applications, a Heritage Assessment has been produced which identifies the impacts of the design proposal on the significance of the structure, in particular the degree of harm to significance in each case and whether that harm is substantial or less than substantial. This is also weighed against a consideration of the public and heritage benefits to be gained from the design proposals in each Heritage Assessment.
- 2.1.3 The assessment as part of the EIA process and within the Heritage Assessments supporting the Listed Building Consent applications, have been conducted in line with current national planning policy within NPPF 2021, Kirklees Local Plan, and statutory guidance of Historic England. The methodology adopted for the assessment within the ES and the scope of the Heritage Assessments were agreed with Kirklees Council and Historic England.
- 2.1.4 The setting impact assessment methodology is set out in Vol 2i: Scheme-wide Assessment, chapter 6 Historic Environment (NR16A). The setting of each asset has been assessed, in accordance with Historic England's The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3. An assessment of the setting of each heritage asset identified within the baseline has sought to understand the contribution of setting to the asset's value. This is summarised in the gazetteers of heritage assets, appended to each Route Section Assessment of the ES. The Historic England Good Practice Note also sets out how an asset's significance, derived from its setting, may be affected by changes to this setting. This has been captured in ES, Vol 3, appendix 6-2 (NR16B).

Assessment of Setting Impacts on Large Brick Warehouse and Tower in north west corner of railway yard

- 2.1.5 I briefly summarise in this section, the approach taken to assessment and the agreed findings, in order to clarify that the impact assessment and resultant conclusion have been carried out in line with agreed methodologies, policy and best practice guidance.

- 2.1.6 I have confidence in the original assessment that found there would be minor beneficial impacts to the large brick warehouse and tower in the north west corner of the former railway yard. The assessment methodology for a magnitude of impact of minor beneficial is defined as limited enhancement to an asset's setting such as small-scale alterations that improve appreciation of the heritage asset. The proposals at the western end of the Station, open-up views between the goods yard buildings and the Station and in so doing enhance the legibility of the historic relationship, improving appreciation of the asset's significance as part of the railway and industrial heritage.
- 2.1.7 Embedded mitigation through design delivered innovative proposals for the new elements at the Station. A conscious design decision was taken with historic environment stakeholders that the new interventions would be honest, modern and complimentary in scale and form to the historic elements. This would add to the development phasing narrative in that the new elements would be clearly definable as part of a new phase in the Station's story. Thus, appreciative of the significance the Station draws from its on-going adaptation. The design proposals were conceived with respect to the western goods yard area, through the shaping of the canopies and the removal of signal relay room to enable opened-up views to the west of the Station which would better reveal the listed warehouse buildings and tower and bring greater awareness of the historic association with the Station.
- 2.1.8 The Scheme at the Station has reversed the eroded relationship between the warehouses, tower and the Station. Historic England welcomes the design approach stating in their representation (REPS02): *'The new canopies take opportunities to open up new views through to the warehouse and reconnect people's perceptions of this side of the station.'*

Assessment of Setting Impacts on Fitzwilliam Street, St George's Street and Westgate

- 2.1.9 I set out below the impact assessment undertaken for Listed Buildings situated on Fitzwilliam Street, St George's Street and Westgate. This is in order to demonstrate that the settings and wider views of important designated assets in proximity to the Huddersfield Station Scheme were properly considered and analysed as required in the agreed methodology for the ES and Heritage Assessment for Huddersfield Station.
- 2.1.10 The historic environment assessment took account of a number of listed buildings located in proximity to Huddersfield Station, including those located on Fitzwilliam Street, St George's Street and Westgate, which are afforded views towards the Station from the north and south. Assessments were

made on the potential for impacts on their significance resulting from change within their settings from the construction and operation of the Scheme.

- 2.1.11 The assessment found that there would be no permanent impact on the significance of the Grade II Listed properties on Fitzwilliam Street (numbers 72-78; 82 and 84) and Freemason's Hall as a result of changes within their settings arising from the development of the Scheme at Huddersfield Station. Though the proposals would change the appearance of the west side of the station in these views, this would not alter the overall character of the views, nor the understanding of the historic environment around the station which such views evidence. The proposals would not detract from the extent to which these Listed Buildings derive significance from their setting, nor would there be an impact on the overall significance of the Listed Buildings. The assessment methodology for a magnitude of impact of no change is defined as no appreciable change to the asset's significance, in which there is no loss or alteration of characteristics, features, or elements from either direction (adverse or beneficial).
- 2.1.12 1 and 3 St George's Street was assessed to have visible change within its setting due to its proximity to Huddersfield Station. I believe the original assessment from the ES still stands in that, although there is visible change, this change does not alter the context and relationship between 1 and 3 St George Street and the Station. In my opinion, there is no appreciable alteration to the significance of the St George's Street Listed Buildings as a result of the permanent changes within their setting.
- 2.1.13 The assessment found that there would be no permanent impact on the significance of the Grade II Listed properties on 34-42 Westgate as a result of change within their settings arising from the development of the Scheme at Huddersfield Station. The assessment methodology for a magnitude of impact of no change is defined as no appreciable change to the asset's significance, in which there is no loss or alteration of characteristics, features, or elements from either direction (adverse or beneficial). 34-42 Westgate, at its St George's Street elevation, is identified as having visible change in its setting from the Huddersfield Station works. I believe the original assessment from the ES still stands in that, although there is visible change, this change does not alter the context and relationship between 34-42 Westgate and the Station. In my opinion, there is no appreciable alteration to the significance of the Listed Buildings resulting from the change in its setting.
- 2.1.14 Huddersfield Station and the associated historic railway infrastructure makes a considerable contribution to the significance of the Conservation Area. This is particularly notable in the localised townscape and architectural character

of the northern part of the Conservation Area, as well as the historic importance of the Station as a catalyst for the wider historic development of Huddersfield town centre during the mid-19th century. There is no severance, disassociation, or interruption to the relationship either associative or visual between the historic buildings within this part of the Conservation Area, as a result of the Huddersfield Station Scheme proposals. Therefore, I conclude that there is no impact on the significance of the settings of the Listed Buildings within these streets.

Public and Heritage Benefits of Scheme at Huddersfield Station

2.1.15 The public and heritage benefits delivered by the Scheme at Huddersfield Station would outweigh any harm to the Station. As covered in the Huddersfield Station Heritage Assessment, benefits include:

- Improvements to staff and passenger safety through signal sighting and platform widths;
- Improvements to passenger movement, orientation and evacuation;
- Better operational efficiency with additional lines and better track alignments resulting in less train congestion;
- Better station environment with increased canopy coverage and improved lighting for passenger comfort; and
- A fully accessible Station to meet all passenger needs.

2.1.16 The Heritage benefits comprise:

- Extending lifespan of the principal train shed through targeted strengthening works using latest technology;
- Re-instatement of historic forms (Train shed roof lantern and lost bays at northern end) to re-establish architectural significance;
- New views afforded from the footbridge, further enhancing understanding of the Station's surrounding landscape as well as appreciation of its internal features;
- Conserving the tea rooms; and
- Removing redundant Station components to improve environment and setting.

2.1.17 There are wider benefits delivered by the Scheme which are set out in the Statement of Aims (NR04).

Planning Guidance and Policy

- 2.1.18 The Scheme at Huddersfield Station meets statutory, national and local policy requirements.
- 2.1.19 The level of assessment on the warehouses and the other Grade II Listed Buildings on the streets in proximity to Huddersfield Station, has been more than sufficient and more than meets the requirements set out in NPPF, 2012, para 194: *‘The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.’*
- 2.1.20 Kirklees Local Plan Policy LP35, item 3e, refers to the need to enable development using innovative ways that does not harm significance of heritage assets:

‘Proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area and ensure they are appropriately conserved, to the extent warranted by their significance, also having regard to the wider benefits of development. Consideration should be given to the need to:

e) accommodate innovative design where this does not prejudice the significance of heritage assets;’

- 2.1.21 The Scheme meets this policy in responding to the required changes to historic features, in a manner that enhances appreciation of historic significance and in which new designed elements compliment the character of the historic elements. This is achieved in an arrangement that does not overshadow or detract from the historic elements which contribute to the significance of the Station.
- 2.1.22 Kirklees Council, in the Report of the Head of Planning and Development to the Strategic Planning Committee (12-May-2021) discussed the three Listed Buildings in the former goods yard and states in para 10.53 that:

‘The design of the proposals serve to improve the legibility of the historic relationship between the main station complex and these assets. The setting of all three listed buildings is defined by their historic relationship with the station, evidencing their shared historical value and group value. Though the proposals would introduce new elements into this setting, which would reinforce appreciation of their historic functional relationships and thereby the understanding of this element of the assets’ significance.’

- 2.1.23 In para 10.55, the report summarises:

‘It is, therefore, considered that the Huddersfield Station proposals would not detract from the setting of the above identified adjacent listed buildings, nor would they diminish their overall heritage significance.’

- 2.1.24 Kirklees Council, in the Report of the Head of Planning and Development to the Strategic Planning Committee (12-May-2021) states in conclusion (para 11.2 and 11.3) that:

‘The evident public benefits that would arise from the Transpennine Route Upgrade provide the necessary justification in terms of NPPF paragraph 196¹ and Local plan policy LP35 to support for the proposed Listed Building Consent for works at Huddersfield Station.’

‘The proposed works are consequently considered to meet the requirements of NPPF paragraphs 189, 193² and 196, as well as Local Plan policy LP35 Historic Environment.’

- 2.1.25 This demonstrates that the assessment and justification for the Scheme has been deemed more than sufficient to have enabled decision-making in taking into account the balance of harm against the public benefits offered.

Conclusion

- 2.1.26 To conclude, the assessment has been done properly in accordance with the agreed methodology and at the right level of detail required for the warehouses and surrounding listed buildings, as set out in NPPF, para 194.
- 2.1.27 The setting assessment findings on the listed buildings, as repeated in this Proof, reflect an accurate analysis of the nature of the impacts on their significance. These findings are supported by Kirklees Council and Historic England.
- 2.1.28 The public and heritage benefits achievable at the Station, and in respect of the improved connectivity between the warehouses, goods yard and Station, are considerable and on balance outweigh any level of harm to the Station to satisfy para 202 in NPPF 2021 and Kirklees Local Plan Policy LP35. This will bring forward a new phased development at the Station fitting for 21st century travel that also embodies a celebration of the mid and late 19th century historic development phases of engineering and architectural design.

¹ Please note that this is now para 202 in NPPF July 2021

² Please note that this is now para 194 and para 199 respectively in NPPF July 2021

3. WITNESS DECLARATION

3.1 Statement of declaration

3.1.1 The named witness hereby declares as follows:

- (i) This proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion.
- (ii) I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.
- (iii) I understand my duty to the Inquiry to help it with matters within my expertise and I have complied with that duty.

19 October 2021