
THE VICTORIAN SOCIETY

The champion for Victorian and Edwardian architecture

Ms Kate Mansell
Planning
Kirklees Council
By email

Your reference: 2020/65/90480/W
Our reference: 157318

DC.Admin@kirklees.gov.uk

25 March 2020

Dear Ms Mansell,

RE: Parkwood Methodist Church, Parkwood Road, Longwood, Huddersfield, HD3 4TT (Grade II, 1868): Listed Building Consent for alterations to convert former church to 12 residential units, formation of parking areas and widen vehicular access (within a Conservation Area).

Thank you for consulting The Victorian Society about this application. We **object** to the proposals and would like to offer our comments.

We must remind your authority that, unless explicitly excluded in the text of the list description under the amendments to the Planning (Listed Buildings and Conservation Areas) Act, 1990, s.1 5A a) and b), the interiors of a listed building are afforded the same protection as the exteriors. These proposals involve the total destruction of the interior of a listed church. The harm is both material and spatial: all the interior fixtures and fittings are to be removed, and the principal open space of the interior is to be heavily subdivided. Although the exterior is to be preserved mostly intact, we consider that this total loss of the historic interior will result in **substantial harm** to the significance of the building, and advise your authority to apply national policy accordingly.

The NPPF states at paragraph 195:

195. 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.

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1 Priory Gardens, London W4 1TT
Telephone 020 8994 1019
admin@victoriansociety.org.uk
victoriansociety.org.uk

The application documents include no evidence that any of these tests have been conclusively met, and we strongly advise your authority to refuse consent on this basis.

Although we consider the substantial harm that the current proposals will cause to be a compelling reason for the refusal of consent, we must point out that the application is unacceptable in other respects. Whereas the total loss of the interior will clearly cause substantial harm it is possible that revised, less drastic proposals for the alteration and adaption of the existing interiors might be acceptable. If such revisions are to be submitted a nuanced understanding of the significance of the interiors will be vital for a balancing judgment to be made. Such an understanding will only be possible if a thorough assessment of significance is provided, in line with the requirements of the NPPF, paragraph 189. The current application entirely fails to meet these requirements, providing very scanty information about the interior and only a few photographs. We recommend that a thorough survey of the interior is undertaken by a heritage professional in order to assess the significance of the interior fittings in detail.

We should also note that the current proposals will cause further harm to the significance of the church through alterations to its setting. The building stands on a small but prominent rise overlooking Longwood Brook, with a rose garden running down to the retaining wall. This garden is an important part of the church's setting and contributes to its significance by keeping it separate from the nearby former mills and other surrounding industrial buildings, and by visually anchoring it in the wider landscape, especially in views from the south. The proposals are to retain the open space, but to convert it to parking. This change in landscape from soft to hard will compromise the character of the church, eroding its distinction from the surrounding elements of the built environment and introducing a jarring, suburban tone. These changes should be avoided.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

Tom Taylor

Conservation Adviser