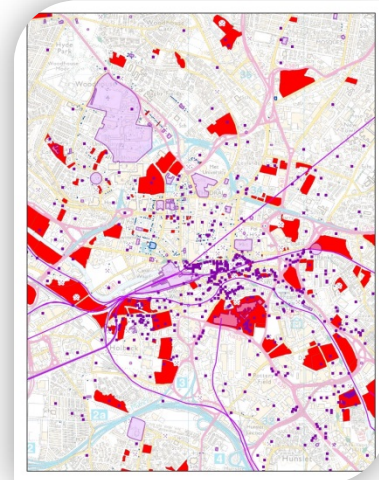


Executive Summary

The government has made the case for developing brownfield land in order to help address the housing shortage in England.

Using Leeds city centre as a case study, this assessment evaluates the likely scale of brownfield development, and its potential impact on historic fabric and places. This revealed that (potentially) we currently underestimate the number of historic assets and places that might be impacted by brownfield development.



There is analysis of the opportunities for enhanced understanding of the significance and value of those places selected for potential brownfield development. The report also frames the scope of our potential response and engagement with the development proposed.

Consultees

Victoria Thomson, Andrew Vines, John Cattell, Owain Lloyd-James, Jen Heathcote, Daniel Miles.

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Introduction

Government land use statistics collected from each local authority in 2010¹ identified that there were approximately 68,910 hectares of ‘brownfield land that is unused or may be available for redevelopment’. Much of this land is located in urban areas and approximately 35,000 hectares of this land is considered suitable for housing. The Housing White paper² sets out the wider, strategic, case for brownfield development, principally, the need to make

‘...more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.’

Underpinning this is a clear understanding that residential development opportunities on small sites should be treated positively³. Regulations governing the introduction of a *Brownfield Land Register* came into force on 16th April 2017⁴ and guidance was published in July 2017⁵. In addition to this, a national data standard for Brownfield Land Registers was also released⁶.

This assessment evaluates the likely scale of brownfield development, its potential impact on historic fabric and places, and the prospects this development offers for enhanced understanding of the significance and value of those places selected for potential development. There are opportunities here to engage with, and encourage, good design outcomes that can enhance places too. The report also frames the scope of our potential response and engagement with the development proposed.

¹ <https://www.gov.uk/government/statistics/national-land-use-database-of-previously-developed-land-2010-nlud-pdl>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

³ Note, though, that the relationship is much more complex than this. Previous discussions have also included small greenfield options too.

⁴ http://www.legislation.gov.uk/uksi/2017/403/pdfs/uksi_20170403_en.pdf

⁵ <https://www.gov.uk/guidance/brownfield-land-registers>

⁶

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653657/BrownfieldLandRegisters_-_DataStandard.pdf

Context

What is Brownfield Land?

The National Planning Policy Framework⁷ defines brownfield as

“land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:

- *Land that is, or has been, occupied by agricultural or forestry buildings*
- *Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures*
- *Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments*
- *Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time”.*

Land ascribed as ‘brownfield’ is diverse and ranges from spaces such as redundant quarries, 1960s industrial estates or cleared, former industrial, locations, all the way up to large areas of historic cities with deeply stratified urban archaeological deposits.

The scale of the issue

Government land use statistics from 2010⁸ identified that there were close on to 69,000 hectares of ‘brownfield land that is unused or may be available for redevelopment’. Much of this land is located in urban areas and approximately 35,000 hectares of it is considered suitable for housing. It is, though, probable that the re-draft of the NPPF will see this figure revised upwards. The Housing White paper⁹ sets

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁸ <https://www.gov.uk/government/statistics/national-land-use-database-of-previously-developed-land-2010-nlud-pdl>

⁹ <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

out the case for brownfield development, principally, the need to make ‘...more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land.’ Underpinning this is a clear understanding that residential development opportunities on small sites should be treated positively. Seventy-three local authorities were selected to participate in a pilot Brownfield Register project¹⁰ but an initial (independent) review stated that the process is failing to identify and record small brownfield locations that could provide space for an additional c. 200,000 homes across England¹¹.

The CPRE reported that ‘brownfield land has the capacity to support over 1.8 million new homes. However, despite the identified high housing capacity (a substantial increase on previous estimates and certainly a greater number than that suggested by the government), the most recent Government figures have shown that the proportion of new dwellings delivered on brownfield land has fallen significantly from 81% in 2008 to just 68% in 2011. It is likely that this has decreased further to 2014.¹² The CPRE also notes ‘that the study of the 53 pilot registers produced a figure – 273,000 – that is both higher than previous Government estimates of countrywide brownfield housing capacity, and almost enough for the participating councils to meet their five-year housing targets without releasing any countryside for development’.

Some initial scoping analysis was undertaken by Historic England, assessing the potential impacts of the Leeds city centre brownfield options, in order to develop an effective working method (see below). This was successful and illustrates the need to include as many related datasets as possible in the assessment – the more data, the better the analysis – but, crucially, it also reveals that (potentially) we currently underestimate the number of historic assets and places that might be impacted by brownfield development.

Government policy

In the Housing White Paper, the Secretary of State outlined the strategic drivers underpinning the regeneration of previously developed land:

¹⁰ The data relating to the pilot study can be accessed at <https://data.gov.uk/dataset/brownfield-land-register-cbc>

¹¹ <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4726-unlocking-potential-best-practice-for-brownfield-land-registers>

¹² CPRE Report, 2014 – From wasted space to living spaces - <http://www.cpre.org.uk/media-centre/news-release-archive/item/3784-england-has-space-for-at-least-1-million-homes-on-brownfield-land>

1.24 We must make as much use as possible of previously-developed ('brownfield') land for homes – so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside. The Government is already pursuing a number of reforms to make this happen.

1.25 Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as high flood risk). To make this clear, we will amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes, following the broad support for this proposal in our consultation in December 2015.

The development of brownfield sites, in the Green Belt, will be considered but only where it contributes to the target provision of starter homes, and where it does not impact on the character (openness) of the Green Belt.

The Housing White Paper largely confirms an existing emphasis on brownfield development which has already been set out in the NPPF, as well as the Housing and Planning Act – please see Historic England's response to the proposed planning change¹³ and an earlier response to the 2015 NPPF consultation¹⁴.

In addition, the more recent Historic England response to the Housing White Paper¹⁵ cites a number of concerns about the impact of the emerging policy on brownfield development. And our response to 'Right Homes in the Right Places'¹⁶ also underscores our strategic approach to the issues surrounding the provision of local housing.

As part of this drive to ensure open access to areas of potential brownfield development, the government now requires that all Local Authorities maintain a

¹³ <https://content.historicengland.org.uk/content/docs/consultations/technical-consultation-planning-changes-response-apr16.pdf>

¹⁴ <https://content.historicengland.org.uk/content/docs/consultations/DCLG-consultation-response-on-national-planning-policy-feb16.pdf>

¹⁵ <https://content.historicengland.org.uk/content/docs/consultations/he-response-dclg-housing-white-paper-may17.pdf>

¹⁶ <https://content.historicengland.org.uk/content/docs/consultations/he-response-dclg-consultation-planning-right-homes-right-places-nov17.pdf>

‘Brownfield Register’^{17, 18} and an application for development can also be made through the Permission in Principle (PiP) regime¹⁹. There is a formal requirement in the Housing and Planning Act 2016 for registers to be kept and the intention is that the Register will ensure that nationally consistent information on suitable brownfield sites is kept up-to-date and made publicly available for communities and developers. These registers provide a platform for granting permission in principle for housing on suitable sites, ‘giving early certainty to landowners, developers and communities’ (guidance is available^{20, 21}). In addition to this, there are a series of initiatives that have been launched to encourage the use of brownfield for development. These include:

- making £3 billion of loan funding for developers available through the Home Building Fund announced in October 2016, with an emphasis on supporting developments on brownfield land.
- designating 26 Housing Zones with the potential to deliver up to 44,000 new homes on brownfield land. The London programme, which is devolved to the Mayor, incorporates 31 Zones expected to deliver 77,000 new homes.
- continuing to use the £1.2 billion Starter Homes Land Fund to bring forward suitable brownfield land for starter homes and other types of affordable home ownership products. Thirty local authority partnerships, working with the Homes and Communities Agency, were announced in January 2017 to help identify suitable sites.

The first round of registers should have been in place by the end of December 2017, and to a tightly defined format²², but approximately 20% of local authorities missed this deadline²³.

¹⁷ Town and Country Planning (Brownfield Land Register) Regulations 2017. The pilot Brownfield Registers exclude Greater London: the London Land Commission published its own Brownfield Register of publicly owned sites in January 2016. Note that the Register comprises two parts: Part 1 – brownfield land suitable for housing; Part 2 – sites that come with permission in principle to develop.

¹⁸ <http://legislation.data.gov.uk/ukxi/2017/402/made/data.pdf>

¹⁹ <https://www.gov.uk/guidance/permission-in-principle>

²⁰ <https://www.gov.uk/guidance/brownfield-land-registers>

²¹ <https://www.gov.uk/guidance/permission-in-principle>

²² <http://www.legislation.gov.uk/ukxi/2017/403/contents/made>

²³ <http://www.elexica.com/en/legal-topics/real-estate/280218-brownfield-land-registers-come-into-effect-but-councils-miss-deadline>

Profiling where the greatest weight of impacts might lie shows that there is an uneven distribution of available brownfield sites in England. Government analysis suggests that the North West region contains the most (20% or 7080 hectares) followed by the South East (18% of the total, or 6170 hectares). The East and West Midlands, for example, together contain just 5360 hectares or 15% of England's brownfield land.

Issues

Why should we be interested?

The CPRE neatly capture the wider, public, benefits of developing on brownfield land²⁴ saying that

'It makes social, environmental and economic sense for most new development to occur in built-up areas where infrastructure and services are already in place, or can be more easily provided, rather than in the countryside. Brownfield development is essential for urban regeneration. Done well, it brings homes, jobs and services closer together, reduces car dependence and enhances local environmental quality and local communities.'

The inclusion of sites on brownfield registers should not mean development being agreed without necessary safeguards and there are concerns about the efficacy of these, e.g. how do you apply the NPPF without sufficient information in support of PiP entries? Local planning authorities will still be expected to take account of the NPPF when identifying sites suitable for granting permission in principle for sites on brownfield registers. However, given their locations, such sites may have increased archaeological interest and development will have the potential to greatly impact on local character, i.e. brownfield developments may have a greater impact on the historic environment than other locations.

The proposals outlined in the Housing White Paper constitute change to the NPPF and do raise a number of concerns, specifically, about a potential shift in the overall balance of policy:

- The identified housing requirement is to be accommodated unless other NPPF policies (including heritage) provide strong reasons not to; this also

²⁴ Campaign to Protect Rural England (2008) The Campaign to Protect Rural England's Policy on Brownfield Land, Campaign to Protect Rural England

presupposes that the new housing requirement assessment methodology will itself be acceptable.

- There is a proposed presumption that brownfield land is suitable unless there are ‘clear and specific reasons to the contrary’; ‘great weight’ is to be attached to the value of using brownfield land in settlements.
- Allowing development on brownfield land in the Green Belt, but only where it contributes to the delivery of starter homes and there is no substantial harm to the openness of the Green Belt.

The draft revision to the NPPF²⁵ (published March 2018) re-affirms these principles but further change in the final version should be anticipated.

Potential responses: the case for strategic research

Whilst the wider sector appreciates the generic impact on the historic environment from any proposed brownfield development, the route to clearly understanding the implications in specific places may be more challenging to identify. To do so, actions are needed to:

- be proactively engaged with the potential impact flowing from brownfield development (i.e. impact stemming from proposals and applications to develop sites on the register)
- ensure that there is a proper consideration of historic environment-related issues in any proposed development – in all environments, not just on urban sites
- provide mechanisms for the careful, and early, screening of those places earmarked for brownfield development
- early assessments of the resource requirement [to address emerging brownfield development] for an already stretched professional sector is essential. Local Planning Authorities are already facing significant resource and funding issues.
- be innovative in how we assess and address the likely impacts of development, and exploit the opportunities too.

25

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf

- this demands a more collegiate and connected way in which the wider sector, as well as relevant agencies (including Historic England), address brownfield issues and work towards outcomes that benefit the historic environment, people and places.

The pressing issue of brownfield development is specifically mentioned in Historic England's Research Agenda²⁶, as part of the Theme: #adapt:

Central government set the overall policy direction and framework for the planning system operated by local government, and set regulation for specific issues, such as the redevelopment of former industrial or 'brownfield' development, and levels of housing development. Research questions that will help our mission include:

How do we enable sustainable brownfield development while protecting archaeological interest and retaining local character?

A current project, *Increasing Housing Density* (HE Project No: 7631), is directly related to brownfield development and will improve our understanding of the different approaches taken to ensure that developers acknowledge and seek to preserve local character. It may well be that the results from this project – which is focusing on assessing the qualities of acceptable development schemes in historic contexts – can be layered into an agreed methodological protocol for assessing the impact of development on the historic environment.

The CPRE noted recently the, as yet unrealised, potential in 'Plotting the location of every identified brownfield recorded on GIS maps covering local authority or strategic housing market areas can increase understanding about the nature of sites available. Assessing sites over a wide area can directly aid decisions on the most appropriate uses for sites and allow the prioritisation of individual sites for development'.²⁷

Historic England concur with this statement. In response, there is clear value in:

²⁶ <https://content.historicengland.org.uk/images-books/publications/he-research-agenda/research-agenda.pdf/>

²⁷ <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/3877-better-brownfield>

- Collating and assessing all sites (for historic/heritage value) on the Brownfield Register on a GIS platform (see Leeds City Council Brownfield Register case study).
- Using GIS analysis, work out which sites are themselves ‘historic’ in character, as well as those which intersect or abut known heritage assets, and those which overlie buried archaeological resources.
- Cross-reference the data with any other relevant mapped sources, such as Historic Landscape Characterisation or Extensive Urban Surveys, in order to provide a more detailed contextualised understanding of any heritage asset and its setting.

In summary, it is important to emphasise the potential role of early (i.e. desk- or GIS-based) screening and ‘strategic’ assessment of spaces and places earmarked as part of brownfield development. The data, and its analyses, can then be combined with a range of other spatial datasets and form a significant component in digital assessments of threats and risk to the historic environment, across England. In terms of the brownfield aspect, we could, for example, envisage a screening of a whole authority’s Brownfield Register (or even all the brownfield land in a larger area, such as a region?) in which we categorise sites according to their ‘heritage issues’ – no problems envisaged, minor issues, or major, ‘show stopping’, problems. This approach, and an investigative method built upon it, might help tease out which sites are potentially less onerous (from a heritage perspective) to deliver development on, and which ones are not (and, therefore, require a greater amount and range of resources, and time, to remediate) – bearing-in-mind that delivery is major governmental driver.

This work can be collated rapidly and easily, as long as the relevant datasets are available – and the brownfield registers are accessible. When the data is in place, analyses can be done very quickly indeed – a matter of hours, days at most – such as that outlined below in the pilot study for the Leeds city centre sites.

Leeds City Council Brownfield Register – Site Allocations Pilot

Approximately 800 hectares of land are recorded on the Leeds City Council Brownfield Register (Fig. 1) and the following case study presents a basic analysis of the potential impact from development. More detailed, GIS-based, analyses could be undertaken, and other aspects factored in too (such as data from the Leeds City Centre *Areas of Archaeological Sensitivity* survey). In this case study a simple ‘headcount’ of known assets is presented, in mapped and tabular format. The locations of the brownfield

sites vary dramatically and include areas on the peripheries of built-up areas but also a range of options within the heart of Leeds city centre itself. Previous, and existing, land use within the allocated land parcels is equally diverse and includes open and cleared spaces, others formerly used for commercial purposes (such as warehouses, industrial estates) or related to local transport hubs (former bus stations and terminals). A smaller number comprise existing and derelict residential properties and estates.

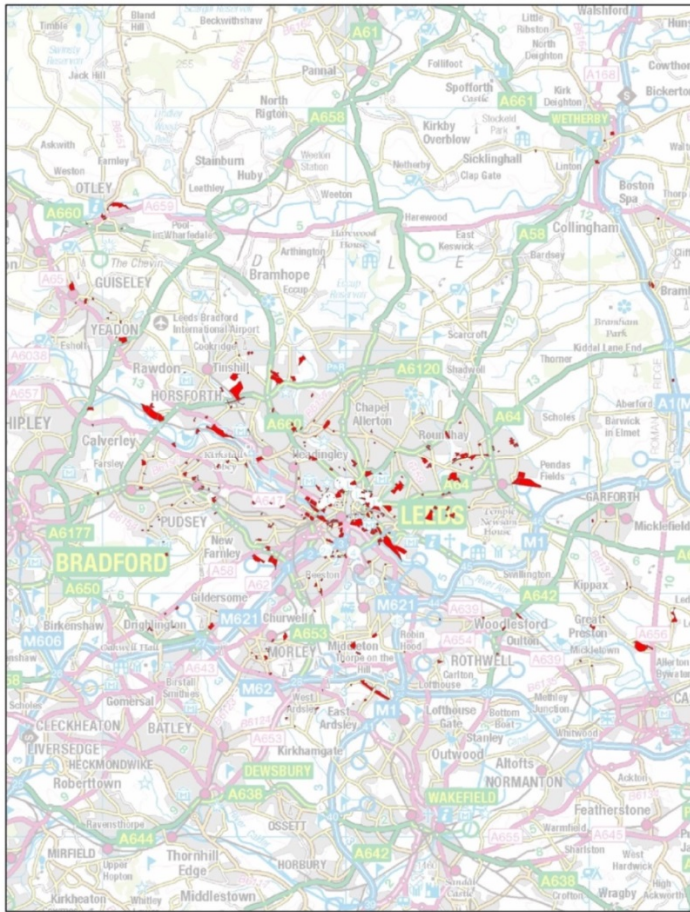


Figure 1: Location of sites on Leeds City Council Brownfield Register. © Crown Copyright and database right 2018. All rights reserved. Ordnance Survey Licence number 100024900.

It is not known how many of these buildings and areas, shown in Figure 1, have any sort of ‘heritage significance’ or value to the local community. Previous assessments of brownfield development at a national level, suggest that in only a very small

number of cases (3%) there is impact on existing historic environment fabric²⁸. Focusing on Leeds city centre (Fig. 2) a different picture emerges.

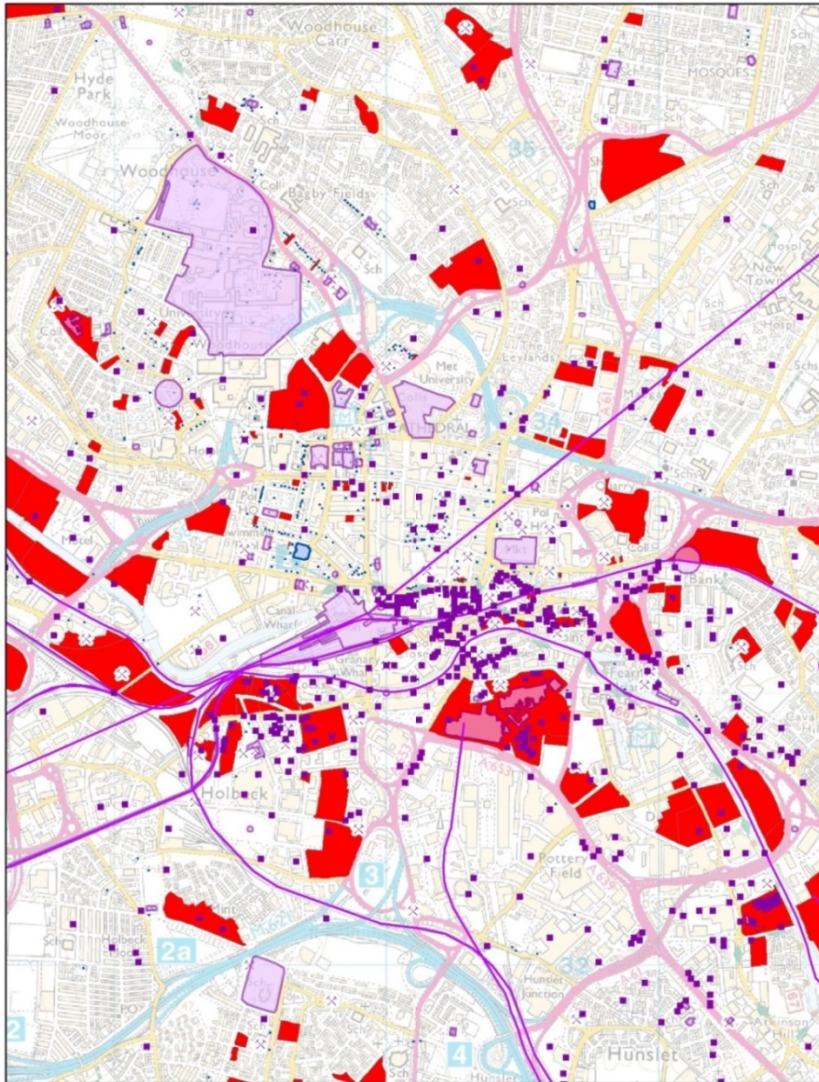


Figure 2: This map focuses on the core of Leeds city centre. The brownfield allocations are shown in red, designated assets in blue, undesignated in purple. © Crown Copyright and database right 2018. All rights reserved. Ordnance Survey Licence number 100024900.

²⁸ Historic England's Government Advice Team response to information request from DCLG on: the proportion of applications for planning permission that involve archaeology; the proportion of brownfield sites that will have archaeological interest.

Figure 2 immediately reveals that there are strong overlaps between the location of land being made available for brownfield development, and the survival of historic assets (designated or not). Indeed, it is estimated that at least 40% of the allocated sites either intersect with, or are adjacent (within 100 metres) to known and suspected historic fabric. In total, 68 Listed Buildings, two Scheduled Monuments, and one Registered Park and Garden (see Appendix) are at direct risk (i.e. directly impacted by a proposed development site, or within 100m of it) when assessed against the Leeds City Centre Brownfield Register.

Conservation Area data then overlaid suggests how a further refining of sensitivity to change might be applied. The map excerpt (Figure 3) shows Leeds city centre brownfield development options, Conservation Areas, and the location of Listed Buildings that lie within both, i.e. Listed Buildings, within a Conservation Area, that are at threat from development. There are a further nine Listed Buildings that are threatened with development but which lie outwith any Conservation Area.

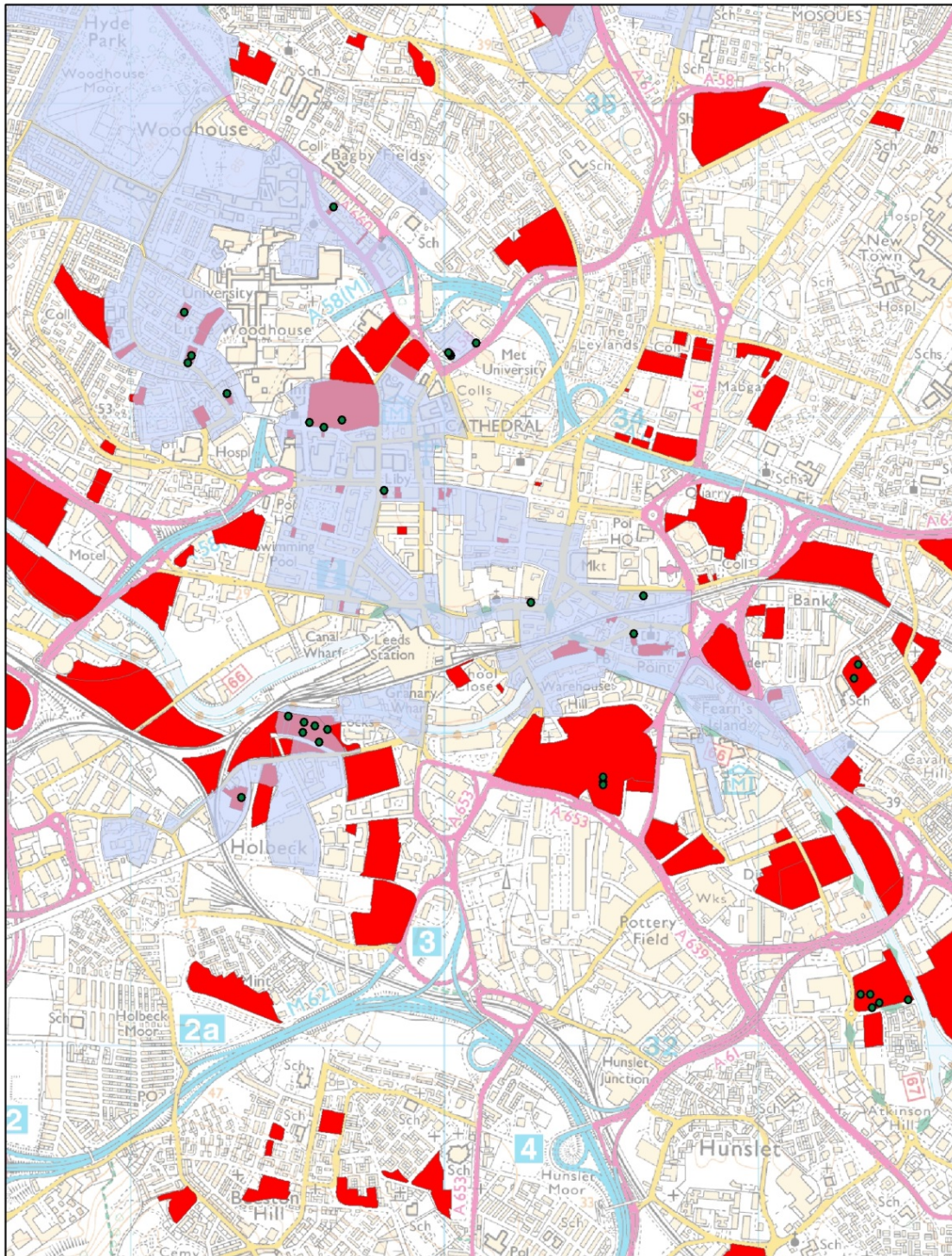


Figure 3: Leeds City Centre Brownfield allocations (red) assessed against Conservation Areas (light blue) and Listed Buildings (green) © Crown Copyright and database right 2018. All rights reserved. Ordnance Survey Licence number 100024900.

Conclusion

Historic England are statutory consultees on both the Register and on PiP/TDC but a number of concerns remain:

- the lack of information available in support of permission in principle (PiP) decisions (i.e. not enough to properly apply NPPF and local policy).
- lack of clarity in the requirements for Technical Details Consents (TDC) as part of the process of granting permission for development.
- the potential cost of revocation if information emerges later that suggests permission in principle was an error.
- the potential pressure on LPAs to use this route when 'normal' planning routes are much more appropriate.

In order to address these issues, there is a clear advantage in developing options for 'next steps' that could provide significant operational gains for Historic England.

These options may well aid our ability to:

- undertake work that alerts us (and the wider sector) to the potential impacts of brownfield development.
- get 'ahead of the curve' (in terms of managing our casework load) and assess and respond in a timely fashion to specific brownfield development proposals and their likely impact on historic fabric and setting.
- allows us to act proactively in terms of responding to the proposed development, contributing to TDC as part of the process of granting permission to develop.
- to engage with, and influence, decision-making with Local Authorities and those promoting or funding the brownfield development.
- sensitise developers, business owners, and the wider community to the importance of the historic environment (visible and hidden)
- assert the value of incorporating all historic fabric in any proposed development.

APPENDIX

Table 1: Listed Buildings impacted by the Leeds City Council brownfield allocation.

OBJECTID	List Entry	GISGROUPUI	Name	Grade
199633	1237569	429725	LEDSTON HALL	I
217104	1256242	234606	LEEDS GENERAL INFIRMARY	I
224579	1264075	241404	ENTRANCE GATES AND LODGES	I
199585	1237514	388784	GARDEN HOUSE AT NORTH END OF WEST TERRACE OF LEDSTON HALL	II*
216446	1255558	234012	ST MARYS CONVENT CHURCH	II*
217108	1256246	416459	TOWER WORKS, BOILER HOUSE CHIMNEY	II*
217109	1256247	433052	TOWER WORKS, THE GIOTTO TOWER DUST EXTRACTION CHIMNEY	II*
224525	1264016	241354	GATE PIERS ON FORMER DRIVE APPROXIMATELY 150 METRES NORTH OF LEDSTON HALL	II*
327467	1375329	338752	SPENFIELD	II*
367792	1256253	438898	HUNSLET MILL	II*
69663	1096064	94695	MIDLAND JUNCTION FOUNDRY	II
165392	1200561	186024	BARN ON NORTH SIDE OF FARMYARD ADJACENT TO WEST SIDE OF HEADLEY HALL	II
199482	1237401	218166	THE ROYAL OAK	II
199539	1237465	426049	33-37, HIGH STREET LS25	II
209144	1247687	227136	LOGGIA IN SUNKEN GARDEN FORMING SOUTH END OF TERRACE TO WEST OF LEDSTON HALL	II
209146	1247689	227138	STATUE IN SUNKEN GARDEN APPROXIMATELY 100 METRES WEST OF LEDSTON HALL	II
211765	1250517	229611	FORMER COACH HOUSE TO REAR OF HOUSE OCCUPIED AS OFFICES BY RENTOKIL LIMITED	II

216447	1255559	439519	PRESBYTERY AT ST MARYS CONVENT CHURCH	II
216448	1255560	234014	1, CHURCH ROW	II
216457	1255569	445265	37 AND 39, HUNSLET ROAD (See details for further address information)	II
216459	1255571	430175	NUMBER 41 AND ATTACHED WALL AND RAILINGS	II
216477	1255593	234041	IDA CONVALESCENT HOSPITAL	II
216478	1255594	455142	LODGE AT COOKRIDGE HOSPITAL	II
216479	1255595	444962	OLD BLOCK AT COOKRIDGE HOSPITAL	II
216480	1255596	234043	POST BOX AT COOKRIDGE HOSPITAL SOUTH WEST OF LODGE	II
216504	1255621	234067	FORMER YORK ROAD LIBRARY AND BATHS	II
216516	1255633	234076	BLENHEIM TERRACE NUMBER 22	II
216671	1255791	234215	UPPER WORTLEY PRIMARY SCHOOL	II
216884	1256012	439504	ROSE COURT WITH TERRACE WALL AND STEPS (LEEDS HIGH SCHOOL FOR GIRLS)	II
216908	1256036	234430	RETAINING WALL TO LEEDS ZOOLOGICAL AND BOTANICAL GARDENS	II
216910	1256038	409218	19, SPRINGFIELD MOUNT	II
216918	1256046	406526	GARDEN WALL TO NORTH AND WEST AND SUMMERHOUSE TO WEST OF ARNCLIFFE	II
216919	1256047	429539	CHAPEL ALLERTON HOSPITAL	II
216920	1256048	234440	22D, SHIRE OAK ROAD	II
216956	1256087	423373	ARNCLIFFE	II
217052	1256186	438826	NUMBERS 17 AND 18 AND ATTACHED RAILINGS	II
217055	1256189	234560	21, QUEEN SQUARE	II
217056	1256190	234561	22, QUEEN SQUARE	II
217058	1256192	234562	23, QUEEN SQUARE	II

217105	1256243	415220	BOUNDARY WALL AND RAILINGS TO LEEDS GENERAL INFIRMARY WITH GATE PIERS AND GATES	II
217106	1256244	234608	GLOBE IRON FOUNDRY FITTING UP SHOP	II
217107	1256245	449353	TOWER WORKS ENGINE HOUSE	II
217113	1256251	455250	VICTORIA WORKS RANGE	II
217114	1256252	234616	MILL RANGE ATTACHED TO WEST SIDE OF NUMBER 21A	II
217150	1256289	423673	TOWER WORKS, ENTRANCE RANGE	II
217200	1256342	434119	VICTORIA FLAX MILL ENTRANCE RANGE AND BOLLARDS	II
217502	1256648	421411	KIRKSTALL FORGE FORGE BUILDINGS WITH HELVE HAMMERS, SLITTING MILL MACHINERY	II
217503	1256649	430977	KIRKSTALL FORGE FORMER COTTAGES NOW OFFICES	II
217504	1256650	452111	KIRKSTALL FORGE FORMER STABLES NOW GARAGES	II
217505	1256651	442189	KIRKSTALL FORGE MILESTONE EAST OF EAST GATEWAY	II
224503	1263992	241333	STEPS IN CENTRE OF GRASSED TERRACES OF SUNKEN GARDEN TO WEST OF LEDSTON HALL	II
224580	1264076	392210	GATE AND STEPS AT SOUTH EAST CORNER OF SUNKEN GARDEN TO WEST OF LEDSTON HALL	II
270294	1313456	284549	HOUSE OCCUPIED AS OFFICES BY RENTOKIL LIMITED	II
306244	1352697	318941	BOILER HOUSE CHIMNEY	II
327223	1375067	338527	BURLEY HOUSE	II
327234	1375078	338538	CLARENDON HOUSE	II
327235	1375079	338539	BOUNDARY WALL TO NUMBER 20 CLARENDON HOUSE	II

327375	1375232	338670	46 AND 48, NEW YORK STREET	II
327403	1375260	437471	16 AND 18, CROWN POINT ROAD (See details for further address information)	II
327488	1375355	338777	7, DUNCAN STREET	II
327493	1375361	338783	PEARL BUILDINGS	II
			PEARL CHAMBERS	
327582	1375460	338870	CLIFF HOUSE	II
			CLIFF HOUSE SCHOOL	
327597	1375476	425475	MEANWOOD PARK HOSPITAL	II
344844	1393307	404127	K6 TELEPHONE KIOSK	II
345074	1393509	354593	ADEL REFORMATORY	II
345075	1393509	354593	ADEL REFORMATORY	II
367793	1256355	234707	FORMER DRYING HOUSE PART OF VICTORIA FLAX MILL COMPLEX	II
371588	1375462	338871	LODGE, GATE PIERS, GATES TO CLIFF HOUSE AND FLANKING WALLS	II

Table 2: Scheduled Monuments impacted by the Leeds City Council brownfield allocation.

OBJECTID	ListEntry	GISGROUPUI	Name
28858	1018814	23550	Stone hut circle settlement in Clayton Wood on the south west side of Iveson Drive
28364	1018553	22617	Medieval farmstead in Ireland Wood, 150m north east of Cookridge Hospital

Table 3: Registered Parks and Gardens impacted by the Leeds City Council brownfield allocation.

GISGROUPUI	Name	HeritageCa	Grade
1257	LEDSTON HALL AND PARK	Park and Garden	II*
