APPENDIX 1 – Listed Building References

General Location

- Statutory Address: CHURCH OF HOLY INNOCENTS, VICARAGE ROAD, WF12 9PD
- District: Kirklees (Metropolitan Authority)
- Parish: Non Civil Parish
- National Grid Reference: SE 24176 20320

Church Building

Official List Entry

- Heritage Category: Listed Building
- Grade: II
- List Entry Number: 1300421
- Date first listed: 03-Jul-1985
- List Entry Name: CHURCH OF HOLY INNOCENTS
- Statutory Address: CHURCH OF HOLY INNOCENTS, VICARAGE ROAD
- Listing NGR: SE2417620320
- Weblink:https://historicengland.org.uk/listing/the-list/list-entry/1300424?section=official-list-entry

Details

- 2/93 Church of Holy Innocents (G.V. II)
- Large Gothic Revival church in Decorated style. 1858 by Mallinson and Healy. Rock-faced stone with ashlar dressings. Pitched slate roofs. 5-bay nave with buttressed, lean-to north and south aisles. South porch. 3-bay chancel with vestry on south side. Square west tower with broach spire. Tower is of 3 tiers with angle buttresses. Paired 2-light bell-chamber openings. The parapet is pierced with trefoils and has large octagonal pinnacles, and gargoyles. The spire has lucarnes and smaller ones higher up. The west window is of three lights with two trefoils and one cinquefoil in head. The south porch has elaborate moulded surround with filleted colonnettes and good foliage capitals and drop tracery. 2-light clerestory windows with simple tracery. North and south aisles have 3-light windows with Decorated tracery. 2-light chancel windows with traceried heads. 5-light east window with two cinquefoils and one large circle in head.
- Interior: 5-bay arcade to north and south on quatrefoil filleted piers with plain capitals. Chancel arch on similar responds. Arched braced hammer beam roof on colonnettes and corbels. Very elaborate stone pulpit, and font, the latter with good, carved, tall, cover with pinnacles.

Gates

Official List Entry

- Heritage Category: Listed Building
- Grade: II
- List Entry Number: 1313648
- Date first listed: 03-Jul-1985
- List Entry Name: GATE AND GATEPIERS TO CHURCH OF HOLY INNOCENTS
- National Grid: SE 24178 20294
- Weblink: GATE AND GATEPIERS TO CHURCH OF HOLY INNOCENTS, Non Civil Parish - 1313648 | Historic England

Details

- Gate and 2/94 Gate piers to Church of Holy Innocents (G.V. II)
- Pair of gate piers. Circa 1858. Ashlar, reducing square piers with weathered off-sets and steeply gabled caps. Included for group value only.

Sundial

Official List Entry

- Heritage Category: Listed Building
- Grade: II
- List Entry Number: 1300424
- Date first listed: 03-Jul-1985

- List Entry Name: SUNDIAL 7 YARDS TO SOUTH OF CHURCH OF HOLY INNOCENTS
- National grid reference SE 24185 20314
- Weblink: SUNDIAL 7 YARDS TO SOUTH OF CHURCH OF HOLY INNOCENTS, Non Civil Parish - 1300424 | Historic England

Details

- 2/95 Sundial 7 yards to south of Church of Holy Innocents (G.V. II)
- Sundial. Circa 1858. Ashlar. Octagonal base on octagonal slab. Quatrefoil filleted column with foliage capital. Bronze circular plate and long gnomon.

There is also a listed building reference relating to the pair of gatepost to the Vicarage building on the opposite side of the road. These are not part of this application and will not be touched but are of relevance to the setting. Listed building details below;

Gates to Thornhill Lees Vicarage

Official list entry

- Heritage Category: Listed Building
- Grade: II
- List Entry Number: 1183833
- Date first listed: 03-Jul-1985
- List Entry Name: GATES AND GATE PIERS TO THORNHILL LEES VICARAGE
- Statutory Address: GATES AND GATE PIERS TO THORNHILL LEES VICARAGE, VICARAGE ROAD
- National Grid: SE 24172 20283
- Weblink: GATES AND GATE PIERS TO THORNHILL LEES VICARAGE, Non Civil Parish - 1183833 | Historic England

Details

- DEWSBURY CB VICARAGE ROAD SE 22 SW (Thornhill Lees) 2/97 Gate and Gate piers to Thornhill Lees Vicarage
- Pair of gate piers. Circa 1858. Ashlar, reducing square piers with weathered off-sets and steeply gabled caps. Included for group value only.

APPENDIX 2 – Letter from the Church Commissioners for England.

Thornhill Lees Background

The rationale for the closure of Thornhill Lees church was:-

The small and ageing congregation of Holy Innocents, Thornhill Lees, had declined in numbers and had been struggling for some years with the upkeep of a large church with serious maintenance needs. Demographic change in the area meant that a significant number of local residents were now members of a different faith. The Parochial Church Council (PCC) was unable to meet its financial obligations and considered that it was no longer feasible for the congregation to continue to sustain the church building.

The formal closure of the church of Holy Innocents, Thornhill Lees, for regular public worship, was therefore proposed.

Legal process

The process of closing a consecrated Anglican church building for regular public worship is governed by a piece of ecclesiastical legislation called the Misson and Pastoral Measure 2011. Church of England Measures have the same force in law as acts of Parliament.

Consultation on the formal closure started on 1 August 2018 and the church was formally closed on 1 October 2019. However, discussions had been on-going for a number of years. There had been a previous scheme started following a PCC vote to pursue closure on 15 September 2010. This first scheme was withdrawn on 27 September 2012 following concerns about the future ownership of the large open churchyard. The PCC and congregation carried on between 2012 and 2018 but there were issues with ongoing maintenance and repairs and falling numbers of attendees. Eventually the decision was made to pursue closure again in 2018.

Consultation took place with the usual “interested parties”, this phrase has a legal definition under the Measure and includes the Archdeacon, Area Dean, Deanery Synod Lay Chair, PCCs of both Thornhill Lees and Ravensthorpe, and Local Authority Planning Department (to note that the patron is the Bishop of Leeds so he was not consulted separately).They all received a copy of the draft proposals and a covering letter on 1 August 2018 to which they all responded to support the closure.

This local process of consultation is followed by a statutory period of public consultation undertaken by the Church Commissioners, who are the national church institution responsible for overseeing the process. The “interested parties” were consulted again when a formal draft closure scheme was published on 24 April 2019. This second consultation was also open to the general public and advertised in a similar to way in which local authorities publicise planning applications. No representations were received against the draft closure scheme, nor did anyone come forward with a proposal for an alternative community use for the building.

Following closure the building was placed on the open market. A further period of statutory public consultation will be required in order to appropriate the building (and part of the churchyard) to a new use.

Further information on these processes can be found here www.ccpastoral.org

Closed Churches Division
Church Commissioners for England

Church Commissioners for England are a registered charity (number 1140097)

Kirklees Council
Planning and Development Service
PO Box 1720
Huddersfield

Enquiries to: Edward Cheseldine

Kirklees Direct
Tel: 01484 414746
Email: Edward.Cheseldine@Kirklees.gov.uk

Richard Jones
The Studio, Flockton Chapel
Flockton
Huddersfield
WF4 4DP

Date: 19-Nov-2024
Our Ref: 2024/20259

Dear Mr Jones,

Pre-application advice for residential development at Church of the Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD.

I refer to your enquiry received 01 March 2024 concerning the above residential development.

1. **Summary of your proposal:**

Pre-application advice is sought for development at Church of the Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD.

This pre-application enquiry is for the alteration of the church, to be converted into 2 dwellings, formation of a car park and other associated internal & external works.

A pre application information pack has been received which contains the following;

- Planning statement
- Elevation plans
- Floor plans
- Block plans
- Arboricultural Assessment
- Heritage/Conservation Assessment
- Ecology Impact Assessment
- Biodiversity Habitat Assessment/Metric
- Climate Change Statement

A desk-based assessment has been undertaken alongside a site visit.

2. The Site:

Church of the Holy Innocents is a gothic revival church, designed by architects Mallinson and Healy. It was constructed in 1858/9 and was paid for by the Wormald and Cook families of Dewsbury Mill. The church is a significant grade II listed building with a broach spire, stone pulpit and listed gate piers amongst other special architectural features.

There is a cemetery within the curtilage of the site with access paths running through the churchyard.

There are several protected trees on site.

The application site is allocated as Urban Green Space and part of the Kirklees Wildlife Habitat Network designated under the Kirklees Local Plan.

3. **Relevant Planning History:**

2023/92128 – Listed building consent for alterations to convert church to 2 dwellings, formation of resident's car park, external amenity spaces and associated works – Refused for the following reason:

The applicant has failed to demonstrate that the proposed works are wholly necessary, nor is it demonstrated that public benefits exist which outweigh the less than substantial harm caused to the listed building through the subdivision of the church nave and external alterations. As such, the proposal fails to comply with paragraph 202 of the National Planning Policy Framework which requires less than substantial harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. It has not been evidenced that the special architectural and historical interest which the building possesses will be preserved as required by Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act and Policy LP35 of the Kirklees Local Plan.

2023/92127 – Alterations to convert church to 2 dwellings, formation of residents car park, external amenity spaces and associated works (Listed Building) – Refused fort he following reasons:

1. The applicant has failed to demonstrate that the proposed works would not have a harmful impact on the listed building and has not demonstrated public benefits which outweigh the harm caused by the internal and external alterations of the listed building including but not exclusively, the subdivision of the nave, formation of a car park and felling of mature trees. The proposals do not meet the requirements of Paragraph 202 of the National Planning Policy Framework, which requires less than substantial harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. This is also contrary to the general thrust of Policy LP35 of the Kirklees Local Plan insofar as this requires development proposals to preserve or enhance the significance of designated heritage assets; which this proposals does not. The internal and external alterations will not preserve the building or features of architectural and historic interest which it possesses, as required by Section 16(2) of the Planning Listed Building and Conservation Area) Act 1990.

DEVELOPERS RESPONSE – Refer to DAS & Viability Report for justification and measures taken to address the councils concerns.

2. The applicant has failed to demonstrate the appropriateness of the development when considering the change of use and external alterations to the church grounds which would result in the loss of urban green space and contrary to policies LP1, LP2, LP21, LP22, LP24, LP30, LP33, LP35, LP48, LP61 of the Kirklees Local Plan. To allow the development would have a significant impact on land designated as urban greenspace in the Kirklees Local Plan for which no assessment or replacement has been demonstrated resulting in a negative impact to the character of the listed church and wider area contrary to Policy LP61 of the Kirklees Local Plan and the National Planning Policy Framework.

3. The development proposed would result in a detrimental impact on ecology and protected trees for which no supporting information has been submitted. The development does not include mitigation strategies for the loss of designated urban green space, biodiversity net gain or tree replacements resulting in an unacceptable loss to protected trees as well as biodiversity contrary to Policies LP61, LP30 and LP33 of the Kirklees Local Plan and National Planning Policy Framework.

DEVELOPERS RESPONSE – Refer to DAS for general design approach and Appendix 8 for compenatory measures outlined within Ecological Impact Assessment.

4. **Land allocation and relevant planning policies:**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for Kirklees is the Local Plan (adopted 27th February 2019).

Land Allocation

The site is within designated the Urban Green Space and with the Wildlife Habitat Network on the Kirklees Local Plan Proposals Map.

Relevant Planning Policies

Kirklees Local Plan policies and National Planning Policy Framework policies considered relevant to the proposal are as follows:

Kirklees Local Plan Policies:

- LP 1 – Presumption in favour of sustainable development
- LP 2 – Place shaping
- LP 7 – Efficient and Effective Use of Land and Buildings
- LP 21– Highway safety
- LP 22 – Parking
- LP 24 – Design
- LP 30 – Biodiversity and geodiversity
- LP 31 – Strategic Green Infrastructure Network
- LP 33 – Trees
- LP 35 – Historic Environment
- LP 48 – Community facilities and services
- LP 52 – Protection and Improvement of Environmental Quality
- LP 61 – Urban Green Space

National Planning Policy Framework:

- Chapter 2 – Achieving Sustainable Development
- Chapter 12 – Achieving Well Designed and Beautiful Places
- Chapter 14 – Meeting the Challenge of Climate Change, Coastal Change and Flooding
- Chapter 15 – Conserving and Enhancing the Natural Environment
- Chapter 16 –Conserving and Enhancing the Historic Environment

Other material planning considerations:

- Kirklees Highways Design Supplementary Planning Document
- Kirklees Housebuilders Design Supplementary Planning Document
- Kirklees Open Spaces Supplementary Planning Document
- Government Guidance Biodiversity Net Gain Technical Advice Note
- Planning (Listed Buildings and Conservation Areas) Act 1990

5. Consultations

KC Conservation & Design – See *Historic Environment* section of the report.

KC Ecology – Advice provided in relation to Biodiversity Ney Gain (BNG), notable and protected species and the wildlife habitat network.

KC Environmental Health – Advice provided in relation to Air Quality, Contaminated Land, Noise, Electric Vehicle Charging Points (EVCPs), External Artificial Lighting, Odours, Foul Drainage, Private Water Supply.

KC Highways – See *Highway Safety* section of the report.

KC Trees – *See Trees* section of the report.

KC Policy – Advice provided in relation to Urban Green Space and Loss of a Community Facility.

6. Relevant matters for consideration

The following matters are considered in the assessment below:

1. Principle of Development
    a) Sustainable Development
    b) Land Allocation
    c) Urban Green Space
    d) Access and Public Perception
    e) Wildlife Habitat Network
    f) Historic Environment
    g) Loss of a Community Facility
    h) Viability
    i) Change to Residential Use
    j) Historic Environment
2. Impact on Visual Amenity
3. Impact on Residential amenity
4. Impact on highways
5. Environmental matters
6. Conclusions

6.1 Principle of development

Sustainable Development

NPPF Paragraph 11 and LP1 outline a presumption in favour of sustainable development. Paragraph 8 of the NPPF draws on the objectives of sustainable development being economic, social and environmental as the central pillars as well as multiple facets of achieving sustainable development within the decision-making process.

The dimensions of sustainable development will be considered throughout the proposal. Paragraph 11 concludes that the presumption in favour of sustainable development does not apply where specific policies in the NPPF indicate development should be restricted. This too will be explored within the dimensions of the proposal.

DEVELOPERS RESPONSE – Refer to Viability Report for justification in full.

Land Allocation

Policy LP2, Place Shaping - draws on the strengths of the character existing within sites to enhance the positive features of the places that make up Kirklees.

All development proposals should seek to build on the strengths, opportunities and help address challenges identified in the Local Plan, in order to protect and enhance the qualities which contribute to the character of these places.

The site has been identified on the Local Plan Policies Map, set out in the Kirklees Local Plan as Urban Green Space. As well as the land allocations within the local plan, contributing assets to the character of the site such as protected trees, architecture of the listed church and features within the site will contribute to the visual strengths application.

Urban Green Space

The development as outlined is considered a departure of designated Urban Green Space (UGS) due to the construction of a car park and formation of private gardens. Policy LP61 states; Development proposals which would result in the loss of urban green space (as identified on the Policies Map) will only be permitted where:

a. *an assessment shows the open space is clearly no longer required to meet local needs for open space, sport or recreational facilities and does not make an important contribution in terms of visual amenity, landscape or biodiversity value; or*
b. replacement open space, sport or recreation facilities which are equivalent or better in size and quality are provided elsewhere within an easily accessible location for existing and potential new users; or
c. the proposal is for an alternative open space, sport or recreation use that is needed to help address identified deficiencies and clearly outweighs the loss of the existing green space.

Regarding point a, an assessment identifying the use of the open space has not been submitted. Parking rests in an area that is separated by the rest of the site by a low wall, it contains protected trees. Officers note there are some recent gravestones adjacent to the parking area. It should be illustrated that the car park would not conflict with the observation of gravestones adjacent to this area. In terms of visual amenity, the area includes mature trees. The indicative car park plan suggests 7 parking spaces would be provided which is calculated from the number of bedrooms provided. The harmful impact to UGS is intrinsically linked to the number of parking spaces. Whilst

the number of parking spaces is suitable in terms of highways, the loss Urban Green Space could be reduced if the size of the parking area is scaled down. In turn, this would reduce the harm to the significance of the listed building and the impact to highway safety (*see further sections)*.

The area identified as garden space appears to be a buffer space between the pathway and church, which should be confirmed. For the purposes of LP61, the contribution of this area in terms of public use, biodiversity and visual amenity is limited.

Notwithstanding harm beyond the loss of Urban Green Space, the change of use could be acceptable so long as it is evidenced that the car park does not interfere with the public's use of the cemetery and the harm to the urban green space is minimised.

DEVELOPERS RESPONSE – Refer to Viability Report (car parking) for justification and drawing 22-111/A19 for grave positions around the parking area.

Point b, relates to replacing UGS. It is acknowledged replacement space would not be suitable, as the land is inherently related with the cemetery and visual amenity of the site. However, land within boundary of the church could be improved for the enjoyment of the public which would hold material weight in terms of complying with LP61.

DEVELOPERS RESPONSE – Refer to Design & Access Statement (BIODIVERSITY NET GAIN) for justification.

Point c is not relevant in this case.

Access and Public Perception of Green Spaces

Within LP61, paragraph 19.46 states, *'Some open spaces in Kirklees have been designated as urban green space for purposes other than sport and recreation and may not have public access. These include urban green spaces important for their visual amenity, landscape and biodiversity benefits which close to where people live can help promote the health and well-being of local residents and contribute significantly to the quality and local character of the built-up areas in Kirklees. In order to safeguard these sites, development proposals will not be permitted which would be harmful to these qualities or the function of the urban green space.*

Free and open access to the church grounds is necessary to support the community use of the cemetery and for the observation of the heritage asset. Public access is currently provided by iron gates leading from Vicarage Road. Block plans indicate the entrance would be altered to allow for vehicles to enter the site. This would remove the current public access arrangements, forming a private entrance for vehicles. Indicative plans suggest the pedestrian access would not be replaced. A pedestrian friendly entrance should be formed to link the public footpath with the remaining open space to support LP61.

DEVELOPERS RESPONSE – Refer to proposed site plan drawing (22-111/A12) for justification.

Strategic Green Network

The site rests within the Kirklees Wildlife Habitat Network. Given the habitat removal and the level of development, it is not considered the indicative proposal will be contrary to the purposes of the

biodiversity and ecological network, notwithstanding details relating to ecology which will be assessed separately.

Loss of a Community Facility

Church of the Holy Innocents is considered a community facility under Local Plan Policy LP48.

Proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:

a. there is no longer a need for the facility and all options including the scope for alternative community uses have been considered; or
b. its current use is no longer viable; or
c. there is adequate alternative provision in the locality to serve the local community which is in an equally accessible location; or
d. an alternative facility of equivalent or better standard will be provided, either on-site or equally accessible; and
e. any assets listed on a Community Asset Register have satisfied the requirements under the relevant legislation.

Appendix 2 relates to a letter from the Church Commissioner, it includes a statement on the sustainability of the function church and the legal process of the church closure. Further information was requested in terms of the viability and marketing of the church for viability in relation to the historic environment.

For the purposes of LP48, details displayed in Appendix 2 are suitable in meeting criterion b). The LPA would welcome a community centred alternative use or part use, however for the purposes of LP48, Appendix 2 is acceptable.

DEVELOPERS RESPONSE – Refer to Viability Report for justification in full.

Change to Residential Use

'The 2023 update of the five-year housing land supply position for Kirklees shows 3.96 years supply of housing land, and the 2022 Housing Delivery Test (HDT) measurement which was published on 19th December 2023 demonstrated that Kirklees had achieved a 67% measurement against the required level of housing delivery over a rolling 3-year period (against a pass threshold of 75%).

As the Council is currently unable to demonstrate a five-year supply of deliverable housing sites, and delivery of housing has fallen below the 75% HDT requirement, it is necessary to consider planning applications for housing development in the context of NPPF paragraph 11 which triggers a presumption in favour of sustainable development. This means that for decision making "Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of-date (NPPF Footnote 8), granting permission unless: (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (NPPF Footnote 7) ; or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

The Council's inability to demonstrate a five-year supply of housing land, or pass the Housing Delivery Test, weighs in favour of housing development but this has to be balanced against any adverse impacts of granting the proposal. The judgement in this case is set out in the officers assessment.

In this case, two additional units would make a small contribution to that supply. Good design is a key aspect of sustainable development which contributes to creating better places. Therefore, a balance is formed, within this assessment, against the benefits 2 dwellings would bring.

Historic Environment

Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires, that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 (1) requires that with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

In terms of the impact to the listed building, works include the subdivision of the church. Internal walls require fixings and alter the spatial confinements of the historic church. The building would be separated into three floors with subdivided rooms. In terms of harm to the building, the number of subdivisions is intrinsic to the harm caused. It is considered that the number of rooms could be reduced therefore reducing the amount of harm to the historic asset. KC Conservation & Design also raised an objection to the number of roof lights installed, in terms of removing historic fabric of the building, which Officers agree with. It is recognised that the stained-glass windows may not support light levels to provide suitable amenity, however the superfluous skylights would not be likely considered acceptable and should be reduced.

DEVELOPERS RESPONSE – the floor area of proposed development has been reduced as has the rooflights. Refer to Design & Access Statement & drawings for more information.

External alterations would include the formation of parking spaces by removing mature trees. The trees are intrinsic to the setting of the listed building and its curtilage, therefore, there is harm to its setting. In addition, Officers believe that the land adjacent to Vicarage Road should be protected, as it represents the most public aspect of the Grade II listed church. It should be demonstrated that alternative parking arrangements have been considered so Officers can balance the harm of the car park with potential parking alternatives. This could also mitigate concern raise in relation to Urban Green Space and Highway Safety.

DEVELOPERS RESPONSE – Refer to Viability Report (car parking) & Design & Access Statement (BIODIVERSITY NET GAIN) for justification.

The church spire will require a maintenance plan due to the nature of the structure. It may be required that a legal agreement is undertaken to ensure the structure of the church is suitable cared for.

DEVELOPERS RESPONSE – Refer to Design & Access Statement for plan.

Paragraph 205 of the NPPF states that:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."

Paragraph 207 goes on to state that:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

Given the indicative plans, the level of harm to the listed building and its setting is considered to be, in this case, greater than the public benefits of introducing two private dwellings when considering paragraph 205 & 207 of the NPPF.

DEVELOPERS RESPONSE – Refer to Viability Report (conclusion) for justification.

Conclusion

If a full application is received the following should be submitted:

- Cemetery plan for gravestones adjacent to development - *refer to site plan drawing (22-111/A12)*
- Formation of a public entrance and details of public access to the graveyard - *refer to site plan drawing (22-111/A12)*
- Amended car park plans, and/or justification of the suitability of the car park including alternatives – *Design & Access Statement*
- Management plan for maintenance of the spire – *Design & Access Statement*
- Information relating to marketing / continued use of the building as a church in light of requirements of policy LP48 - *Viability Report*
- Information in relation to loss of urban green space in light of requirements of policy LP61 - *Design & Access Statement (Appendix 8 & 9)*
- Reduction in the number of roof lights. – *refer to roof plan (22-111/A14)*

Whilst the proposal may be potentially acceptable, this is weighed against the number of constraints which are present at the site and the need for these to be satisfactorily addressed. It is recommended the advice / details listed above are considered and submitted should an application be forthcoming.

<u>Impact on Visual Amenity</u>

The NPPF offers guidance relating to design in Chapter 12 (achieving well designed places and beautiful places) whereby paragraph 131 provides a principal consideration concerning design which states:

"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

Kirklees Local Plan policies LP1, LP2 and significantly LP24 all also seek to achieve good quality, visually attractive, sustainable design to correspond with the scale of development in the local area, thus retaining a sense of local identity.

LP24 states that proposals should promote good design by ensuring:

"a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape…"

Alterations to the external building and the site include the formation of the car park, soft landscaping and alterations to the boundary. Hard landscaping materials have not been submitted within the pre-application information.
DEVELOPERS RESPONSE – Refer to proposed site plan drawing (22-111/A12) and also comment below

In terms of visual alterations, notwithstanding the impact to trees, the comments formed in relation to the impact of parking on the setting of the listed building should be adhered to in terms of complying with LP24. In addition, the hard landscaping of this area should be designed using considerate materials that would contribute to the setting of the church considering the car park would be visible to the public.

Soft landscaping will be introduced to screen the private gardens for the dwellings. A planting scheme that includes the type of shrubs and their management should be submitted in order to assess if the type of planting is suitable in terms of Policy LP24.
DEVELOPERS RESPONSE – soft& hard landscaping scheme can be conditioned and submitted once the scheme is approved.

6.3 Residential amenity

Section B and C of LP24 states that alterations to existing buildings should:

"…maintain appropriate distances between buildings' and *'…minimise impact on residential amenity of future and neighbouring occupiers."*

Further to this, Paragraph 135 of the National Planning Policy Framework states that planning decisions should ensure that developments have a high standard of amenity for existing and future users.

The proposed development is considered to be a sufficient distance away from any other neighbouring properties not referred to so as to prevent undue harm in terms of loss of light, loss of outlook, overlooking or loss of privacy, or the creation of an overbearing effect. Of note, whilst there are a number of properties to the east of the site, the proposed residential dwellings would be over ~21 metres from the rear elevation window to the east boundary of the site, this being 18, 20, 22 & 24 Selbourne Road.

Amenity of Future Occupiers

Policy LP24 b) of the LP which requires proposals to provide a high standard of amenity for future occupiers.

Principle 16 of the Housebuilders Design Guide SPD states that: *"All new build dwellings should have sufficient internal floor space to meet basic lifestyle needs and provide high standards of amenity for future occupiers. Although the government has set out Nationally Described Space Standards, these are not currently adopted in the Kirklees Local Plan."*

Guidance as to the suitable standards for internal space are set out in the House Design Guide SPD, which states in paragraph 9.1, 'The Council recognises the nationally described space standards (NDSS) as best practice to ensure that new homes are able to meet basic lifestyle needs and provide high standards of amenity for future occupiers'.

The floorplans indicate each dwelling would have four bedrooms over three floors. NDSS guidance states such a dwelling should have an internal floors space of 103m2 with a bedroom size of at least 11.50m2, which the plans accord with.

It is considered that the property would be sufficient in terms of natural light, due to the amount and size of the windows which would be satisfy criteria in relation to amenity for future occupiers.

Principle 17 of the Kirklees Housebuilders Design Guide SPD outlines that: *"All new houses should have adequate access to private outdoor space that is functional and proportionate to the size of the dwelling and the character and context of the site. The provision of outdoor space should be considered in the context of the site layout and seek to maximise direct sunlight received in outdoor spaces."*

Dwelling 1 would have an outdoor residential area of ~110m2, dwelling 2 would have an outdoor residential area of ~87m2. Given the limitations of the site, the residential gardens would be considered to be a good size whilst reduced the impact to the surrounding site.

The proposed change of use is therefore considered to accord with Principle 16 of the Kirklees Housebuilders Design Guide SPD in terms of internal floor space, Local Plan Policy LP24(b) and Chapter 12 of the National Planning Policy Framework.

6.4 Impact on Highway Safety

Plans should accord with Policy LP21 & LP22 of the Kirklees Local Plan as well as guidance set out in the Kirklees Highways Design Guide SPD.

The plans were assessed by KC Highways.

In terms of parking, Key Design Driver 20 of the Kirklees Highways Design Guide SPD states a 4+ bedroom dwelling should have three off-street parking spaces. In terms of accommodating this, the plans indicate 7 spaces will be provided for the two dwellings, which would provide parking for the occupants with 1 guest space.

Swept path analysis plans have not been provided, however KC Highways raised concern that vehicles in the eastern bays would not be able to manoeuvre within the car park and would have to

exit the site in a reverse gear. Officers would consider the current parking arrangements are not suitable for the number of spaces proposed. Vicarage Street is a busy road due to Headfield C of E School. Exiting the site in a reverse gear would be detrimental to the safety of Vicarage Road. In line with comments in relation to the Urban Green Space and the historic environment, the parking layout should be amended in order to allow vehicles to manoeuvre.

KC Highways also raised concerns to the safety of pedestrians as there is no separate pathway for pedestrian. The cemetery will still be used by the public, therefore, there is a concern to the safety of the public and the occupants of the site.

A bin storage area should be detailed similarly a collection area, that is close to the public highway should also be indicated on any future plans.
DEVELOPERS RESPONSE – Refer to proposed site plan drawing (22-111/A12) and DAS sections 'External Works' & 'Parking Analysis' for explanation.

Environmental Matters

Trees

The proposal as it stands requires the removal of 4 category B trees in order to facilitate the parking area. KC Trees have assessed the submitted information, they have noted Appendix A: Tree Constraints & Arboricultural Impact Plan does not appear to be within the case file.
DEVELOPERS RESPONSE – Refer to Design & Access Statement (Appendix 4) for plan.

Category B would typically be desirable to be retained. From a tree perspective the AIA submitted has made a fair assessment. However, trees disagree with the comments in section 7.8 Potential Tree Planting Locations. In KC trees experience, replanting trees in graveyards is often difficult because graves may not always be accurate and excavation to plant a tree risk can disturb remains. KC trees have concerns about the potential of replacement planting at the site.

From a tree's perspective, reducing the number of dwellings, reducing the number of car parking spaces needed, will by default reduce the impact on the existing trees to facilitate the need/number of replacement planting.

In terms of Policy LP33 and LP24(i), the removal of category B trees could be acceptable so long as there is sufficient justification that the car park should be sited in its current position and the harm to trees is minimised.
DEVELOPERS RESPONSE – Refer to Viability Report for justification.

Biodiversity Net Gain

Paragraphs 180, 186, 187 and 188 of Chapter 15 of the National Planning Policy Framework are relevant, together with The Conservation of Habitats and Species Regulations 2017 which protect, by law, the habitat and animals of certain species including newts, bats and badgers. Policy LP30 of the Kirklees Local Plan requires that proposals protect Habitats and Species of Principal Importance.

Furthermore, Biodiversity Net Gain (BNG) came into effect for minor sites on 02 April 2024 unless the development is exempt from this requirement (detailed here). There is a requirement to replace the loss of a habitat whilst delivering at least 10% biodiversity net gain.

More information regarding biodiversity net gain can be found on the government website at; https://www.gov.uk/guidance/biodiversity-net-gain#biodiversity-net-gain-submitting-a-planning-application

If a full application is submitted, a baseline assessment of the existing biodiversity habitats would be required, to attain the impact of the development on these habitats.

. It is within the capacity of the planning authority to assess if degradation to habitats has occurred prior to the submission of a full planning application and request an uplift for net gain if this has occurred.

If the application required a BNG uplift, the following should be submitted by a certified ecologist;

- The calculations of the pre-development biodiversity value of the onsite habitat on the date of application
- A statement whether activities have been carried out prior to the date of application
- The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- Plan(s), drawn to an identified scale showing onsite habitat existing on the date of application

The submission of a pre-application would not exempt a future planning application from BNG legislation.

In any event the scheme will be required to provide biodiversity enhancements, such as a Schwegler bird box and a bat box, as required by Policy LP30 of the Local Plan.
DEVELOPERS RESPONSE – Refer to Design & Access Statement (BIODIVERSITY NET GAIN) & appendix 8.

Ecology

The EcIA details that further surveys are required to determine the protected species use of the site. Further bat survey, to include a hibernation survey visit and a programme of three nocturnal surveys is required to enable confident assessment of potential impacts and inform the need for licensing and/or mitigation/compensation measures.
This information should be submitted with the full application, with mitigation measures to ensure there are no impacts to protected species as part of the proposals.
DEVELOPERS RESPONSE – Refer to Design & Access Statement (BIODIVERSITY NET GAIN) & appendix 8.

Burial Ground

KC Environmental Health have reviewed the submitted plans. A graveyard exists within the curtilage of the proposed site, moreover they have concerns that the proposed building may cover graves at this site. In any future application, it is unlikely they would be able to support the application without full identification of the burial plot on the plans and details of how the burial plots are to be protected moving forward. The Environment Agency are a statutory consultee for

development relating to the use of land as a cemetery, who will be consulted if a full application for planning permission is sought.

Contamination Land

KC Environmental Heath have reviewed the submitted information.

Policy LP53 of the Kirklees Local Plan and paragraphs 174 and 183 of the National Planning Policy Framework are relevant. This site has been identified as potentially being subject to contamination

'The proposed development site is potentially contaminated from its former use as a graveyard. Therefore, contaminated land issues need to be considered. We would therefore expect a current Phase 1 Contaminated Land Report (Desk top study and site walkover) to be included with any future application for this development. If the agreed Phase 1 report has identified potential contaminated land risks, then a Phase 2 Intrusive Survey Report and if necessary, a Remediation Strategy report will be required for approval before any ground works commence. If ground gas monitoring is necessary as part of the Phase 2 investigation the Phase 2 Report will not be considered acceptable unless the whole of the gas monitoring as been completed in accordance with current guidance. A report detailing only part of the gas monitoring will not be acceptable. We would require the developer to demonstrate that any contamination at the site has been remediated to a satisfactory standard before the new use commences. A verification report by a competent person would be required.
All contamination reports shall be prepared in accordance with guidance in:

- *Land Contamination Risk Management (LCRM)*
- *BS 10175:2011+ A2:2017 Investigation of Potentially Contaminated Sites. Code of Practice*
- *Development on Land Affected by Contamination - Technical Guidance for Developers, Landowners & Consultants - (v11.2) June 2020 by the Yorkshire and Lincolnshire Pollution Advisory Group.'*

On the basis of the response of the Environmental Health Team, it is considered that land quality is a matter which, whilst requiring attention, can be suitably addressed.
DEVELOPERS RESPONSE – Contaminted land can be conditioned and submitted once the scheme is approved.

Noise

Policy LP52 is considered to be of relevance and sets out that development must be considered in relation to potential for increases from pollution, in this case the relevant possible increases could relate to noise, light & odour emissions.

KC Environmental Heath have reviewed the submitted information.

The proposed development is near to an existing busy highway, noise from which is likely to have an impact on future occupiers of the site. They will therefore expect a noise impact assessment to be provided with any future application. The assessment should determine the existing noise climate taking all likely noise sources into consideration and then detail how this will affect the proposed development. It should also detail any noise mitigation measures that will be required so that satisfactory sound levels will be achieved both indoors and at any outdoor amenity areas at the

development. If windows need to be kept closed to achieve satisfactory indoor sound levels, then the mitigation measures will also need to include specific details of the alternative ventilation that will be provided as a substitute to opening windows.

All noise assessments should be carried out by a competent person. Developers may wish to contact the Association of Noise Consultants http://www.association-of-noiseconsultants.co.uk/ (020 8253 4518) or the Institute of Acoustics http://www.ioa.org.uk (0300 999 9675) for a list of members.

In the absence of a suitable noise assessment being submitted with any future application it is likely that Environmental Health would recommend a condition requiring this information.
DEVELOPERS RESPONSE – Noise Assessment can be conditioned and submitted once the scheme is approved.

River Calder

Given the proximity to the river Calder, the Canal and River Trust would be consulted if a full application is submitted.

6.6 Conclusion

It has been noted that the harm to the listed building could be reduced by altering the internal layout of the dwelling. This would in turn reduce the loss of public space, improve the visual amenity of the site and reduce the harm to trees. The following should also be submitted:

- Alterations to the internal floor layout
- Removal of some of the skylights
- Possible alternatives and justification for the position of the car park
- Options appraisal
- Viability assessment documentation
- Landscaping plans
- Cemetery plan
- Protected species survey as identified in the EcIA
- Noise assessment

Should an application be forthcoming it is recommended that the advice and recommendations set out in this letter be taken into consideration.

7. Validation requirements

The information you need to provide with your application is detailed on the Validation checklist. Please note the Validation Requirements for Submission of Planning Applications will be effective from 6th February 2023. Both these documents can be viewed under the heading 'Guidance and advice notes' on the Kirklees Planning and development website:

http://www.kirklees.gov.uk/beta/planning-and-development.aspx

8. Planning Application Fee

Kirklees Council
Planning and Development Service
PO Box 1720
Huddersfield

The following link will calculate the relevant planning fees
https://1app.planningportal.co.uk/FeeCalculator/Standalone?region=1/

I hope you find this information helpful.

Yours faithfully

Mathias Franklin

Disclaimer

Any views or opinions expressed are in good faith, without prejudice to the formal consideration of any planning application, which will be subject to public consultation (which will include the relevant Town or Parish Council) and ultimately be decided by the Council.

It should be noted that subsequent alterations to legislation or local, regional and national policies might affect the advice given. You should be aware of the Council's Local Development Scheme which sets out the programme for developing its local plan. You are advised to seek further advice once any consultation drafts are published.

Caution should be exercised in respect of pre-application advice which is not submitted within a short time of the Council's advice letter.

Aire Valley Tree Consultancy Ltd.

Pre-Development
Arboricultural Impact Assessment

Site:
Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD

Client:
SC1 Property Limited

Date:
23rd October 2023

AVTCL Ref: 1. Vicarage Rd Dewsbury. SC1Property.10-23

Summary

Planning consent is being sought for external works and car parking found Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD. Trees are found within and adjacent to the proposed development which could be influenced by it if not fully considered.

This report is compiled in accordance with British Standard 5837:2012 *Trees in relation to design, demolition and construction – Recommendations.*

Details for nine individual trees were recorded.

A Tree Constraints Plan included in Appendix A shows the current site and its recorded trees, their canopy spread, root protection areas and retention category.

An Arboricultural Impact Plan also included in Appendix A shows the current site trees and area of proposed development.

The footprint of the proposed car park, and the groundworks to enable that will require the removal of five trees (four category B trees and one category C tree). One further tree is recommended to be removed whether development goes ahead or not due to its irreversible decline/poor health and structural condition.

Retained trees will have to be protected from development related impacts through the use of temporary tree protective fencing and tree considerate construction methodologies. Arboricultural Method Statement heads of terms are included in section 8 below, which can be detailed further as part of a planning condition.

The area immediately adjacent the proposed car park does not have enough room to enable the establishment and full canopied growth of replacement trees. Some potential planting areas have been recommended and are provided in section 7.8 below. A full planting plan, specification and maintenance schedule can be produced as part of a planning condition.

It is considered the development can go ahead following recommendations in British Standard 5837 without significant detriment to retained trees.

Table of Contents

1. Introduction 4
1.1 Purpose of the Report 4
1.2 Terms of Reference 4
1.3 Method of Survey & Inspection 4
1.4 Qualifications and Experience 4
1.5 Trees Subject to Statutory Controls 4
2.0 Caveats and Limitations 6
2.1 Scope of Survey & Report 6
2.2 Change in Weather Conditions 6
2.3 Change of Soil Conditions 6
2.4 Investigative Method Limitations and Extent of Investigation 6
2.5 Force Majeure 6
2.6 Report Manipulation 6
2.7 Tree Ownership 6
3.0 Survey Details 7
3.1 Survey Details: 7
3.2 Tree Observations & Categorisation 7
3.3 Identification and Location of the Trees 7
4.0 Tree Appraisal 8
4.1 Number of Trees, Age Mix & Species Diversity 8
4.2 Tree Categorisation 8
4.3 Root Protection Area (RPA) Amendments 8
5.0 Tree Constraints 9
5.1 Above Ground Constraints – Tree Trunk and Canopy 9
5.2 Below Ground Constraints – Root Protection Area 9
5.3 Arboricultural Impact Plan 9
6.0 Arboricultural Impact Assessment 10
6.1 Development Proposal 10
6.2 Arboricultural Impact of the Development 10
6.3 Dead, Declining or Structurally Unsound Trees 10
6.4 Above Ground Tree Constraints – Tree Trunk and Canopy 10
6.5 Below Ground Tree Constraints – Root Protection Areas (RPA's) 10
6.6 Construction Access & Storage of Materials 10
6.7 Impact on Amenity 11
6.8 Proposed Planting to Mitigate for Tree Loss 11
6.9 Tree Species 11
6.10 Trees Protection Status 11
6.11 Indirect Damage Potential 11
6.12 Conclusions 11
7.0 Recommendations 12

7.1 Project Arboriculturist 12
7.2 Tree/Ground Protection – Generic Precautions 12
7.3 Tree Work Recommendations 12
7.4 Tree Work Standard - BS 3998:2010 12
7.5 Bird & Bat Activity 12
7.6 Tree Protective Fencing 13
7.7 Excavation within Retained Trees RPA's 15
7.8 Potential Tree Planting Locations 15
8.0 Arboricultural Method Statement 'Heads of Terms' 16
Appendix A: Tree Constraints & Arboricultural Impact Plan 17
Appendix B: Authors Qualifications & Experience – Ross Cannon 18
Appendix C: Tree Details & Site Photographs 19
Appendix D: Trees in Design & Planning Process – Extracts from BS 5837: 2012 22
Appendix E: Authors Signature & Declaration 23

1. Introduction

1.1 Purpose of the Report

Planning consent is being sought for external works and car parking found at Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD.Trees are found within and adjacent to the proposed development which could be influenced by it if not fully considered.

SC1 Property Limited provided Aire Valley Tree Consultancy Ltd with a plan showing on-site trees and highlighting the areas of the site which were proposed for development.

SC1 Property Limited instructed Aire Valley Tree Consultancy Ltd to undertake a pre-development tree survey to British Standard 5837:2012 *Trees in relation to design, demolition and construction – Recommendations*.

This report will include the following information:

1. Results from a tree survey, undertaken in accordance with *British Standard 5837:2012 Trees in relation to design, demolition and construction – Recommendations*
2. An appraisal of the trees located within the influencing distances and their possible constraints to the development
3. An Arboricultural Impact Assessment of the development and recommendations for tree retention, pruning and removal
4. Make recommendations to ensure the health and longevity of retained trees, informing client, contractor and planners of the requirements to protect retained trees

1.2 Terms of Reference

Instructions were given by SC1 Property Limited to visit the site and prepare the findings in a report. The report should be read in conjunction with the Tree Constraints and Arboricultural Impact Plans located in Appendix A.

The following documents were provided by SC1 Property Limited:

- Current site and proposed site plan ref 22 111

1.3 Method of Survey & Inspection

The inspection of the trees was undertaken at ground level using visual assessment (VTA) of the trees canopy, stem and basal area, based on methodology devised by Mattheck (1998). The survey and report are compiled in accordance with British Standard 5837:2012 *Trees in relation to design, demolition and construction – Recommendations* (hereafter BS5837). Root Protection Areas (RPAs) are based upon equations taken from section 4.6 of BS5837.

1.4 Qualifications and Experience

This report is based on the author's site observations and the provided information. Conclusions have been made in light of his experience and qualifications. A list of the authors experience and qualifications in arboriculture are detailed in Appendix B. The client may choose to accept or disregard the recommendations made in this report or seek additional advice.

1.5 Trees Subject to Statutory Controls

Before authorising any works checks with the Local Planning Authority (LPA) should be completed. Statutory permission may be required before any work can take place. It is a criminal offence to cut down, top, lop, uproot, wilfully damage or destroy any tree covered by a Tree Preservation Order, within a Conservation Area or subject to planning conditions unless the LPA has specifically permitted the work. Roots have as much protection as branches.

A desktop check at https://www.kirklees.gov.uk/beta/trees-listing-and-conservation/tree-preservation-orders indicates the significant trees recorded in this report are the subject of a Tree Preservation Order but no checks with the LPA have been made at this time. Clients and contractors should consider this information as a snapshot in time and at the caveats of that web page. Clients and contractors should undertake their own checks prior to any works at their own risk.

2.0 Caveats and Limitations

2.1 Scope of Survey & Report

This report is concerned only with trees in relation to construction. This report makes no attempt to provide a full health and safety inspection of the trees surveyed. It should not be seen as an alternative for a tree hazard assessment which is specific to minimising the risk and liability associated with trees. Obviously hazardous trees will be highlighted and appropriate recommendations made only where seen and when urgent action is required in the interests of public safety.

Any observations made with regards to the condition of built structures are from a layperson's view. No assessment of the potential influence of trees, upon buildings or other structures resulting from the effects of trees upon shrinkable load-bearing soils has been made.

2.2 Change in Weather Conditions

The content of this report may become invalidated if a change of circumstance affecting the trees arises as a result of unusual weather conditions. Particularly, but not limited to extreme storms and high winds.

2.3 Change of Soil Conditions

Structural or chemical soil disruption around the trees may invalidate the findings in this report, especially where there is significant damage to the rooting area of the trees not following recommendations in BS5837 or National Joint Utilities Group Volume 4 (Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees.

2.4 Investigative Method Limitations and Extent of Investigation

The trees in question were surveyed using non-invasive methods. Recommendations regarding internal cavities and/or internal decay cannot be made from this report without further inspection. Chemical analysis of the soil was not undertaken. Comments made upon the structure of the tree are based upon inspection from ground level.

Many of the trees are found on the boundary of the site. Trees were only viewed from the roadside to the south and from within the site. This has limited the extent to which a full appraisal can be made. It is however considered adequate for the process of tree categorisation to inform the BS 5837 process.

2.5 Force Majeure

The contents of this report may become invalidated by any 'Force Majeure' such as significant natural or man-made disasters out of the control of any specific party.

2.6 Report Manipulation

The report is issued for the purposes of the instructing client in the form it is given and therefore no liability is accepted to any other party where reproduction, manipulation or reliance upon any incorrect representation of this report has been undertaken.

2.7 Tree Ownership

Work recommendations given do not override the need to establish ownership and if necessary, obtain permission where required.

3.0 Survey Details

3.1 Survey Details:

- A tree survey took place on 11 October 2023
- On the day of inspection, the weather conditions were wet, but with no visibility constraints
- Horizontal and vertical measurements were taken using a laser rangefinder. Estimations were made where access could not be gained or vegetation prevented accurate recordings
- Tree locations were plotted on the provided plans. Trees T1 & T8 however were plotted on site using triangulation from known points or offset measurements. I am not a land surveyor but consider their locations are accurate enough for the purpose of this report

3.2 Tree Observations & Categorisation

Trees were visually assessed, and all relevant information recorded on site. Trees were graded on their quality and remaining life expectancy. Section 4.5.2 of BS 5837 states *'The purpose of the tree categorisation method, which should be applied by an arboriculturist, is to identify the quality and value (in a non-fiscal sense) of the existing tree stock, allowing informed decisions to be made concerning which trees should be removed or retained in the event of development occurring'*.

There are four retention category's, U, A, B and C. The category colours as given below are represented on all maps and plans to aid removal/retention and site design.

- Category U – Trees in such **poor** condition that they cannot realistically be retained in the context of the current land use for greater than 10 years.
- Category A – Trees of **high** quality with an estimated life expectancy of at least 40 years.
- Category B – Trees of **moderate** quality with an estimated life expectancy of at least 20 years.
- Category C – Trees of **low** quality with an estimated life expectancy of at least 10 years, or young trees with a stem diameter of less than 150mm.

Category U trees are those that should be removed in the short term and should not be considered further in the planning process unless there is ecological/habitat value. All other category trees are material considerations in the planning process.

3.3 Identification and Location of the Trees

The report should be read in conjunction with the tree related plans in Appendix A.

4.0 Tree Appraisal

4.1 Number of Trees, Age Mix & Species Diversity

- Details were recorded for nine individual trees
- All trees were mature in age
- Species included Holly, Ash, Sycamore and Norway maple

4.2 Tree Categorisation

The breakdown of quantities for each category of tree recorded is shown below in Table 1

Table 1- Tree retention categories

Retention Category	Description	Quantity	%
A	High quality and value	0	0 %
B	Moderate quality and value	6	66 %
C	Low quality and value	2	22 %
U	Unsuitable for retention	1	11 %

4.3 Root Protection Area (RPA) Amendments

Section 4.6.2 of BS5837 states that '*the RPA should initially be plotted as a circle centred on the base of the stem. Where pre-existing site conditions or other factors indicate that rooting has occurred asymmetrically, a polygon or equivalent area should be produced. Modifications to the shape of the RPA should reflect a soundly based arboricultural assessment of likely root distribution.'*

The RPA of trees T1, T2, T3, T6 and T7 as plotted on the plans in Appendix 1 have been altered from a circle centred on the stem to semi-circle/polygons. This has been done as limited rooting potential is considered available to east beyond a retaining (different levels) wall or 1m under the highway to the south.

The m² area of the altered RPA's is accurate and follows recommendations in Annex D of BS5837.

5.0 Tree Constraints

5.1 Above Ground Constraints – Tree Trunk and Canopy

The trees current canopy spread is marked on plans to aid site design. Consideration needs to be made to the following:

- Mature height and spread
- Species characteristics such as evergreen or deciduous, honeydew (sap) drip, fruit fall
- Shade potential
- Potential incompatibilities between layout and trees proposed for retention
- Working/access space needed for construction phase
- Protection of tree canopies from machinery impact or scaffold clearance
- Infrastructure requirements- easements, lighting, solar collectors, CCTV

5.2 Below Ground Constraints – Root Protection Area

BS 5837 states a *'root protection area (RPA) is a layout design tool indicating the minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability, and where the protection of the roots and soil structure is treated as a priority'*.

For single stems the RPA is calculated as an area equivalent to a circle with a radius 12 times the stem diameter. The RPA is plotted on plans as a circle, but where pre-existing site conditions are considered to have altered the rooting area a polygon will be produced – see 4.3 above.

The default position is that proposed structures should be located outside the RPA's of retained trees. If operations are proposed within the RPA, the arboriculturist should:

- Demonstrate that the tree can remain viable and that the area lost to encroachment can be compensated for elsewhere, contiguous with its RPA
- Propose a series of mitigation measures to improve the soil environment that is used by the tree for growth

If utility operations within the RPA are proposed consideration should be given to NJUG4 (National Joint Utilities Group Volume 4 (Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees)).

5.3 Arboricultural Impact Plan

A plan accompanying this report (found in Appendix A) has highlighted the trees retention category, canopy extent and their current below ground constraints (RPA) superimposed upon the proposed site design. This is used to highlight any possible conflicts/impacts between tree constraints and site design.

6.0 Arboricultural Impact Assessment

6.1 Development Proposal

Planning consent is being sought for external works and car parking found at Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD.

6.2 Arboricultural Impact of the Development

Table 2- Arboricultural Impact of the Development

Impact / work recommended		Retention Category			
		A	B	C	U
1	Trees to be removed to enable development	-	T3, T4, T5, T6	T2,	-
2	Trees recommended for removal as good arboricultural management	-	-	-	T7

6.3 Dead, Declining or Structurally Unsound Trees

Tree T7 has been graded as Retention Category U. This tree is in irreversible decline (upper half dead). Consideration should be made to removing this tree if development goes ahead or not. It could not be left to decline or fail of its own accord post development due to the proximity of adjacent dwellings and proposed parking areas.

6.4 Above Ground Tree Constraints – Tree Trunk and Canopy

Table 2, above highlights the arboricultural impact of the proposed development

- The trunks of trees that are found within the footprint of the proposed car parking areas/areas requiring groundworks to enable updated surfacing - which require removal in order to enable the development, are listed in Row 1, of Table 2 above
- No pruning of retained trees is required in order to enable the development
- Shade from retained trees has not been shown on plan as the proposed development is not domestic

6.5 Below Ground Tree Constraints – Root Protection Areas (RPA's)

- The trunks/and the RPA's of trees that are found within the footprint of the proposed car parking areas/areas requiring groundworks to enable updated surfacing - which require removal in order to enable the development, are listed in Row 1, of Table 2 above
- Holly T1 is proposed for retention. The centre of this tree grows 35cm from the boundary wall to its south. It has previously been felled and the canopy growth now seen is coppice re-growth from that stump. In the opinion of this reports author Holly tolerates root pruning, that may be necessary to the eastern side of its RPA under the current site access. Recommendations on dealing with any exposed roots during groundworks is provided in section 7.7 below. Should this tree require some root pruning during development it will have access to new rooting area with the loss of Ash tree T2
- Service runs such as electricity have not been provided, if required they will likely be within the footprint of the proposed development, outside the RPA's of any retained tree
- Groundworks, excavation and build can still be detrimental to the RPA's of retained trees so these will have to be protected from compaction/alteration by the use of temporary tree protective fencing

6.6 Construction Access & Storage of Materials

Construction plant and machinery will access the site from the current access to the south, off Vicarage Road. Storage is available in the footprint of the proposed car park, outside retained trees RPA's.

6.7 Impact on Amenity

The trees proposed for removal can be viewed from immediately south of the site on Vicarage Road but due to the high number of similar sized trees within the site grounds and immediate properties they do not significantly add to the treescape of the area. The adjacent church to the north/west provides screening from the wider valley so removal is unlikely to be seen from any significant public viewpoint.

6.8 Proposed Planting to Mitigate for Tree Loss

The area immediately adjacent the proposed car park does not have enough room to enable the establishment and full canopied growth of replacement trees. Some potential planting areas have been recommended and are provided in section 7.8 below. A full planting plan, specification and maintenance schedule can be produced as part of a planning condition.

6.9 Tree Species

The only significant retained trees adjacent to the proposed car parking area would be Holly. These do not deposit significant leaf/twig/seed or fruit fall.

6.10 Trees Protection Status

See section 1.5 above.

6.11 Indirect Damage Potential

Section 4.3 of BS 5837 states that a soil assessment should be undertaken by a competent person to determine 'shrinkability' or volume change. I am not a soil scientist and therefore recommend a specialist in this field is consulted if required.

6.12 Conclusions

- Details were recorded for nine individual trees
- Five trees will require removal to implement the development
- One further tree is recommended for removal regardless of development
- The remaining trees will require protection by the installation of tree protective fencing
- It is considered the development can go ahead following recommendations in British Standard 5837 without significant detriment to retained trees
- Tree related operations should be appropriately timed, monitored and recorded to ensure the health and longevity of retained trees – see section 7 below

7.0 Recommendations

7.1 Project Arboriculturist

BS5837 recommends the appointment of a Project Arboriculturist to ensure that on and off-site trees are fully considered during the development process. Aire Valley Tree Consultancy Ltd, whose contact details are at the rear of this report can be appointed if required. Any tree related enquiry, no matter how minor should be directed to them. Consultation is often time well spent.

7.2 Tree/Ground Protection – Generic Precautions

These general precautions **must** be followed within the RPAs of **retained** trees during the construction phase:

- No soil disturbance, including compaction*
- No change in the soil level, by stripping or filling*
- No excavation, without prior discussion with the Project Arboriculturist and/or the Local Planning Authority*
- No redirection of surface water runoff into or out of the RPA
- No temporary buildings, sheds, or offices, without prior discussion with the Project Arboriculturist and/or the Local Planning Authority
- No storage of materials or fuel
- No dumping of materials, whether into a skip or onto the ground
- No fires within 10m of the RPA or tree canopy, whichever is greater
- No refuelling of mechanical equipment
- No storage or mixing of cement
- No washing of cement mixers within or uphill of the RPA
- Follow the guidance contained within the National Joint Utilities Group Volume 4 (Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees (Issue 2, 2007); www.njug.org.uk) when installing underground services inside or other excavation in the RPA of a tree.
  *unless in footprint of approved plans (T1)

7.3 Tree Work Recommendations

A tree work schedule is included in Appendix C in the 'Management' column.
Contractor vehicles and plant to only park outside retained trees RPA's.

7.4 Tree Work Standard - BS 3998:2010

All tree work should be carried out in accordance with BS 3998 2010 "Recommendations for tree work" by a competent, qualified arborist. They must also hold sufficient public/employees liability insurance.

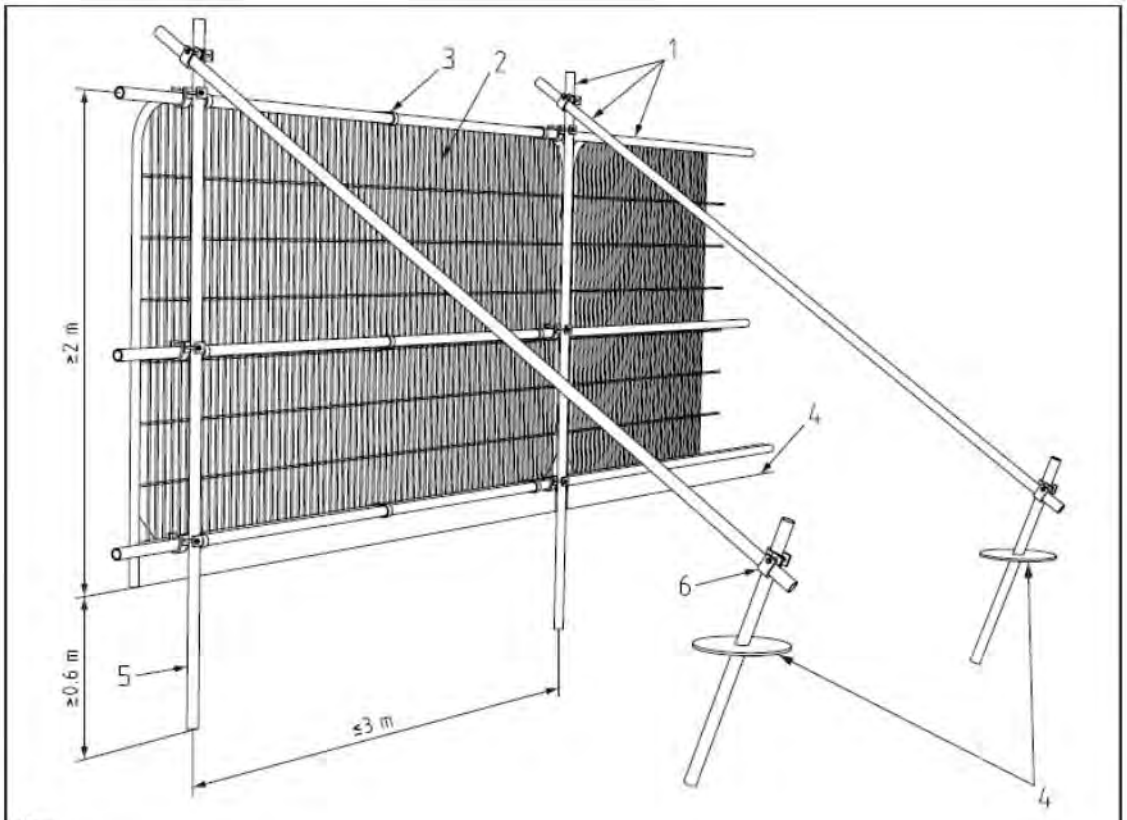
7.5 Bird & Bat Activity

Consideration should be made with regards to bird and bat activity. All bird's nests are protected when in use, bat roosts are protected whether in use or not. Bats are fully protected under schedule 5 of the Wildlife & Countryside Act 1981 and the Countryside and Rights of Way Act 2000.

7.6 Tree Protective Fencing

Protective fencing should be erected as shown on a Tree Protection Plan forming a 'Construction Exclusion Zone.' This can be produced to meet a planning condition following an approved site design.

Fencing will prevent construction activity that could cause damage to retained trees or their rooting areas. No plant, equipment or vehicles should operate within the protective fencing without suitable ground protection and agreement from the Project Arboriculturist or Local Planning Authority. The fencing must be robust enough to withstand impacts from machinery and plant equipment operating in the area. Paragraph 6.2.2 and Fig. 2 & 3 of BS5837 details the appropriate fencing specification. The appropriate fencing is shown below.



Key

1 Standard scaffold poles
2 Heavy gauge 2 m tall galvanized tube and welded mesh infill panels
3 Panels secured to uprights and cross-members with wire ties
4 Ground level
5 Uprights driven into the ground until secure (minimum depth 0.6 m)
6 Standard scaffold clamps

The protective fencing should be erected prior to any other development activity taking place and remain in place for the duration of the construction phase.

The picture below shows the required fencing specification used elsewhere as examples

This sign (below) must be laminated and securely fixed to the outside/site side of the Tree Protective Fence line. Replace when weathered or lost. Available as a pdf on request

7.7 Excavation within Retained Trees RPA's

- Roots of 25mm diameter or less should be moved to one side of the excavation or be cut back with a sharp tool, such as secateurs, leaving as small a wound as possible, except where they occur in clumps.
- Roots greater than 25mm in diameter to be retained. These must be wrapped in damp hessian to prevent damage and desiccation, but removed prior to backfilling.
- Installation of new surfacing/footing should take place as soon as possible after excavation to reduce the time roots will be exposed.

7.8 Potential Tree Planting Locations

See plan below. Red area – trees to remove. Green area – potential planting areas

8.0 Arboricultural Method Statement 'Heads of Terms'

Section 6.1 and Table B1 of BS 5837 state the need for Arboricultural Method Statements.
Unless the proposed development is especially complex the need for a detailed Method Statement can be left to meet reserved matters/planning conditions.

I foresee the 'heads of terms' which would be included in a Method Statement to meet reserved matters or planning condition would be:-

- Phased and auditable system of site procedures, monitoring and responsibility
- Finalised tree work schedule
- Dimensioned tree protection plan with ground protection/protective fence location detailed
- Project Arboriculturist monitored installation/sign off of tree protection
- Tree planting specification and plan
- Removal of tree and temporary ground protection
- Tree appraisal and recommendations

This list is not exhaustive and will obviously reflect the needs of any consent.

Appendix A: Tree Constraints & Arboricultural Impact Plan

Tree Constraints Plan showing current site, tree locations, canopy spread, root protection areas and retention category

Arboricultural Impact Plan showing proposed development, tree locations, canopy spread, root protection areas and retention category

Appendix B: Authors Qualifications & Experience – Ross Cannon

1. Qualifications

In 2001 I was awarded a National Diploma in Urban Forestry.

In 2006 I was awarded the Arboricultural Associations Technicians Certificate.

In 2011 I became a Technical Member of the Arboricultural Association.

2. Experience

I have been working and studying within the field of arboriculture since 1999, first as a tree surgeon and latterly in an advisory capacity. Between 2001 and November 2007 I was a tree surgeon for a large local authority. Between November 2007, and December 2008 I worked as a Tree Surveyor and then Arboricultural Officer for Leeds City Council. This involved various large-scale tree condition and management surveys and carrying out detailed tree inspections. Between December 2008 and December 2011, I was a Trees & Woodlands Officer for the Yorkshire Dales National Park Authority administering tree preservation orders, trees in conservation areas and providing advice to the development control section on matters relating to trees in relation to proposed development. From December 2011 to present I have been undertaking independent tree consultancy services for architects, developers, local authorities, parish councils and private landowners.

3. Continuing professional development

I attend courses, conferences, seminars and workshops run by land management, forestry and arboricultural organisations, colleges and universities.

All information given in this report is based upon the experience of the author and backed up with relevant arboricultural knowledge available at the date of inspection

Appendix C: Tree Details & Site Photographs

Tree ID: Each tree/group has been given a unique number, which coincides with the site plan located in Appendix A. Where instructed small mounted numbered metal ID tags will be applied to each tree surveyed.

Species/Common name: Where a cultivar, variety or species cannot be accurately given the genus name only will be given.

Height (m): This is measured approximately to the nearest 1m.

Stem Diam /DBH (mm): The Diameter at Breast Height of the given tree at 1.5m above soil level, (On sloping ground taken on the up-slope side of the tree base). Where the tree is multi-stemmed measurements will be taken below the junction where possible.

Crown Spread: Describes the crown radius from the base of the tree in four compass directions, recorded to the nearest half meter.

Low Canopy Height & First Significant Branch and Direction: In m to aid management options

Age Class: Is described (or abbreviated) as newly planted, young, semi-mature, early mature, mature, or over mature.

Health: Physiological condition gives an assessment of the tree's health and vitality, die back and the presence of disease. It is described as **Good** – no significant health problems, **Fair** – Tree less than optimal condition, small buds/internodal distance, early decline or **Poor** = significant ill health/in decline.

Comment: Narrative comment on general tree condition, significant defects and overall appearance, for example presence of pathogens and structural condition, it is described as **Good** – no significant defects, **Fair** – significant defects that can be remediated or **Poor** – significant defects which cannot be remediated.

Management: Work recommended or required to implement the development or for good arboricultural practise.

Retention Category: Each tree/group is identified with a retention category in accordance with BS 5837,

Abbreviations: figures suffixed with a '#' indicate that the value is estimated rather than measured due to site constraints. All measurements in this survey/report should be considered estimates.

Ref.	Tree Type	Height (m)	Stem Diam (mm)	North (m)	East (m)	South (m)	West (m)	Crown Clearance (m)	First Branch (m)	Age Class	Health	Comment	Management	Retention Category
T1	Holly	7.5	282	3	3	3.5	3	2.5	0	M	G	Centre growing 35cm from wall multi-stemmed form, growing from previously felled stump/coppice growth	None/root prune as per NJUG 4	C
T2	Ash	17	622	8	5	6	5	2	3.5	M	F	70/80% normal canopy, some decline consistent with 'ash dieback disease'	If permission given remove in order to enable development	C
T3	Sycamore	17	770	6	3	7.5	7	2	6	M	G	Growing in raised soil area, RPA off-set. Basal and stem epicormic growth prevent full inspection. Formally heavily pruned to east at 9m, now with asymmetric canopy	If permission given remove in order to enable development	B
T4	Holly	5	170	1.5	2.5	2	2	1.5	2	M	G	Ornamental canopy, previously 'topped' at 1.5m	If permission given remove in order to enable development	B
T5	Holly	6	205	4	3	1.5	3.5	1.5	1	M	G	Previously 'topped' at 1.5m	If permission given remove in order to enable development	B
T6	Sycamore	18	450	4	3.5	3	6	2.5	7	M	F/G	Growing in raised soil area, RPA off-set. Basal and stem epicormic growth prevent full inspection. Formally heavily pruned to east at 9m, now with asymmetric canopy	If permission given remove in order to enable development	B
T7	Sycamore	17	460	4	4.5	3	5	3.5	7	M	P	Growing in raised soil area, RPA off-set. Basal and stem epicormic growth prevent full inspection. Formally heavily pruned to east at 9m, upper canopy dead/significant decline	Recommend removal and replacement regardless of development - tree poses a risk to adj, dwelling	U
T8	Holly	8	255	1	2.5	2.5	3	1.5	1	M	G	Ornamental canopy, previously 'topped' at 1m	None	B
T9	Norway Maple	19	467	5	6	5	7	3	3	M	G	Basal and stem epicormic growth/ivy/shrubs prevent full inspection, twin stems at 1m, union sound	None	B

Site Photographs

T1 Holly	T2 Ash
T7 – upper half dead/significant decline	View of main site trees

Appendix D: Trees in Design & Planning Process – Extracts from BS 5837: 2012

A copy of table B.1 from BS 5837 is found below. Trees whether subject to statutory protection or not are material considerations taken into account when dealing with planning applications. Table B.1 provides some advice to both developers and local planning authorities (LPA) on the appropriate amount of information required during the application process. Minimum detail includes information that is expected, additional information identifies further details that might be reasonable be sought by the LPA.

Table B.1 – Delivery of tree-related information into the planning system

Stage of process	Minimum detail	Additional information
Pre-application	Tree survey	Tree retention/removal plan (draft)
Planning application	Tree survey (in the absence of pre-application discussions) Tree retention/removal plan (finalised) Retained trees and RPA's shown on proposed layout Strategic hard and soft landscape design, including species and location of new planting Arboricultural impact assessment	Existing and proposed finished levels Tree protection plan Arboricultural method statement – heads of terms Details for all special engineering within the RPA and other relevant construction details
Reserved Matters/ **Planning conditions**	Alignment of utility apparatus (including drainage), where outside the RPA or where installed using a trenchless method. Dimensioned tree protection plan Arboricultural method statement – detailed Schedule of works to retained trees, e.g. access facilitation pruning Detailed hard and soft landscape design	Arboricultural site monitoring schedule Tree and landscape management plan Post-construction remedial works Landscape maintenance schedule

Appendix E: Authors Signature & Declaration

It is trusted that this report provides the necessary information for the client and LPA to make an informed decision regarding tree management on the site, but should any further advice be required please do not hesitate to contact the author.

Signed Monday, 23 October 2023

.....

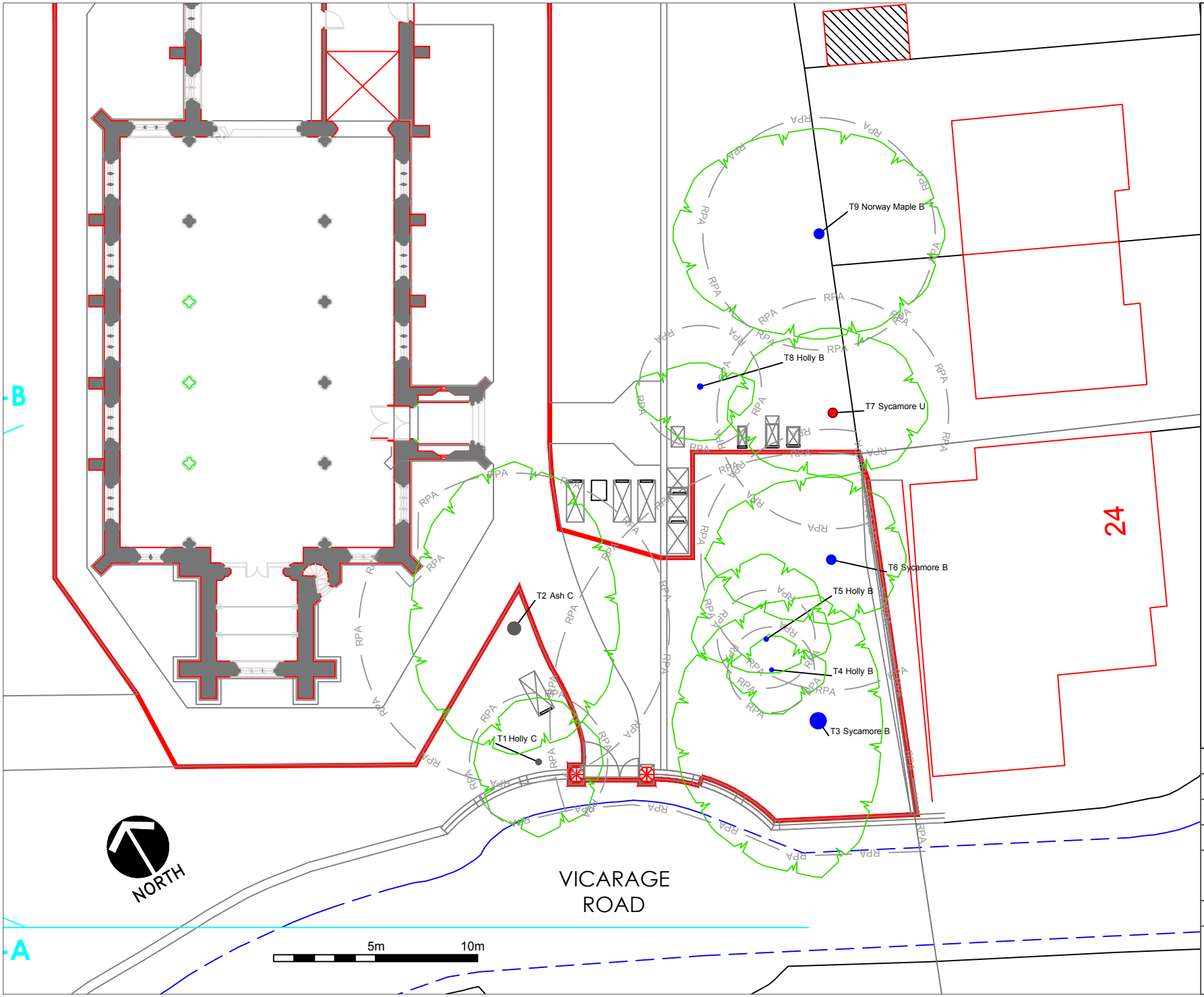
Ross Cannon ND (Urb. For.). Tech. Cert. (Arbor. A.). Tech. Arbor A

http://www.avtcl.co.uk/

07599358056

The Old Smithy, Lee Lane East, Horsforth, Leeds, LS18 5RE

© This report is the copyright of Aire Valley Tree Consultancy Ltd. Any unauthorised reproduction of usage by any person other than the addressee is strictly prohibited.



Item Reference Number
Common Name
BS 5837 Retention Category

Stem Location & Diameter

Root Protection Area (RPA)
Canopy Spread

BS 5837 Retention Category Colour

- Category A - Tree of High Quality
- Category B - Tree of Moderate Quality
- Category C - Tree of Low Quality
- Category U - Tree Unsuitable for Retention

Notes:

Tree Locations plotted on provided plan ref 22-111 with exception of T1 & T8 (location plotted on site)

RPA altered in shape but not area for trees T1, T2, T3, T6 & T7 due to build structure/root barriers

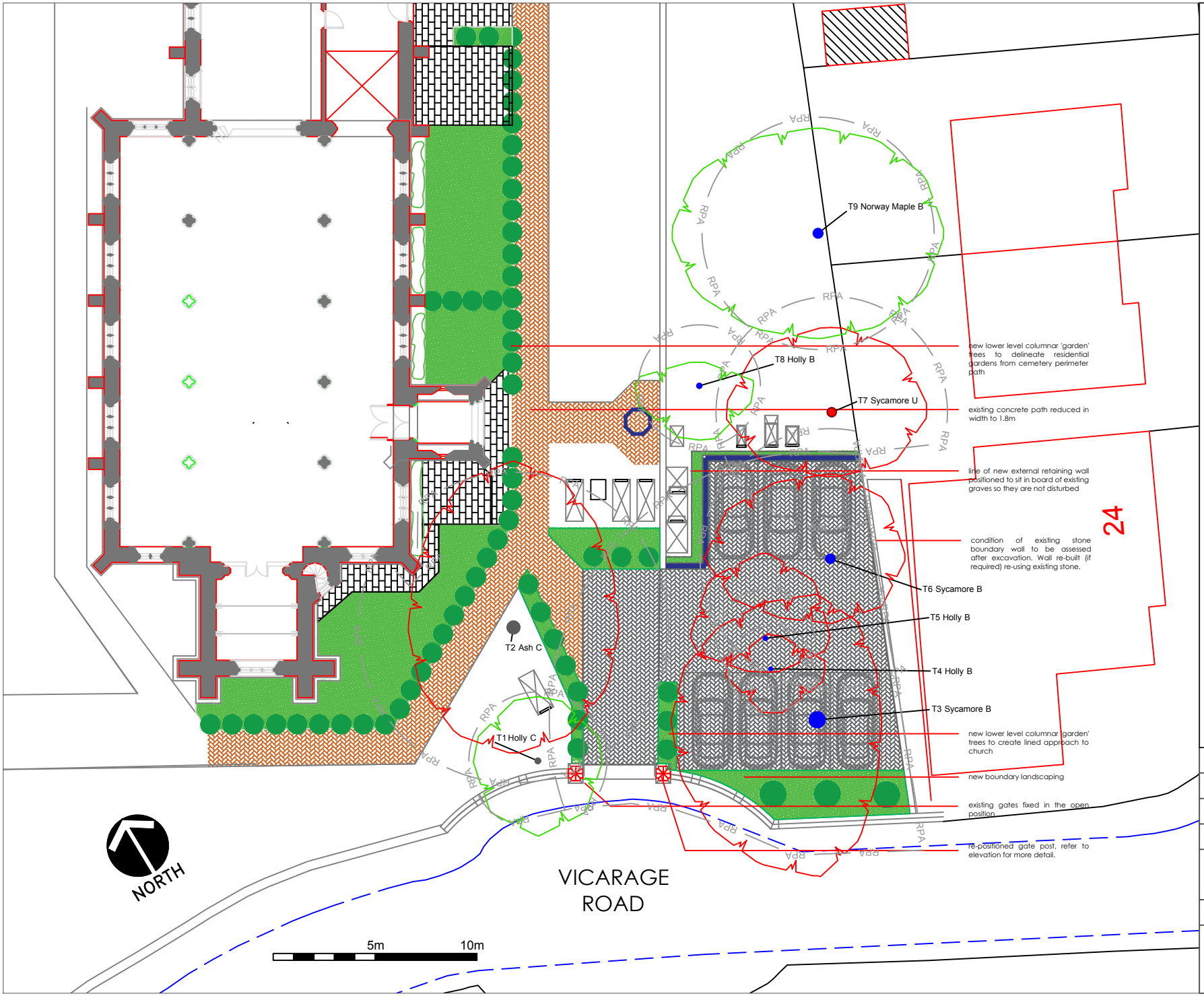
For planning purposes only, check all measurements on site
Read in colour & with associated report. Copyright.

PLAN 1 OF 2

Scale	1:250@ A3
Plan Title	Tree Constraints Plan
Site	Church of Holy Innocents WF12 9PD
Date	October 2023

avtcl.co.uk

Aire Valley Tree Consultancy Ltd.



Item Reference Number
Common Name
BS 5837 Retention Category

Stem Location & Diameter

Root Protection Area (RPA)
Canopy Spread

T025 Spruce B2

BS 5837 Retention Category Colour

- Category A - Tree of High Quality
- Category B - Tree of Moderate Quality
- Category C - Tree of Low Quality
- Category U - Tree Unsuitable for Retention

Notes:

Tree Locations plotted on provided plan ref 22-111 with exception of T1 & T8 (location plotted on site)

RPA altered in shape but not area for trees T1, T2, T3, T6 & T7 due to build structure/root barriers

Tree to Remove
Canopy shown RED

For planning purposes only, check all measurements on site
Read in colour & with associated report. Copyright.

PLAN 2 OF 2

Scale	1:250@ A3
Plan Title	Arboricultural Impact Plan
Site	Church of Holy Innocents WF12 9PD
Date	October 2023

avtcl.co.uk

Aire Valley Tree Consultancy Ltd.

From: Davies, Glyn
Sent: 21 August 2023 15:39
To: DCAdmin
Cc:
Subject: Consultation Response 2023/62/92127/E - Church of the Holy Innocents, Vicarage Road, Dewsbury

CAUTION: External email. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This application relates to the proposal to convert the Church of the Holy Innocents to two residential properties.

The application is supported by a combined Heritage, Design & Access Statement and several plans which provide a basic description of the church and its surrounds but does not provide sufficient detail to fully assess the impact of the proposed changes.

The church which was built in the late 1850s is one of three listed buildings within the church property but in addition there are further listed buildings in the vicinity that relate to the church primarily the Vicarage and Vicarage gates across the road in front of the church. The vicarage gates are of the same style as the church gates and were obviously designed to match them.

The Church Listed Building No. 1300421
The Sundial Listed Building No.1300424
The Gate and Gatepiers Listed Building No. 1313648
The Vicarage Listed Building No. 1134713
The Vicarage Gate and Gatepiers Listed building No. 1183833

Recommended Course of Action
We recommend that, in accordance with national and local policies the developer is required to provide the Planning Authority with an archaeological assessment, based on appropriate analytical methods, of the archaeological implications of the proposed development. We strongly recommend that this assessment should be carried out prior to the determination of this application to permit the design of an adequate archaeological/heritage response.

A photographic buildings appraisal is required that will provide a record of the church and related structures to assess the impact of the proposed changes. This needs to include photo location plans and a written description highlighting the key features of the church.

- The record should include a record of any internal memorials and wall plaques. The existing architects drawings can be used to as base maps for the photo viewpoint plans and elevations and these should be annotated with photo viewpoints and plaque locations.
- The aim should be to identify the significance of the church and related listed buildings and non-designated structures around the church that relate to the church.
- The appraisal needs to consider the proposed changes to the church, its heritage significance, and the impact of the changes on the heritage significance.
- In addition the appraisal needs to assess the impact of the proposed changes in the wider landscape such as the burial ground, churchyard walls and the gate. This should consider the potential impact of any proposed changes on any burials that may be present and impacted by external changes, such as the provision of services and car parking to the proposed residential properties.

- The appraisal should refer to the West Yorkshire Archaeology Advisory Service's Research Agenda for Historic Buildings. In particular the section relating to Post-medieval Anglican churches. https://www.wyjs.org.uk/media/1274/historic-buildings.pdf

The buildings appraisal should be carried out by an appropriately qualified buildings archaeologist or similar.

Further archaeological advice will depend upon the results of the appraisal but may vary from: a recommendation for refusal or re-design of the development proposal, to carry out archaeological recording in advance of development, to have an archaeologist on site during development works to record anything of interest that is revealed (a 'watching brief'), or that no further archaeological work is required.

We advise that it is in the developer's interests to carry out the assessment as early as possible, in order that the full implications and cost of any archaeological discoveries can be taken account of when planning the project.

Further works, if appropriate, may be secured by placing a suitably worded condition on any grant of planning permission awarded by the local planning authority.

Recommended Condition
"No development to take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological
recording. This recording must be carried out by an appropriately qualified and experienced archaeological organisation or consultant, in accordance with a written scheme of
investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority."

Or, as an alternative to the above model condition, which was first introduced in 1990, the following condition is suggested by Historic England in their Historic Environment Good
Practice Advice, Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment, 2015 paragraph 37:

"No demolition/development shall take place/commence until a written scheme of archaeological investigation (WSI) has been [submitted to and] approved by the local planning
authority in writing. For land that is included within the WSI, no demolition/development shall take place other than in accordance with the agreed WSI, which shall include the
statement of significance and research objectives, and

- The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition
shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI"

Detail of Archaeological Work
Details of the necessary archaeological work, in the form of a specification, will be provided to the developer, on written request, by the WY Archaeology Advisory Service in
our capacity as Kirklees Council's advisors on archaeological matters. The WY Archaeology Advisory Service will also be responsible for monitoring the work of the archaeological
contractor commissioned by the developer to undertake this work, on behalf of the Planning Authority. From the 1st of April 2011 in accordance with the agreement of the
Council Committee that oversees our work the WY Archaeology Advisory Service will charge the developer for these and concomitant services. Please note that the production
of a specification may take up to three working weeks from receipt of a written request. It is in the applicant's interest that they be made aware of this likely timescale.

The WY Archaeology Advisory Service can also provide a list of archaeological contractors who may be available to tender for the work. In order to aid the developer to meet the

requirements of the above condition I would suggest that it might be helpful to add the following as a note to the planning permission:

“For further information please contact: Glyn Davies, West Yorkshire Archaeology Advisory Service: 0113 3782249.”

We would strongly suggest that the developer is advised that a reasonable period of time for the execution of the necessary archaeological work must be allowed for within the
overall site timetable. Any commencement of work on site prior to the approval and implementation of an archaeological specification, and/or any failure to schedule work
properly that results in inadequate archaeological recording, should be deemed by the Planning Department to be a breach of the planning condition.

Yours

Glyn

West Yorkshire Archaeology Advisory Service

Glyn Davies | Senior Archaeological Officer

| t: 0113 3782249
| e: Glyn.Davies@wyjs.org.uk

West Yorkshire Archaeology Advisory Service , West Yorkshire Joint Service,
Nepshaw Lane South, Morley, Leeds LS27 7JQ

www.wyjs.org.uk/archaeologyadvisory

West Yorkshire Joint Services

The information in this email (and any attachment) may be for the intended recipient only. If you know you are not the intended recipient, please do not use or disclose the information in any way and please delete this email (and any attachment) from your system.
The Council does not accept service of legal documents by e-mail.

Legal notice: Leeds City Council contracts on the basis of a formal letter, contract or order form. An e-mail from Leeds City Council will not create a contract unless it clearly and expressly states otherwise. For further information please refer to: https://www.leeds.gov.uk/councillors-and-democracy/council-constitution

Climate Change Statement

Church of the Holy Innocents, Vicarage Rd, Dewsbury, WF12 9PD

Part 1: Applicant details

Name of applicant/agent	SC1 Property Ltd
Site Address	Church of the Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD
Description of Development	The conversion of an existing Grade II listed church building into residential accommodation

Part 2: Climate Change Mitigation measures

Q1: What measures have been/will be taken to reduce the energy demand associated with your proposed development beyond the minimum required in Building Regulations?
The following measures will be implemented or considered at technical design stage; • Internal rooms formed in insulated walling to create individual thermal 'boxes' which will reduce fabric heat loss between internal room thus reducing energy consumption. Rooms will have individual heating controls for flexibility. • Consideration given to ascertain if a micro-CHP system (Combined Heat and Power) will be suitable for a grade 2 listed building. • Installation of smart energy meters which include displays showing the amount and cost of energy consumed • Energy efficient white goods will be specified where appropriate. • Ensuring that building service controls ie lighting and gas boiler controls, and management systems are user friendly, efficient, up to date, and complementary. • Full instruction manuals & tutorials for residential occupiers will be provided/undertaken to ensure home owners understand how the systems operate at their most efficient level.
Q2: What measures have been/will be taken to limit the carbon consumed through the implementation and construction processes, e.g. by reusing existing on-site materials or sourcing materials locally?

The following measures will be implemented where practically possible;
• Demolition: Demolition has been limited to 0.3% of the building volume.
• Construction waste management: The site waste manager would report to the contract manager and would be responsible for overall waste management issues arising from the project. These would include :
  o Implementation and monitoring of waste minimisation, segregation and safe disposal measures.
  o Dissemination of waste reduction and waste management procedures to all relevant personnel on site.
  o A variety of different materials will be used for construction of the development. The project also involves removal of existing buildings and services which will produce waste materials.
  o A key requirement for the contractor would be to manage waste production throughout the construction period. Sustainability is likely to be one of the selection criteria for suitable contractors for the project. Waste management will comply with Waste Management regulations 2008
  o The key to minimising the production of waste is to implement the waste hierarchy of reduce, reuse, recycle, dispose. Reducing the amount of materials used also has the effect of minimising use of natural resources and reducing costs. Careful management and phasing of the development will ensure that this is the case.

- Superfluous design elements have been designed out to minimize the use of construction materials. The existing structure will be retained untouched as far as practically possible.
- Materials use in construction will be sourced from local suppliers wherever possible.
- Materials will be of good quality and robust nature where practical to limit maintenance and replacement.
- All timber shall be from sustainable Forest Stewardship Council (FSC) sources.
- Consideration will be given to the impact of incorporating home composting units.

Q3: What measures have been/will be taken to utilise renewable or low carbon energy sources?

The opportunity to incorporate renewable technology will be limited by the existing building, existing grounds & grade II listing. This technology will be considered with the mechanical & heating specialist at tender stage to see if any can be incorporated into the development.

Q4: What measures have been/will be taken to ensure the building design and layout has been optimised to energy efficiency beyond the minimum requirements in Part L of the Building Regulations ?

The scope for building design & layout to influence the energy efficiency is limited by the existing building form, existing grounds & grade II listing.

Where practically possible energy efficiency will be promoted via:

- Extra insulation within internal walls & floors to break the residential units down into numerous internal thermal zones. These zones will have thermostatic controls to maximise flexibly on heat/power consumption.
- High efficiency heating boilers with zone temperature control
- Where safe to do so low energy lights and lighting controls to automatically switch off will be considered.

Q5: What measures have been/will be taken to reduce potential impacts of flooding associated with your proposed development?

Flood risk of the existing site is very low due to its location. Additional load on surface water systems from this development is limited to the carpark area only. Once a ground investigation has been undertaken the viability of suds system will be assessed and incorporated if practical.

Q6: What measures have been/will be taken to reduce water stress associated with your proposed development? (e.g. Water retention and minimisation measures)

Water usage will be minimized by incorporating the following were practically possible;

- Installation of low-flush toilets and dual-flush toilets reduce water usage
- Installation of Spray and low-flow taps reduce the amount of water used.
- Installation of Showers to use less water than baths. Use of low volume baths where appropriate
- Installation of low water use washing machines and dishwashers
- Ensuring the residents are more aware of the cost of water
- Rainwater harvesting & grey water recycling will be considered.

Q7: What measures have been/will be taken to provide biodiversity net gains?

Refer to BNG report submitted with the application.

Q8: What measures have been/will be taken to reduce air pollution associated with your proposed development?

The following will by incorporating the following were practically possible;

- Locally source materials to reduce transport emissions
- Installation of mechanical ventilation systems due to the limited availability to vent the building through natural means.

DCAdmin

From:
Sent: 10 September 2023 17:41
To: DCAdmin
Cc:

Subject: application number 2023/92128 at location Church of the Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD

Categories:

Holy Innocents, Vicarage Road, Dewsbury 2023/92128

Thankyou for your consultation.

The best use for an historic but redundant church is one that exploits its nature as an auditorium and maintains its role as building open to the broad community. Churches were intended to be public buildings.

Adaptation as two houses (with an apparently irreversible division that cuts right across the nave) fights with those two principles.

With a building of this quality (listed at Grade 11 but definitely in the upper level of that grade if not higher) alienating it from continued public use is a major loss to the community and we presume that the presumption and preference will lie with a thorough search for such a use before consideration goes to the building's privatisation as housing. This is the more so because the building was only recently in receipt of £177,000 in public money in a grant from the National Lottery Heritage Fund. It is a truism that to build an auditorium of this quality at today's prices would cost several millions. Its potential for the broader community needs to be exhausted before it is cut up as housing.

Dealing with the application as lodged :

1. We can welcome the express retention of the stained glass , the font (we presume with its cover), the pulpit and the memorial plaques. However

we urge great caution over the application of secondary glazing to the inner face of stained glass. A second skin of glass will have be installed with provision for adequate ventilation of the cavity but even with that, the reflections will make it more difficult to appreciate the stained glass whilst any second skin makes access for repair and maintenance more complicated. Drawing A16 implies at annotation b that there will also be "external sheeting covering the existing stained glass windows". Really ? An internal and an external skin will distort the appreciation of the glass both inside and out. The need for external protection is not proven. In our experience converted churches suffer markedly less vandalism than churches still in religious use. A house is likely to be occupied far more frequently than a place of worship. Moreover if "sheeting" means polycarbonate sheeting that is highly inadvisable as poorer quality polycarbonate goes opaque over time, ruining the visual effectiveness of the stained glass and providing a more visible surface for bird lime and other staining.

The stained glass is an important set by William Wailes, so well known in his day that he was able to build himself a substantial mansion – Saltwell Towers in Gateshead. And so appreciated now by his hometown that its conservation a decade ago with a Lottery grant involved the permanent location of an exhibition on him and his stained glass.

2. The holiest and richest part of the building is the chancel and sanctuary to the East. It was this section of the interior that cries out to be preserved intact. I cannot find any confirmation on Drawing A13 that any of the choirstalls, the reredos or encaustic floor tiles are to stay, although the section (Drawing A17) implies that the reredos and organ pipes are to remain. Drawing A11 refers to the retention of the organ but the base including the console and return panelling appears to go.

   Can it be spelt out expressly what is and is not to stay in the chancel ?

   The woodwork is self-consciously more elaborate than that in the nave, it is all original and the work of Mallinson and Healey – and some were carved by that rare phenomenon in the 19th century, a female craftsperson – Catherine Mawer working for Mawer and Ingle, who were the contractors.

The organ by the way is “listed” on the National Pipe Organ Register, run by the British Institute of Organ Studies, under reference F00032.

We can welcome the absence of any partitioning in the chancel.

3. It is hard to resist the loss of the nave pews (which would probably have to go in an auditorial use) but we urge that a representative example be retained, if necessary pushed against an outer wall.

4. The roofs are to be peppered with rooflights, 46 on my count (Drawing A14). Moreover, whereas those on the two aisles are placed evenly, those on the nave are grouped much more capriciously, disturbing the clean lines and sweep. This fights with the nobility of the present exterior and will need to be compellingly justified before being permitted.

   A design for the rooflight will need to be produced now or as a Reserved Matter.

5. The quality of the drawings is excellent but we infer that the work is not to be entrusted to a conservation architect or surveyor. At Companies House the single person registered with SC1 Property is described as an “Architectural Technician”. Work on a building of this quality should be entrusted to a professional with appropriate conservation credentials and preferably experience too of working on churches.

6. The site is important for its grouping of the vicarage and school with the church, all designed by Mallinson and Healey and within the church grounds the sundial and boundary walls are both listed. We presume that both of these will stay intact and that any management regime for the church building will extend to these as well.

7. Is there a management regime for the several trees that are protected under TPOs ?

8. It does seem legitimate for a planning authority to ask how the site as a whole (church, boundary wall, sundial and the grounds) is to be managed given the projected split in occupation between two households. Will

there be a service company ? How will maintenance of the tower and spire, potentially a very considerable liability for the future, be shared ?

As a courtesy a copy of this email is being shared with the applicants.

We will of course comment again once the matters outlined above have been addressed.

Matthew Saunders
ECCLESIASTICAL CASEWORKER

HISTORIC BUILDINGS & PLACES

www.hbap.org.uk
Formerly Ancient Monuments Society

St Ann's Vestry Hall
2 Church Entry
London, EC4V 5HB

Historic Buildings & Places,
the working name of the
Ancient Monuments Society,
is a registered charity in England
and Wales (no. 209605).

Matthew Saunders
ECCLESIASTICAL CASEWORKER

HISTORIC BUILDINGS & PLACES

www.hbap.org.uk
Formerly Ancient Monuments Society
+44 (0)20 7236 3934

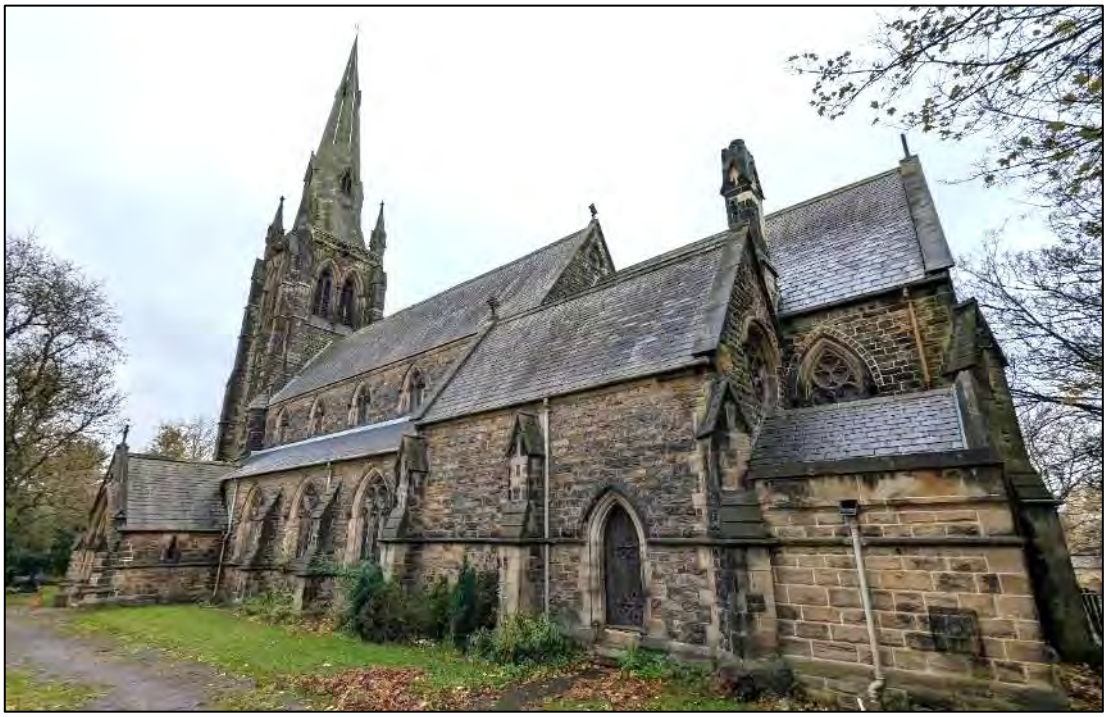
St Ann's Vestry Hall
2 Church Entry
London, EC4V 5HB

Historic Buildings & Places,
the working name of the
Ancient Monuments Society,
is a registered charity in England
and Wales (no. 209605).

Church of Holy Innocents, Dewsbury

Ecological Impact Assessment

8th December 2023



Prepared by:

Middleton Bell Ecology, School House, Green Moor, Sheffield, S35 7DQ

Document ref: MBE/ECO/2023/30/01				
Purpose and Description	Originated	Checked	Reviewed	Date
For Planning	R Bell MCIEEM	P Middleton MCIEEM	G Slack MCIEEM	08/12/2023

Disclaimer

This report is issued to the client for the sole use and for the intended purpose as stated in the agreement between the client and Middleton Bell Ecology (MBE) under which this work was completed, or else as set out within the report. This report may not be relied upon by any other party without the express written agreement of MBE. The use of this report by unauthorised third parties is at their own risk and MBE accepts no duty of care to any such party.

MBE has exercised due care in preparing this report, it has not, unless specifically stated, independently verified information provided by others. No other warranty, express or implied, is made in relation to the content of this report and MBE assumes no liability for any loss resulting from errors, omissions or misrepresentation made by others.

Any recommendations, opinion or finding stated in this report is based on circumstances and facts as they existed at the time that MBE performed the work. Nothing in this report constitutes legal opinion. If legal opinion is required, the advice of a legal professional should be secured.

Contents

1. Summary 3
2. Introduction 4
3. Site Description 4
4. Methodology 5
5. Ecological Baseline 7
6. Assessment 19
7. References 23
Appendix 1. Relevant Legislation and Planning Policy 24
Appendix 2. Designated Sites Plan 27
Appendix 3. UK Habitat Classification Plan 28
Appendix 4. Plant Species Recorded on Site 29
Appendix 5. Biodiversity Metric 4.0 Headline Results 30
Appendix 6. Proposed Site Habitat Plan Converted For Metric Input 31
Appendix 7. Guidelines For Installing Swift Nest boxes in Church Belfries 32

Site Name Church of Holy Innocents	**Location** Vicarage Road, Dewsbury, WF12 9PD
Local Authority Kirklees Council	**Grid Reference** SE 24171 20327
Surveyor Robert Bell MCIEEM	**Date of Survey** 15/11/2023
Soilscape Slowly permeable seasonally wet acid loamy and clayey soils	**Designation of Site** Within Kirklees Wildlife Habitat Network

UK Habitat Classification habitats on Site Habitats: g4 – modified grassland, u1b5 – buildings, u1b6 – other developed land Secondary codes: 32 – scattered trees, 90 – cemeteries and churchyards, 828 – vegetated garden, 853 – mortared wall
Protected/Notable Species, Constraints on Site Potential for roosting bats, probable nesting birds, montbretia (Schedule 9 listed invasive species)
HPIs and SPIs under NERC Act 2006 Potential for several SPI bat species (soprano pipistrelle and brown long-eared bat)
Kirklees BAP Potential for several bat species (soprano pipistrelle and brown long-eared bat)

1. Summary

1.1.1 This ecological impact assessment of Church of Holy Innocents was commissioned by Simon Cornell of SC1 Property on 24th October 2023. The survey was commissioned to inform residential conversion of the Grade II listed Church of Holy Innocents.

1.1.2 The red-line boundary comprised a 0.125 ha plot of land, comprising a subset of the wider former Church of England landholding. Within the red-line boundary the large Grade II listed stone church, occupies a large proportion of the site, with this building surrounded by a footpath. Between the church building and footpath were sections of regularly-mown modified grassland (part of which comprised graves), small flowerbeds and sections of hard standing. The southeastern corner of the site, beyond the circular footpath comprised an access path and section of embankment, with the embankment supporting a number of trees with infrequently mown grassland beneath. The site is located within the Kirklees Wildlife Habitat Network.

1.1.3 It is proposed to convert the church into two dwellings. The embankment supporting the four trees in the southern corner of the site will be excavated to create a new parking area. Land between the church and the path to the southeast of the church will be converted to domestic gardens.

1.1.4 The Headline Results output of Metric 4.0 shows a net loss of 92.31 % of the existing Habitat Units (0.83 Habitat Units) with no change in Hedgerow Units. In order to offset the habitat loss it is proposed to enhance existing habitats within areas of the wider graveyard, outside the red-line boundary. Enhancement proposals are expected to relate to an improvement in the condition of grassland and the planting of new trees. The detail of enhancement proposals is awaiting results of a field survey of these areas.

1.1.5 Further bat survey, to include a hibernation survey visit and a programme of three nocturnal surveys is required to enable confident assessment of potential impacts and inform the need for licensing and/or mitigation/compensation measures. Potential negative impacts arising from the development were identified in relation to trees, bats, birds and invasive species (montbretia).

1.1.6 British Standard 5837 (2012): Trees in relation to design, demolition and construction, should be followed. Root Protection Zones (RPZs) should be calculated and implemented to prevent harm to trees on-site or near the boundary.

1.1.7 Tree felling and the commencement of external works on the church should either take place at a time when they would not be expected to affect nesting birds (outside March to August), or they should be preceded by a nesting bird check, to be undertaken by an ecologist. As an enhancement, four swift boxes should be fitted in the tower.

1.1.8 In order to reduce impacts arising from artificial lighting, it is proposed that new external lighting be minimised.

1.1.9 The existing specimens of montbretia should be hand pulled, making sure to remove the corms (similar to bulbs) and underground stems. Removed material should be disposed of as detailed in this report.

1.1.10 The results of this survey are considered to be valid for 24 months. After this time Middleton Bell Ecology should be contacted to determine the need for update survey.

2. Introduction

2.1.1 This ecological impact assessment of Church of Holy Innocents was commissioned by Simon Cornell of SC1 Property on 24th October 2023.

2.1.2 The survey was commissioned to inform residential conversion of the Grade II listed Church of Holy Innocents. To enable the proposed new land use, a car parking area is proposed for construction in the location of an existing section of tree covered embankment at the southeast corner of the site. Landscaping immediately bounding the church is also to be altered.

2.1.3 The purpose of this report is to present the findings of a UK Habitat Classification survey and an assessment of the site's potential to support protected and notable species. The report considers the ecological value of the site, presents an assessment of the impacts of the proposed development, and provides details of the mitigation and compensation necessary to avoid or reduce these impacts. The scheme's ecological impact is also calculated using the Biodiversity Metric 4.0.

2.1.4 Key legislation relating to designated sites, protected species and habitats is detailed in Appendix 1. The implications of legislation are detailed in the body of the report where necessary.

3. Site Description

3.1.1 The red-line boundary comprised a 0.125 ha plot of land, comprising a subset of the wider former Church of England landholding. A tree covered graveyard bordered the application area to the north west. A combination of the graveyard and Vicarage Road comprised the southern boundary, with Selbourne Road and an additional part of the graveyard comprising the eastern boundary. Though located in a suburban area, the church is located on the edge of a large wooded graveyard with the River Calder 30 m west of the church building.

3.1.2 Within the red-line boundary the large Grade II listed stone church, constructed in 1858, takes up a large proportion of the site, with this building surrounded by a footpath. Between the church building and footpath were sections of regularly-mown modified grassland (part of which comprised graves), small flowerbeds and sections of hard standing. The southeastern corner of the site, beyond the circular footpath comprised an access path and section of embankment, with the embankment supporting a number of trees with infrequently mown grassland beneath.

3.1.3 The site falls within National Character Area (NCA) 37: Yorkshire Southern Pennine Fringe. The Yorkshire Southern Pennine Fringe is a transitional landscape from the upland areas of the Southern Pennines NCA in the west through to the low-lying land of the Nottinghamshire, Derbyshire and Yorkshire Coalfield NCA to the east. The most striking aspect of the landscape is the mingling of predominantly 'gritstone' industrial towns and villages with the strong valley forms and pastoral agriculture of the Pennine foothills.

3.1.4 Natural soils in the area comprised slowly permeable seasonally wet acid loamy and clayey soils.

Figure 1. The site location, as indicated by red circle

4. Methodology

4.1 Data Consultation

4.1.1 West Yorkshire Ecology (WYE) were contacted to request the following information for locations within a 2 km radius of the site:

- Protected and notable species records
- The boundaries of non-statutory designated sites of nature conservation interest

4.1.2 A search of the Multi-Agency Geographical Information for the Countryside (MAGIC) website was undertaken to determine the following:

- The boundaries of statutory designated sites of nature conservation interest
- The locations of historic European Protected Species (EPS) licences granted by Natural England
- The presence of Great Crested Newt (GCN) *Triturus cristatus* records included in either the Class Survey Licence Returns or 2017-2019 Pond Surveys datasets

4.2 Field Survey

UK Habitat Classification Survey

4.2.1 The UK Habitat Classification Survey was conducted by Robert Bell (MCIEEM) on 15th November 2023 using UK Habitat Classification habitat survey methodology (UK Hab Ltd., 2023).

4.2.2 Notable, rare or scarce plant species were highlighted if present. Evidence of protected species or species of nature conservation importance was recorded where present at the time of survey. Species recorded are included within the report as appropriate. Information is presented on the UK Habitat Classification plan, using Target Notes (TN) to identify particular features of interest, where appropriate.

4.2.3 Aerial photographs (Google Earth) were studied to place the site in its wider context and to look for ecological features that would not be evident on the ground during the walkover survey. This is particularly useful for identifying wildlife corridors and ponds but because the latter are often not apparent on aerial photographs, OS 1:25 000 scale maps are also used.

4.2.4 Habitats of Principal Importance (HPIs) and Species of Principal Importance (SPIs) are included on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 were noted together with priority species and habitats as included on the Local Biodiversity Action Plan (LBAP).

4.3 Method of Assessment

4.3.1 The value and sensitivity of ecological features present on site were determined based on the guidance given in 'Guidelines on Ecological Impact Assessment' (CIEEM, 2018). Individual ecological receptors (habitats and species that could be affected by the development) for the scheme were assigned levels of importance for nature conservation. The highest level is international, then decreasing in order of importance through national, regional, county, local and lastly site.

4.4 Biodiversity Calculation

4.4.1 The Biodiversity Metric 4.0 (Natural England, 2023) was used to calculate the ecological impact of this scheme. This metric uses habitat as a proxy for wider biodiversity with different habitat types scored according to their relative biodiversity value. This value is then adjusted depending on the condition and location of the habitat, to calculate 'biodiversity units'. Biodiversity Metric 4.0 incorporates similar but separate calculations for habitats that require a different method of measurement such as hedgerows, lines of trees, rivers, streams and street trees. Calculations are undertaken in a purpose designed spreadsheet, which provides the main output of the process.

4.5 Survey Limitations

4.5.1 The field survey was undertaken outside the main growing season, when many plant species do not display visible above ground growth. The habitats present on site could however be confidently identified. Where restrictions owing to the time of survey have impacted the ability to assess habitat condition (notably site grassland) these have been discussed in relation to that habitat.

5. Ecological Baseline

5.1 Designated Sites

5.1.1 Designated sites present within 2 km of the site are detailed in Table 1.

Table 1. Designated sites

Designation	Name	Interest	Distance and direction to site
Local Nature Reserve (LNR) and Local Wildlife Site (LWS)	Sparrow Wood	Urban site supporting mixed deciduous woodland	85 m east
	Lower Spen Wildlife Area	Supports a mix of woodland, scrubland, meadow and wetland.	1.3 km northwest

5.1.3 The site is located within the Kirklees Wildlife Habitat Network (KWHN). The KWHN does not comprise a designated site but does meet the requirements of paragraph 179 of the 2021 National Planning Policy Framework (NPPF) for Conserving and enhancing the natural environment. Under the NPPF, local planning authorities should: 'identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping-stones that connect them'.

5.1.4 No ancient woodlands are present within 2 km of the site.

5.2 Habitats

5.2.1 The arrangement of site habitats is shown on the UK Habitat Classification plan in Appendix 3, whilst a full list of plant species recorded is provided in Appendix 4.

5.2.2 Site habitats are not considered to be of greater than site level importance to nature conservation.

5.2.3 A detailed description of the site and adjacent habitats is provided below.

<u>g4 – modified grassland</u>

5.2.4 Two different forms of modified grassland/ lawn were present on site.

5.2.5 Parcels of regularly mown lawn were present between the church and the surrounding footpath. Grassland in this area was close cut at the time of survey and comprised grass species including abundant red fescue *Festuca rubra* together with occasional Yorkshire fog *Holcus lanatus*. Herb species included abundant selfheal *Prunella vulgaris*, frequently occurring daisy *Bellis perennis*, creeping buttercup *Ranunculus repens* and dandelion *Taraxacum officinale* agg., and occasional white clover *Trifolium repens*. The moss species springy turf moss *Rhytidiadelphus squarrosus* was also abundant.

5.2.6 The grassland immediately surrounding the church building was assessed as being in moderate condition based upon the Condition Assessment Criteria stated in Biodiversity Metric 4.0 (Natural England, 2023). This grassland included 6-8 species per m^2, lacked scattered scrub, there was little physical damage evident and no bracken cover was present. This grassland did however have an even sward, bare ground was less than 1 % cover and the non-native invasive plant species montbretia was present at the edge of the grassland (TN 1, Appendix 3).

5.2.7 The second area of modified grassland comprised the area of habitat beneath the trees, on the embankment in the southeast corner of the site. Species present within this area of grassland included abundant cocksfoot *Dactylis glomerata* together with frequently occurring ivy *Hedera helix* and herb bennet Geum urbanum. Occasionally present within this grassland were ash *Fraxinus excelsior* saplings, nipplewort *Lapsana communis*, nettle *Urtica dioica*, creeping buttercup *Ranunculus repens* and cleavers *Galium aparine*.

5.2.8 Grassland beneath tree cover in the southeast corner of the site was assessed as being in poor condition based upon the Condition Assessment Criteria stated in Biodiversity Metric 4.0 (Natural England, 2023). The only condition criteria passed by this section of grassland related to the lack of scrub, bracken and invasive species, and the absence of physical damage. This area of grassland failed the other condition criteria, most notably the lack of species diversity between 6-8 species per m^2.

Plate 1. Grassland between the church and footpath, along the east elevation

Plate 2. Grassland over area graves bordering northwest corner of church

Plate 3. Grassland beneath trees at southeast corner of site

u1b5 - buildings

5.2.9 The large stone Grade II listed church (Church of Holy Innocents) comprised the only building on the site. This building was constructed in 1858 in a Gothic Revival style with solid ashlar-faced stone walls and multi-pitched Welsh slate covered roofs with stone ridge tiles and stone copings. The southwest end of the church comprised a square tower topped with a broach spire and supported by angled buttresses. Numerous openings, often supporting wooden louvres, were present in the tower. The central section of the church, comprised a taller nave with a dual pitched roof and two aisles with single pitched roof. An open-fronted and gated porch with a dual-pitched roof led into the southeastern aisle. At the northeastern end of the church was a chancel with a dual pitched roof and an adjoining sacristy with its own multi-pitched roof. All windows on the church were single-pane and leaded with protective covers in places. All doors were wooden.

5.2.10 The potential of the buildings to support roosting bats and nesting birds, together with notable aspects of its internal construction are considered in the species section of this report.

Plate 4. Eastern corner of church

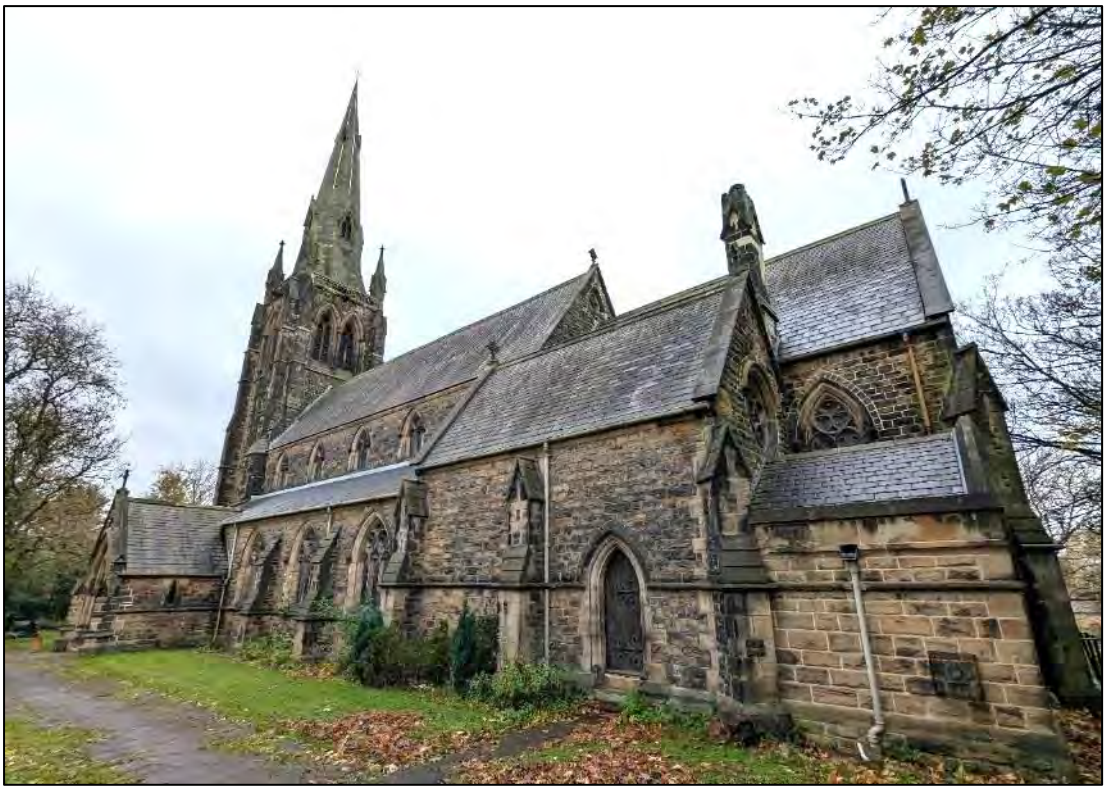


Plate 5. Northwest elevation of church

Plate 6. Church viewed from bridge over River Calder

u1b6 – other developed land

5.2.11 A tarmac covered footpath surrounded the church (Plate 1), with a connecting access path linking to Vicarage Road via the Grade II listed gate and gatepiers included in the perimeter wall (Plate 3).

32 – scattered trees (secondary code)

5.2.12 The site included two mature (medium size class) sycamore *Acer pseudoplatanus* trees, and a pair of mature (small size class) holly *Ilex aquifolium* trees/shrubs (Plate 3)(AVTC, 2023).

5.2.13 Trees were assessed against the Condition Assessment Criteria stated in Biodiversity Metric 4.0 (Natural England, 2023). The southern sycamore (T3 in the Arboricultural Impact Assessment (AVTC, 2023)), southern holly (T4) and nothern sycamore (T6) was considered to be in moderate condition. The northern holly (T5) was considered to be in good condotion.

Table 2. Trees considered against Biodiversity Metric 4.0 Condition Assessment Criteria

Criteria	Tree number (AVTC, 2023)			
	T3	T4	T5	T6
A. The tree is a native species1[1]	Yes	Yes	Yes	Yes
B. The tree canopy is predominantly continuous	Yes	No	Yes	No
C. The tree is mature	Yes	Yes	Yes	Yes
D. There is little or no evidence of advers impact on tree health	No	Yes	Yes	No
E. Natural ecological niches are present	No	No	No	No
F. More than 20 % canopy is oversailing vegetation	Yes	Yes	Yes	Yes
Number criteria passed and condition	4 (moderate)	4 (moderate)	5 (good)	3 (moderate)

828 – vegetated garden (secondary code)

5.2.14 Ornamental flower beds were present at the base of walls along much of the side elevations of the church (Plate 4). These beds showed a lack of recent management but continued to support a range of largely non-native species including frequent red valerian *Centranthus ruber* and occasional cypress *Cupressaceae*, primrose *Primula*, cranesbill *Geranium*, hebe *Hebe*, rose *Rosa* and bramble *Rubus fruticosus* agg..

5.3 Species and Species Groups

5.3.1 It was considered that locally important populations of birds and bats may be present in the surrounding area. Populations of other faunal groups were considered unlikely to be of greater than site level importance.

Amphibians

5.3.2 A single Great Crested Newt (GCN) record was received from WYE. This record was collected on an unknown date from a location 1.7 km northwest of the site. No former GCN mitigation licences, or GCN presence records included in either the Class Survey Licence Returns or 2017-2019 Pond Surveys datasets were identified for locations within 2 km of the site during the MAGIC search.

5.3.3 The pond search highlighted a single waterbody within 500 m of the site. This waterbody comprised a 2400 m^2 reservoir, located on the opposite side the River Calder, 380 m northwest of the site. The fast flowing section of the River Calder adjacent to the site (Plate 6) was considered to comprise a complete barrier to potential newt movement between this waterbody and the site. Given the lack of local records and any local ponds with connectivity to the site, GCN were not considered a potential receptor to the scheme.

5.3.4 A total of six palmate newt *Lissotriton helveticus* and seven smooth newt *Lissotriton vulgaris* records were provided by WYE. The closest of these records related to a site 1.7 km northwest of the site. Given the lack of local ponds with connectivity to the site,

[1] Though not strictly native sycamore is classed as being native in this instance due to time since introduction

populations of common amphibians, if present, were considered likely to be of no more than site level importance.

Badger

5.3.5 No badger *Meles meles* records were provided for locations within 200 m of the site by WYE, with the closest sett more than 750 m away. The site is however classed as falling within an area with an increased probability of badger activity.

5.3.6 No signs of badger presence were noted from the site. It is possible badger may use the site as part of a wider foraging area, if present locally.

Bats

Historic records

5.3.7 A total of 124 bat records were received from WYE. Species positively identified in these records included common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus,* brown long-eared bat *Plecotus auritus*, Daubenton's bat *Myotis daubentonii~~d~~,* Leisler's bat *Nyctalus leisleri* and noctule *Nyctalus noctula* with other records attributed either to an unidentified pipistrelle species or an unidentified species of bat. A single record attributed to serotine *Eptesicus serotinus*, almost certainly relates to a recording of a bat of a *Nyctalus* species due to the difficulty in separating these species acoustically and the commonly acknowledged range of serotine, which does not take in West Yorkshire. Two bat records located 89 m from the site comprise the closest bat records supplied. The first record related to a small Daubenton's bat roost (classed as a batchelor roost in the record), was recorded in 2005 from the bridge over the River Calder southwest of the church. The second record related to an unidentified pipistrelle field record, collected in 2012 from a location 89 m south of the site.

5.3.8 A total of 37 bat records were received from WYBG. Species positively identified in these records included common pipistrelle, brown long-eared bat and noctule, with other records ascribed to either an unidentified species of pipistrelle, or an unidentified bat species. The closest record was collected in 2005 from a location 340 m north of the site and related to a grounded pipistrelle bat.

5.3.9 One bat EPS mitigation licence has been issued for a location within 2 km of the site. In 2019 a licence was issued to permit destruction of a common pipistrelle resting place, located 1.4 km north of the site.

Building inspection

5.3.10 The exterior of the church is described in Section 5.2.9.

5.3.11 A variety of potential roost features were recorded from the exterior of the church. On the tower it was noted that mesh coverings over openings within the walls appeared to be intact and tight fitting, with the result that it seems unlikely bats could access the interior of the tower through these openings. Vertical gaps c. 5 cm wide were however noted between clock faces and masonry on both the northwest and southwest faces of the tower.

5.3.12 On the pitched roofs of the church potential roost locations included a gap beneath

flashing at the junction of southwest aisle roof and the adjoining wall. It was noted that bats could also potentially access wall tops and gaps were also noted between stone copings and adjacent slates. No missing slates were recorded and although slates were generally tight fitting, there was nevertheless a low number of suitable gaps between roof slates. No potential roost features were noted from the walls or windows of the church and potential access into the interior appeared restricted to flight access over the gates on the outside of the porch. It was however the case that the door from the porch into the nave, and the external door into the sacristy both appeared unlikely to be used as bat access points due to the lack of gaps of a suitable width between the doors and masonry surrounds. A door leading into a cellar/boiler room at the northeast end of the church was damaged, allowing potential bat access to the interior.

Plate 7. Gap beneath flashing at base of southwest aisle roof and wall, highlighted by red rectangle

Plate 8. Grill securing external opening of porch, allows potential bat access

5.3.13 The interior of the church was thoroughly inspected, including all three floors of the tower and the small cellar/boiler room at the northeast end. Within the interior of the broach spire numerous open joints were present between masonry blocks, with other roosting opportunities in the tower largely restricted to potential open roosting locations on walls and ceiling joists. It was however noted that openings in the walls of the tower appeared to be comprehensively mesh covered. No roof void was present in the nave with all pitched roofs lined with wood sarking. There were numerous potential roost locations at the tops of internal gables and potentially on roof trusses. Within the open-fronted porch, potential roost opportunities included a gap between the end truss and internal wall, whilst potential roost opportunities in the cellar were low in number and largely limited to the walls, with the area heavily cobwebbed. Despite a thorough search, no bat droppings, or other signs of bat presence were recorded from any location within either the interior or exterior of the church.

5.3.14 On the basis of building construction, age, location and the varied potential roost features present, the church was considered to display a high level of bat roost potential. In addition to the roost potential during the active period, the church also displays some potential for usage over the hibernation period. It was however not clear that bats could access either the interior of the church, or interior of the tower, with the boiler room lacking much suitability.

Plate 9. Interior of broach spire, with open joints between masonry blocks visible

Plate 10. Nave interior

Trees

5.3.15 Trees on site were considered to display no more than a negligible level of bat roost potential with no potential roost features noted.

Foraging habitat

5.3.16 It is expected that bats will forage in the open space between the walls of the church and adjacent tree cover. There is however little vegetative habitat included in the application area.

5.3.17 Locally important populations of bats may forage and commute over the River Calder and the wider grounds associated with Church of Holy Innocents.

Birds

5.3.18 A total of 54 records relating to 19 different bird species were provided by WYE. None of these records related to the site itself, with the closest record comprising a swallow nest observation in a location 292 m from the site.

5.3.19 Blackbird *Turdus merula* were recorded feeding around the church during the field survey. Blackbird are included on the green list of the Birds of Conservation Concern (Stanbury, 2021).

5.3.20 The site included little vegetative habitat other than the four trees. Whilst the building

and trees would be suitable for use by nesting birds, it is noted that openings in the church spire appear to have been effectively meshed to prevent bird access. Given the tight site boundary, it is considered unlikely to experience much use by foraging birds although the wider area supports extensive woodland and the River Calder and consequently it was considered likely to support bird populations of local value.

Hedgehog

5.3.21 A single hedgehog *Erinaceus europaeus* record was received from WYE. This record was collected in 2016 from a location 1 m from the site.

5.3.22 The site displayed potential for use by hedgehog, if present locally.

Invasive species

5.3.23 No records of invasive species, included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were received from WYE.

5.3.24 A small stand of montbretia, a plant species included on Schedule 9, was recorded to bordering the southwest wall of the porch (TN 1, Appendix 3).

Invertebrates

5.3.25 site supports a range of ubiquitous habitats of very limited extent and consequently rarely occurring invertebrate species are unlikely to be present.

Plants

5.3.26 The habitats present do not include long-established unimproved grasslands, ancient woodlands, species rich hedgerows or other diverse botanical communities. Therefore, protected or priority plants are unlikely to be present.

Reptiles

5.3.27 No reptile records were provided by WYE.

5.3.28 Given the location of the site in a sub-urban area with very restricted potential connectivity for reptiles beyond the bounds of the wider graveyard, reptiles were not considered a likely receptor to the proposed scheme.

Table 2. Ecological importance of each habitat, species or species group on site and adjacent

Habitat, Species or Species Group	Ecological value
g4 – modified grassland	Site
u1b5 - buildings	Site
u1b6 – other developed land	Site
32 – scattered trees (secondary code)	Site
828 – vegetated garden (secondary code)	Site
Amphibians	Site
Badger	Site (if present)
Bats	Local
Birds	Local
Hedgehog	Site (if present)
Invasive species	N/A
Invertebrates	Site
Plants	Site
Reptiles	Not likely receptor

5.4 Biodiversity Calculation

5.4.1 The existing site's value as calculated by the Biodiversity Metric 4.0 was 0.90 Habitat Units (Appendix 5).

6. Assessment

6.1 Proposals

6.1.1 It is proposed to undertake a residential conversion of Church of Holy Innocents with the church converted into two dwellings. The embankment supporting the four trees in the southern corner of the site will be excavated to create a new parking area. Land between the church and the path to the southeast of the church will be converted to domestic gardens. The graveyard at the northern corner of the church, located between the church and path, will be maintained, as will modified grassland bordering the buildings northwest elevation. New ornamental hedgerows will be created in association with small garden areas. Within the church itself, there is not anticipated to be any change to the tower beyond incorporation of the ground floor into the living space of a new dwelling.

6.2 Biodiversity Calculations

6.2.1 The Headline Results output of Metric 4.0 is presented in Appendix 5, based on the proposed site habitats shown in Appendix 6. The metric shows a net loss of 92.36 % of the existing Habitat Units (0.83 Habitat Units) with no change in Hedgerow Units.

6.2.2 In order to offset the habitat loss it is proposed to enhance existing habitats within areas of the graveyard outside the red-line boundary. These areas are shown in Figure 2. Enhancement proposals are expected to relate to an improvement in the condition of grassland in these areas and the planting of new trees. The detail of enhancement proposals is however awaiting a field survey of these areas.

Figure 2. Proposed enhancement areas, shown in green rectangles

6.3 Assessment of Impacts

Designated sites

6.3.1 The church is separated from the nearby Sparrow Wood LNR and LWS by a belt of residential housing, largely removing the scope for direct impacts upon the designated site during either conversion or occupation of the new dwellings. The presence of two new dwellings in this sub-urban area will not significantly impact visitor numbers to the designated site. For these reasons it is anticipated that negative scheme impacts upon designated sites will be at an insignificant level.

Habitats

6.3.2 Vegetative loss will be restricted to small areas of modified grassland and vegetated garden (flower beds) together with the loss of four trees. This habitat loss will be partially offset through the establishment of new lawn and shrub planting along the church's southeast elevation and the edges of the footpath onto the site.

6.3.3 The development has potential to result in damage to the root systems and possibly also the canopies of trees both on site and bordering the site.

Species

Bats

6.3.4 The church was considered to display high suitability for use by roosting bats with some potential for roost use throughout the year. The presence/absence of roosting bats has not yet been determined with any confidence. In the absence of mitigation and potentially also a licence from Natural England, it is possible that the proposed development would result in offences in relation to bats (i.e. destruction or modification of a bat roost/s and/or killing or injuring of bats). Bat roosts are subject to legal protection whether in use or not (Appendix 1).

6.3.5 Regardless of the presence/absence of roosting bats it was considered likely that the habitats surrounding the church would be well used by foraging bats. There is potential for the residential re-development of this site to result in an increase in artificial lighting to the detriment of bat species currently using the site for foraging and commuting.

Birds

6.3.6 The church and the trees to be felled both have suitability for nesting. If these works take place during the bird nesting period (March to August inclusive), then they could result in the destruction of active nests. Birds are subject to legal protection when actively nesting (Appendix 1).

Invasive species

6.3.7 The development has potential to result in the spread of the invasive plant species montbretia either on site, or in an off-site location.

Other species

6.3.8 No additional significant impacts are anticipated to other species.

6.4 Further Survey, Mitigation and Enhancement

Habitats

6.4.1 Given the extent of habitat within the red-line boundary there is limited potential to offset scheme impacts within this area. It is however recommended that new dwelling boundary hedges comprise a native woody species (i.e. yew, holly, beech or hornbeam).

6.4.2 British Standard 5837 (2012): Trees in relation to design, demolition and construction, should be followed. Root Protection Zones (RPZ's) should be calculated and implemented to prevent harm to trees near the boundary. This should also apply to any trees out-with the site, up to 5 m from the boundary.

6.4.3 Habitat enhancement proposals are being developed for land within the wider graveyard (Figure 2) with the focus on enabling the wider scheme to deliver a biodiversity net gain, once these enhancements are taken into account.

Species

Bats

6.4.4 In order to confidently determine bat roost presence/absence, three nocturnal survey visits should be undertaken during the bat activity period (peak-period: May to August). These survey visits should comprise dusk emergence surveys led by a licensed surveyor and undertaken using night vision aids. Survey visits should be spaced at least three weeks apart.

6.4.5 The potential for bats to use the church during the winter hibernation period is limited by a likely lack of bat access into either the interior of the tower or the main body of the church. It is nevertheless recommended that a single visual inspection is undertaken during January/February 2024 by a licensed bat surveyor.

6.4.6 The requirement for licensing and/or mitigation cannot be confidently determined until the results of further bat survey works are known.

6.4.7 An ecologically sensitive external lighting plan should be developed for the site. Artificial lighting has been shown to restrict the range of bat species that may use an area, as well as disrupting the ecology of other nocturnal species (i.e. moths). The lighting plan should look to restrict external lighting to the minimum level necessary. Use of passive infra-red sensor operation triggered lighting on a relatively short timer is recommended in order to reduce time of operation. Where lighting is necessary, it is advised that lighting is low height, low output, directional and of a warm colour tone.

Birds

6.4.8 Tree felling and the commencement of external works on the church should either take place at a time when they would not be expected to affect nesting birds (outside March to August), or they should be preceded by a nesting bird check, to be undertaken by an ecologist.

6.4.9 The tower contains several openings into the floor housing the bells and within the broach spire itself. These openings were meshed at the time of survey but would

provide highly suitable locations within which swift *Apus apus* boxes could be fitted, were the design of the mesh first altered. Guidelines for installing swift nest boxes in church belfries are included in Appendix 7.

Invasive species

6.4.10 The existing specimens of montbretia should be hand pulled, making sure to remove the corms (similar to bulbs) and underground stems. The excavated material may then either be buried on site, in accordance with Regulatory Position Statement 178 (https://www.gov.uk/government/publications/treatment-and-disposal-of-invasive-non-native-plants-rps-178/treatment-and-disposal-of-invasive-non-native-plants-rps-178), or removed from site by a licensed waste disposal contractor. The contractor should be notified of the Schedule 9 species that they are transporting.

6.4.11 No plants listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) should be included in the new planting plan for the site.

6.5 Conclusion

6.5.1 The presence/absence of roosting bats within the church has not yet been confidently determined with further hibernation and summer activity survey required. Scheme impacts are not however anticipated to be of significance to the wider cause of nature conservation, including any non-bat species at greater than the site level.

6.5.2 The scheme will result in a large percentage biodiversity net loss (although a modest loss in terms of Habitat Units) within the red-line boundary. There is however scope to offset this through enhancement of habitat within the wider graveyard.

6.5.3 The results of this survey are considered to be valid for a period of 24 months. After this time Middleton Bell Ecology should be contacted to determine the need for update survey.

7. References

AVTC (2023) Church of The Holy Innocents – Pre Development Arboricultural Impact Assessment. Aire Valley Tree Consultants Ltd.

Collins J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition. The Bat Conservation Trust.

CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

Natural England (2023) The Biodiversity Metric 4.0 User Guide. Natural England.

UKHab Ltd (2023) UK Habitat Classification Version 2.0 (at https://www.ukhab.org)

Stanbury A, Eaton M, Aebischer N, Balmer D, Brown A, Douse A, Lindley P, McCulloch N, Noble D & I Win (2021) The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114, 723–747.

Appendix 1. Relevant Legislation and Planning Policy

Wildlife legislation relating to statutory designated sites and species is summarised in Table A1 and A2 below. This legal information is intended for summary only, and the original legal documents should be consulted if a detailed understanding is required.

Table A1. Legislation relating to designated sites and habitats

Designated Site	Legal Status
Local Wildlife Site (LWS)	While they have no direct legal status, Local Wildlife Sites are considered important enough to receive recognition within the planning system. National planning policy requires local authorities to identify Local Wildlife Sites and provide for their protection through local policy.

Table A2. Legislation relating to species

Species	Legal Status
European protection	
European Protected Species (EPS) (including bats, Great Crested Newt (GCN), otter and hazel dormouse)	These animal species and their breeding sites or resting places are protected under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which makes it illegal to: • Intentionally or deliberately capture, injure or kill any such animal or to deliberately take or destroy their eggs. • Deliberately disturb such an animal. • Damage or destroy a breeding site or resting place of such an animal. European Protected Species (EPS) licences can be granted by Natural England in respect of development to permit activities that would otherwise be unlawful under the Conservation Regulations, providing that the following 3 tests (set out in the EC Habitats Directive) are passed: • The development is for reasons of overriding public interest. • There is no satisfactory alternative; and • The favourable conservation status of the species concerned will be maintained and/or enhanced. Under Regulation 9(5) of the Conservation Regulations, Planning Authorities have a legal duty to 'have regard to the requirements of the EC Habitats Directive in the exercise of their functions'. This means that they must consider the above 3 tests when determining whether Planning Permission should be granted for developments likely to cause an offence under the Conservation Regulations. As a consequence, Planning Applications for such developments must demonstrate that the 3 tests will be passed. Natural England also allow sites to be registered on the Bat Low Impact Class Licence to permit activities that would otherwise be unlawful under the Conservation Regulations where the 3 tests can be passed and the bat roosts to be impacted are of low conservation status.
National protection	

Species	Legal Status
European Protected Species and other species including water vole and white clawed crayfish	These animals receive full protection under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000), which makes it illegal (subject to exceptions) to: • Intentionally kill, injure or take any such animal. • Intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any such animal; and • Intentionally or recklessly disturb such animals while they occupy a place used for shelter or protection.
Common reptile species	These animals receive limited protection under The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000), which makes it illegal to intentionally kill or injure any such animal.
Badger	The Protection of Badgers Act 1992 makes it illegal to wilfully kill or injure a Badger or attempt to do so and also make it illegal to intentionally or recklessly interfere with a Badger sett. This includes damaging or destroying a sett, obstructing access to a sett and disturbing a Badger while it is occupying a sett. Licences can be granted by Natural England to permit sett closure and/or disturbance between July and November inclusive.
Schedule 1 birds	Special penalties relate to offences concerning birds listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). In addition to the offences detailed above relating to all wild birds, it is illegal to intentionally or recklessly disturb any Schedule 1 bird or their dependent young while nesting.
All bird species	All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000), which makes it illegal (subject to exceptions) to: • Intentionally kill, injure or take any wild bird. • Take, damage or destroy the nest (whilst being built or in use) or eggs of any wild bird.
Invasive species	The Wildlife and Countryside Act 1981 (as amended) contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 of the Act. In relation to Schedule 9 plants, it is an offence to plant or otherwise cause these plant species to grow in the wild.

Species and Habitats of Principal Importance

Planning authorities have a duty under Section 40 of the NERC Act 2006 to have regard to priority species and habitats in exercising their functions including development control and planning. In compliance with Section 41 of the NERC Act, the Secretary of State has published a list of species and habitats considered to be of principal importance for conserving biodiversity in England under the UK Post-2010 Biodiversity Framework. This is known as the list of Habitats and Species of Principal Importance (HPI/SPI). The HPI/SPI list is used to guide planning authorities in implementing their duty under the NERC Act.

National Planning Policy Framework

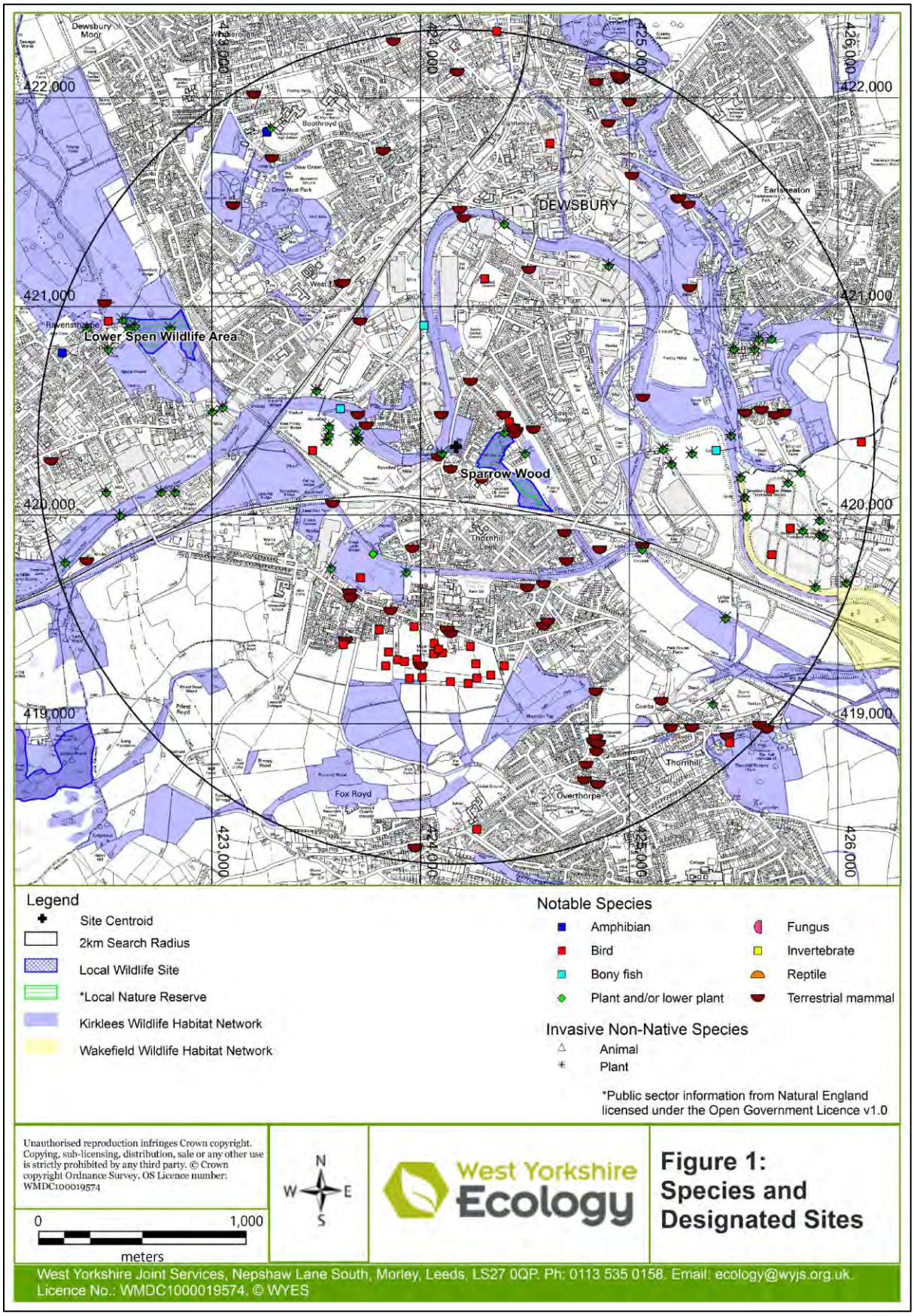
The National Planning Policy Framework for England was revised in 2021. This document states that plans should ‘promote the conservation, restoration and re-creation of priority

habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'. It also puts an emphasis on refusing development which would result in the 'loss or deterioration of irreplaceable habitats (such as ancient woodland)' unless there are 'wholly exceptional reasons and a suitable mitigation strategy exists'.

Local Biodiversity Action Plans

The HPI/SPI list included on Section 41 of the NERC Act 2006 is supported by a series of Local Biodiversity Action Plans (LBAPs), usually set up on a local authority local authority administrative boundary basis. Each LBAP identifies those habitats and species considered to be most important in that area (usually referred to as priority habitats and species). Commonly, an LBAP will identify a number of habitats and species for which "action plans" have been prepared.

Appendix 2. Designated Sites Plan



Appendix 3. UK Habitat Classification Plan

Survey Information	
	Site boundary (1,245.4m^2)
UK Habitat Survey (Primary Habitats)	
	g4 - Modified grassland, moderate (168.4m^2)
	g4 - Modified grassland, poor (209.6m^2)
	u1b5 - Buildings (496.9m^2)
	u1b6 - Other developed land (329.0m^2)
	828 - Vegetated garden (33.2m^2)
	853 - Mortared wall (14.2m)
	32 - Scattered trees (4)
	Target note

Secondary codes:

90 - Cemeteries and churchyards

Target notes:

1 - Stand of montbretia (included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended))

Source:
Ordnance Survey © Crown copyright 2023, All rights reserved. License Number 100049837.

N

0 2.5 5 10
Metres

PROJECT TITLE

CHURCH OF THE HOLY INNOCENTS

DRAWING TITLE

Figure 1. UK Habitat Survey Plan

VER	DATE	REMARKS	Drawn	Checked
1.1	05/12/23	UKHab	MP	RB

DRAWING NUMBER:
MIDDLETONBELLECOLOGY/ChurchHolyInnocents/UKHab

SCALE	1:325	PLOT SIZE	A3	DATUM	OSGB	PROJECTION	BNG

Middleton Bell Ecology
33 Wilthorpe Road, Barnsley, South Yorkshire, S75 1JA
www.middletonbellecology.co.uk
T: 01226 286282

Appendix 4. Plant Species Recorded on Site

D = Dominant, **A** = Abundant, **F** = Frequent, **O** = Occasional, **R** = Rare

Common name	Latin name	g4 - modified grassland	32 – scattered trees (secondary code)	828 – vegetated garden (secondary code)
Ash	*Fraxinus excelsior*	O		
Bramble	*Rubus fruticosus agg.*			O
Cleavers	*Galium aparine*	O		
Cock's-foot	*Dactylis glomerata*	A		
Common Nettle	*Urtica dioica*	O		
Creeping Buttercup	*Ranunculus repens*	F		
Cypress	*Cupressaceae*			O
Daisy	*Bellis perennis*	F		
Dandelion	*Taraxacum officinale agg.*	F		
Geranium	*Geranium*			O
Hebe	*Hebe*			O
Herb Bennet	*Geum urbanum*	F		
Holly	*Ilex aquifolium*		A	
Ivy	*Hedera helix*	F		
Montbretia	*Crocosmia pottsii x aurea = C. x crocosmiiflora*	R		
Nipplewort	*Lapsana communis*	O		
Primrose	*Primula*			
Red Fescue	*Festuca rubra*	A		
Red Valerian	*Centranthus ruber*			F
Rose	*Rosa*			O
Selfheal	*Prunella vulgaris*	A		
Springy Turf-moss	*Rhytidiadelphus squarrosus*	A		
Sycamore	*Acer pseudoplatanus*		A	
White Clover	*Trifolium repens*	O		
Yorkshire-fog	*Holcus lanatus*	O		

Appendix 5. Biodiversity Metric 4.0 Headline Results

Church of Holy Innocents

Headline Results

Scroll down for final results ⚠

Return to results menu

On-site baseline	*Habitat units*	0.90	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	*Habitat units*	0.07	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	*Habitat units*	-0.83	-92.36%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%

Appendix 6. Proposed Site Habitat Plan Converted For Metric Input

Survey Information	
	Site boundary (1,245.4m^2)
UK Habitat Survey (Primary Habitats)	
	g4 - Modified grassland (82.7m^2)
	u1b5 - Buildings (496.9m^2)
	u1b6 - Other developed land (526.7m^2)
	828 - Vegetated garden (139.1m^2)
	853 - Mortared wall (14.2m)

Source:
Ordnance Survey © Crown copyright 2023, All rights reserved. License Number 100049837.

N

0 2.5 5 10
Metres

PROJECT TITLE

CHURCH OF THE HOLY INNOCENTS

DRAWING TITLE

Figure 2. Proposed Plan

VER	DATE	REMARKS	Drawn	Checked
1.0	04/12/23	Proposed	MP	RB

DRAWING NUMBER:
MIDDLETONBELLECOLOGY/ChurchHolyInnocents/Proposed

SCALE	PLOT SIZE	DATUM	PROJECTION
1:325	A3	OSGB	BNG

Middleton Bell Ecology
33 Wilthorpe Road, Barnsley, South Yorkshire, S75 1JA
www.middletonbellecology.co.uk
T: 01226 286282

Appendix 7. Guidelines For Installing Swift Nest boxes in Church Belfries

Guidelines for installing Swift nest boxes in church belfries

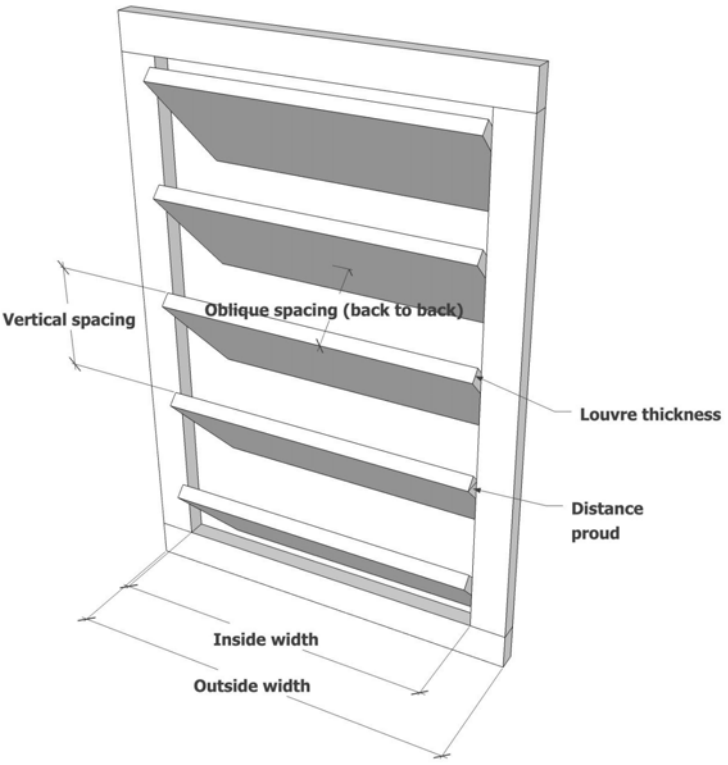
Nest boxes in church belfries have proved to be very successful, resulting in some substantial new colonies. There are about 16,000 churches and chapels in England, many with a suitable belfry. So there is an opportunity to make a significant contribution to halt the decline of Swifts.

The advantages of church belfries are that they are high, out of the way, and Swifts seem to like nesting there. One of the things that Swifts like is a degree of seclusion. The louvres in front of a Swift box in the belfry provide this.

Getting a church project started

The prerequisites for embarking on a project like this are a team with energy and enthusiasm as well as a sympathetic vicar, bell captain, church wardens and Parochial Church Council (PCC).

The first thing to do is to visit the belfry to check that such a project is feasible. An exploratory visit should only require the permission of a church warden or vicar. If basic measurements, and photographs (with flash) can be obtained, then custom boxes can be designed and these designs incorporated in a submission to the PCC.



The illustration right shows which measurements are needed. Although louvres are usually equally spaced it is a good idea to check this by measuring every individual louvre spacing. The direction in which the louvres face is not an issue, as, even on a south facing aspect, the boxes will not overheat.

Getting Permission

There was a time that, provided certain common sense rules were obeyed, swift boxes could be regarded as *de minimis*, and approval by the PCC would be sufficient. The ‘common sense’ rules include no interference with bell ringing, no screws into ancient stonework,

though stainless screws into mortar between stones is acceptable, and no impact on the external appearance of the church.

Following a period when a faculty was required, in April 2020 the rules changed so that bird boxes have been added to ‘List B’. This means that, in addition to the agreement of the PCC, the archdeacon needs to be consulted to decide whether a faculty is needed. The archdeacon should give notice in writing that the matter may be undertaken without a faculty. The archdeacon may impose additional conditions in the written notice.

In making your case, you can say that Swifts are declining at 5% per annum, they are classified as 'Endangered'. They make a fantastic show in the summer screaming around the church tower. Unlike some species that nest in buildings, they make little or no mess. However, it may take 2 or 3 years to attract the first swifts.

Costs
Provided the boxes can be designed, constructed and installed by volunteers, costs can be kept down. The carpentry involved is not difficult. A small project, say 8 boxes behind one set of louvres would cost less than £100 for materials.

Nest box design
Most experience has been with tailor-made box-shaped cabinets, containing multiple nest chambers. Typically, the floor of each nest chamber is between 350 sq cm and 500 sq cm with a height determined by the spacing between the louvres. The internal height should be more than 8.5cm, ideally above 10cm.

Most louvres are wide enough (often about 45cm) to accommodate 2 boxes side by side. The entrance should be 65-75mm x 28mm positioned near the floor of the nest chamber and towards the side. Entrances can be positioned anywhere in the gaps between louvres. A good idea is to make cardboard templates of your design to test fit before cutting any plywood.

Frequently there are wooden battens surrounding the louvres that can be used to support the boxes. Should there be no wooden battens, then you can either install battens with stainless screws into mortar (not into stonework) or with bracing bars spanning the reveals.

Swifts prefer nest boxes containing a nest platform which can be as simple as an 85mm hole in a 12 cm square of 9mm or 12mm plywood glued to the floor at the furthest corner from the entrance..

Access for inspection can either be carried out after the end of the breeding season by removing the whole back, or with simple access doors.

Netting
Most belfries have wire mesh netting on the inside to exclude starlings and pigeons. Either the netting can be replaced with Swift boxes, or holes can be cut aligned with every nest chamber entrance. Cut 3 sides of a rectangle about 10cm x 7cm then fold the rectangle

inwards about the bottom uncut side. With deep louvres it may help the Swifts if a small tunnel is added outside the netting in front of the entrances. After installing nest boxes, ensure that Swifts and other wildlife are excluded from all sides of the belfry.

Examples:

St Mary's Newmarket

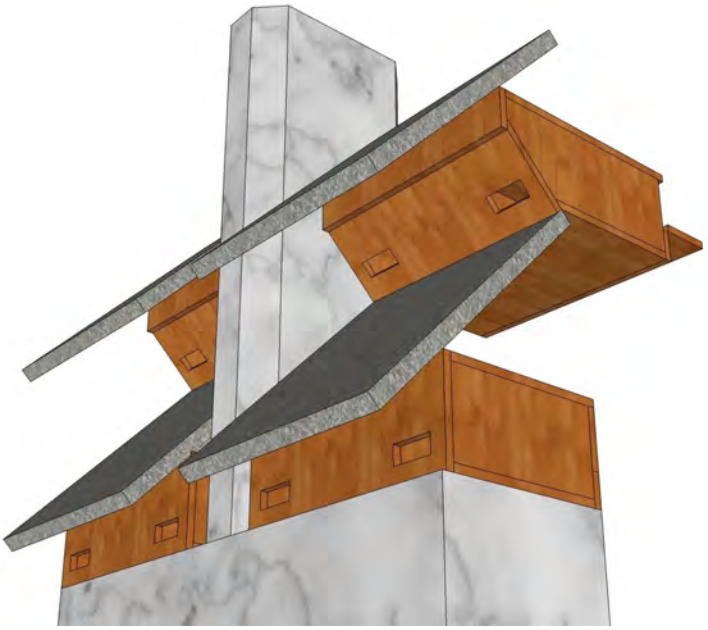
Battens each side of the louvres are far enough apart (about 50cm) to support 2 columns of nest boxes. The height of the boxes is dictated by the louvre spacing. Access doors with a hinge and simple catch are for inspection and simple maintenance. Swifts tend to prefer the higher louvres, so these boxes occupy the top 4 louvres.

The single box on top takes advantage of an entrance at the top most point of the opening.

St Mary the Virgin, Santon Downham

This belfry has wide louvres allowing 3 boxes across the width of the opening. Rather than building 1 large cabinet, it was implemented as 3 cabinets of 3 boxes each. This made installation more manageable.

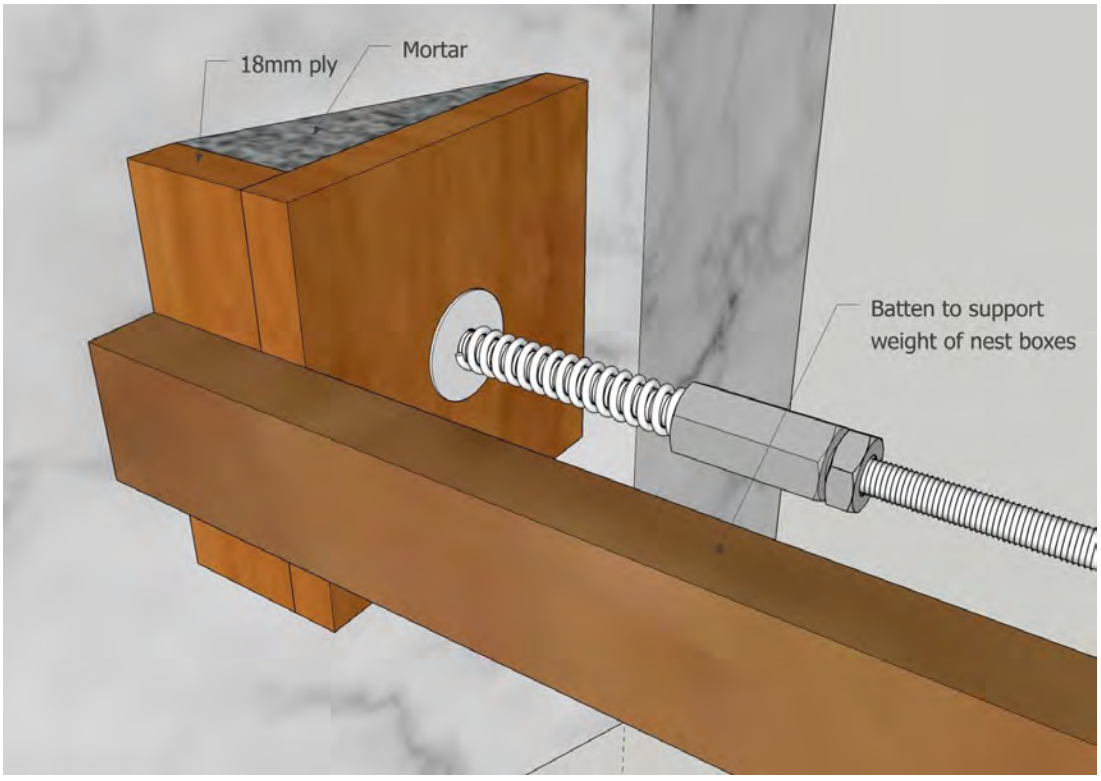
Deep louvres
Sometimes with deep and irregular louvres, a single cabinet is not appropriate. This is one way that swift boxes could be implemented in such a situation.



Special situations
Some belfries are not louvred, in which case some creativity may be needed. St John's Bury St Edmunds has a kind of trellis in each opening. These model drawings show what was implemented with small canopies indicating the position of nest box entrances. This has proved to be very successful with over 20 pairs of Swifts in 60 boxes.

No battens?

If there are no battens at the sides of the louvres and it is not practical to fit any, then a bracing bar could be the solution. The spring and tightening nut is only needed at one end of the bracing bar.



Attraction calls
Playing attraction calls will increase the chances of success and reduce the time taken to attract the first occupants. For this reason there must be an accessible power socket with a way to route speaker cable to a tweeter near the nest boxes. Make sure that all sides of the belfry are Swift-proof before starting to play calls.

Frequently asked questions
Q: Will Swift boxes dampen the sound of the bells?
A: As Swift boxes usually do not cover all of the louvres and as they are normally made of 12 mm plywood, attenuation of the sound of the bells is minimal.

Q: Can you see the boxes from outside the church?
A: If a dark stain is applied to the boxes, then they are virtually invisible from outside the church. The external appearance of the church will not be affected.

Q: Will Swift boxes allow bats or other wildlife to enter the church?
A: As the nest boxes are sealed on the inside, no wildlife can get into the church.

Q: Do Swift droppings foul the church?
A: Unlike Starlings and House Martins, Swifts do not produce large amounts of 'white-wash'. Swifts are clean birds, the adults consume the chicks droppings, and very little in the way of droppings would be produced outside.

Q: Do boxes need to be cleaned out at the end of the season?
A: Swifts use minimal nesting material. Invertebrates reduce the material through the winter. It is not necessary, indeed it is bad practice, to clear a Swift's nest at the end of the breeding season, they need it for breeding the following year. However, if tits or sparrows have occupied the box, then it is a good idea to clear it out outside the breeding season.

Q: Does playing attraction calls disturb neighbours?
A: As the belfry is so high, most people do not even notice it and the calls will cease when the colony is established .

Q: Are Swifts affected by bell-ringing?
A: Swifts have been observed on video being momentarily startled when bells start to ring, they then soon settle down. Often they do not react at all.

Case studies
For examples of details of church projects and other stuff about Swifts and churches see actionforswifts.blogspot.co.uk/search/label/churches

Action for Swifts, April 2020
actionsforswifts.blogspot.com
actionforswifts@gmail.com

THE CHURCH OF ENGLAND

CHURCH COMMISSIONERS

By email only to

Edward Cheseldine

Edward.Cheseldine@kirklees.gov.uk

Emma Cosgrif
Case Officer
Pastoral and Closed Churches

Based at:
17-19 York Place
Leeds
LS1 2EX
Tel: 0113 3530269

Your ref: 2023/92128, 2023/92129
Our ref: RC46/248
24 November 2023

Dear Edward

Mission and Pastoral Measure 2011
Closed Church of Thornhill Lees Holy Innocents
Proposed Conversion to Residential Use

We understand that Kirklees Council have asked for some additional supporting information to aid their assessment of application No's 2023/92128 and 2023/92129.

Please note that the appropriation of the building to residential use is subject to the completion of the statutory processes under the Misson and Pastoral Measure 2011 and will be subject to a further period of public consultation undertaken by the Church Commissioners. The comments in this letter are given by officers without prejudice to the outcome of this process, nevertheless I hope they are of assistance.

Background to the Closure

The closure of a church building is subject to statutory process of public consultation under the provisions of the Mission and Pastoral Measure 2011. Church of England Measures are pieces of ecclesiastical legislation that have the same legal status as an Act of Parliament. Any representations regarding the proposed closure are adjudicated on by the Church Commissioners Misson, Pastoral and Church Property Committee which is made up of lay and ordained people from across the Church of England (and a representative of DCMS). With the leave of the Judicial Committee of the Privy Council, any person who has duly made written representations with respect to the draft scheme may also appeal to His Majesty in Council against the scheme or any provisions thereof.

In short, therefore, it is a robust judicial procedure.

The formal process to close the church of Thornhill Lees Holy Innocents for regular public worship was initiated by the Parochial Church Council (PCC) of the parish in 2018 after ongoing discussions spanning several years. The PCC initially voted to pursue closure in September 2010. However, the first scheme was withdrawn in September 2012 due to concerns about the future ownership of the large open churchyard. Despite efforts between 2012 and 2018, ongoing maintenance and repairs remained challenging, coupled with a decline in attendance numbers. Consequently, the decision to pursue closure was made again in 2018.

The small and aging congregation had been dwindling for years and faced difficulties in maintaining a large building with significant maintenance needs. Furthermore, by this time the local community predominantly belonged to a different faith group. Financially, the PCC found it unsustainable to continue supporting the building. Hence, closure was reluctantly sought after extensive deliberation.

The 2014 Quinquennial Inspection highlighted the urgent need for substantial repairs, especially to the north-facing roofs and spire, estimated at around £400,000 – £450,000. Recognising their limitations in both human and financial resources, the PCC concluded that such a project was unfeasible. Additionally, they believed that even with repairs, the building would lack a sizable worshiping community to justify its continued operation. Consultation on the closure started on 1 August 2018 and the church was formally closed on 1 October 2019.

Consultation took place with the usual “interested parties”, this phrase has a legal definition under the Measure and includes the Archdeacon, Area Dean, Deanery Synod Lay Chair, PCCs of both Thornhill Lees and Ravensthorpe, and Local Authority Planning Authority. They all received a copy of the draft proposals and a covering letter on 1 August 2018 to which they all responded, none raising objections.

This local process of consultation is followed by a statutory period of public consultation undertaken by the Church Commissioners, who are the national church institution responsible for overseeing the process. The “interested parties” were consulted again when a formal draft closure scheme was published on 24 April 2019. This second consultation was also open to the general public and advertised in a similar to the way in which local authorities publicise planning applications.

No representations were received against the draft closure scheme. This public consultation can often flush out alternative community uses, or those with an interest in the future use of the building, however nobody expressed any interest in alternative uses.

Formal Disposal Process

Following closure, the advice of professional property agents was sought, and the building was placed on the open market. Churches that have been closed pursuant to a scheme under the Mission and Pastoral Measure 2011 are exempt from the usual Charity Act requirement to seek “best value”, the legislation instead requires a “suitable new use” to be

found, with suitability being judged in the context of the special nature of consecrated buildings.

The Mission and Pastoral Measure 2011 also governs the process for settling the future of church buildings once they have closed. Upon closure the building (but not the churchyard) vested in the Leeds Diocesan Board of Finance (DBF) for care and maintenance. Since closure the DBF has been working with the Church Commissioners to settle the future of the building. The legislation requires that this ideally been done within a two-year time period. After a new use has been identified the Church Commissioners prepare a Pastoral (Church Buildings Disposal) Scheme setting out the proposals and publish this for another public consultation. Should any objections be received the Church Commissioners Misson Pastoral and Church Property Committee would decide whether or not the scheme, and hence the proposed future use, should go ahead. To ensure the proposed future use is implementable, the Commissioners will not complete the sale of a closed church building until all necessary secular consent have been granted and due diligence has been undertaken on the financial viability of the development.

The Mission and Pastoral Measure 2011 permits only 3 possible outcomes for closed church building:

1. Disposal for a new use;
2. Vesting in the Churches Conservation Trust (CCT);
3. Demolition

The Church of England's statutory advisors, the Church Buildings Council have advised that Holy Innocents is not of sufficient architectural or historical interest to warrant vesting in the CCT and therefore a new use must be found if demolition is to be avoided.

On closure the "ecclesiastical exemption" from listed building control ceases to apply and the building becomes subject to both the Faculty System and listed building consent. However, for Church of England buildings that are closed for regular public worship total demolition in pursuance of a scheme under the Mission and Pastoral Measure 2011 is exempt from;

1. Planning control by virtue of Schedule 2 Part 11, Class B of the Town and Country Planning General Permitted Development Order 2015;
2. The normal prior approval requirements of Schedule 2 Part 11, Class B.2 (b) of the 2015 Order because demolition carried out under the authority of a scheme made under the Mission and Pastoral Measure 2011 is an excluded demolition by virtue of Schedule 2 Part 11, Class B.3 (d) of the 2015 order;
3. Listed building control by virtue of section 60(7) of the Planning (Listed Building and Conservation Areas Act) 1990

The Church of England aims to ensure that heritage assets that are no longer required for their original purpose remain in active use consistent with their conservation to prevent neglect and decay and to secure their long-term future. This give scope for the consideration of any sensible proposals for a "suitable" new use from an individual or group that could demonstrate that they had sufficient funding for the initial redevelopment, and to provide for ongoing maintenance, and the exemption from charity law means low offers can

be accepted where this is deemed appropriate, particularly for uses that have benefits that align with the values of the Church of England.

Marketing and Options Appraisal

Attached is a summary report from the agent that details the marketing exercise undertaken, the number of enquiries and viewings and the type of offers received. This has been anonymised for GDPR purposes. It should be noted that whilst the property is marked as "under offer" it remains on the agent's website, where the sales brochure can be viewed;

https://www.walkersingleton.co.uk/commercial/holy-innocents-church-vicarage-road-wf12-9pd/

As the agent notes, the use-finding exercise resulted in "less than a handful" of enquiries for uses other than residential conversion proposals and **none** that were economically viable or had the necessary funds or wherewithal to take on the huge challenges posed by this large, resource-hungry, Grade II Listed building. All interest for uses other than residential faded away once questions around funding and viability were asked. The offer that has formed the basis for the current planning and LBC applications being the **only** fully evidenced proposal received.

The agent has noted that sheer scale of the building deterred many, and that the lack of available car parking, both within the site and in the immediate vicinity, proved to be a significant drawback.

The LPA has asked;

- What options for reuse of the church have been considered?
- Has any split use been considered?
- Have any meanwhile uses been considered for the church since its closure?

Once a church has been closed for regular worship the DBF and the Church Commissioners are required by law to make every effort to find a suitable new use. By the very nature of the fact that they are no longer required for the furtherance of the mission of the Church of England, finding a new use means finding a new lessor or owner. Therefore, options can only be considered when someone steps forward to propose them. A "good idea" is not enough, it must be a good idea with an individual or body with the means to implement it. No other viable options, other than residential conversion, have been received.

Split use would have been considered had anyone shown an interest, which they did not.

Under the provisions of s61 of the M&P Measure 2011 the only permissible use during the use seeking period is occasional Christian worship, including worship by persons belonging to other Christian Churches. No group expressed an interested in using the building for worship.

General Comments on the Residential Use of Closed Church Buildings

In 1968 the Mission and Pastoral Measure bought new arrangements into force to manage the closure of church buildings and facilitate their re-use. In July 2020 the Church Commissioners Pastoral & Closed Churches Division undertook a detailed analysis of their data collection relating to the disposal of 1,972 churches that had been closed during this time period. Closed churches are sold for a specific use, and the use is restricted by covenants that attach to the building in perpetuity, meaning a deed of variation is required in order to permit an alternative use, even many years after the initial disposal, allowing the Commissioners to track the success of different use categories. The analysis found that;

- 57% of closed buildings had been put to an alternative use.
- 18% had been "preserved" (primarily by vesting in the Churches Conservation Trust):
- 21% had been demolished.
- 4% had been restored to uses as Anglican churches or places of worship of Compulsory Purchased or enfranchised.

Of the 57%, or 1,081 closed churches whose latest authorised future is "alternative" by some distance, the most common use category in numerical terms was residential. This use had also gained the most buildings from other used that had failed.

Residential use has proved a very successful use category provided that the use has been fully implemented and has not failed in its early stages due to the new owner's lack of funding. At the time of the analysis in 2020 76% currently in this use category had only ever been in residential use, with a another 24% joining the residential use class from a differing use subsection, making residential use the most likely outcome where the initial use had failed.

Cultural and community uses such as arts, crafts, music and drama emerged as one of the most volatile in terms of the proportion for which this was, but is no longer, the authorised use. Among buildings where this remains the sole authorised use, there are several which seem to be operating successfully, including use as arts centres, craft workshops and theatres, although such operating models can be precarious, and several closed during the Covid-19 crisis, raising fresh concerns about their future sustainability.

The analysis concluded that residential use is the most sustainable approach and one of the most successful uses for a closed church building.

I trust that this provides some useful information to the local planning authority to aid its consideration of the current planning and listed building consent applications in the context of the unique legal and ethical considerations that pertain to closed Anglican churches.

Specific questions regarding the number of proposed bedrooms, the level of subdivision etc etc are for the applicant to answer, however I enclose the advice on plans received from the Statutory Advisory Committee on closed and closing churches, who advise the Church Commissioners and the Churches Conservation Trust on behalf of the Church Buildings Council, on heritage and architectural matters relating to closed church buildings.

Yours sincerely

Emma Cosgrif
MSc BSc MRTPI

Statutory Advisory Committee
on closed and closing churches advising the Church Commissioners
and the Churches Conservation Trust on behalf of the

Church Buildings Council

Clare Chapman
Assistant Case Officer
Closed Churches Division
Church Commissioners for England

Claire Smith
Church Buildings Officer

By email

12th October 2023

Dear Clare

Thornhill Lees, Holy Innocents (Diocese of Leeds)
Advice on plans: proposed conversion to two dwellings

Thank you for seeking the Statutory Advice Committee's views on the proposal for conversion to residential use. The advice in this letter is given under the Committee's delegated advice policy.

The SAC welcomes this sensitive scheme for residential conversion of Holy Innocents, which is an attractive and impressive work by James Mallinson and Thomas Healey senior. The church is unaltered, in architectural terms, and retains its suite of original furnishings, the principal items designed by Healey. The provision of two dwellings requires some, but not overly extensive, subdivision, and the SAC is pleased that the design is carefully considered to minimise harm to the listed building.

When the SAC last saw this case in 2019, a quinquennial inspection report estimated over £400,000 of repair work, including a project to address the condition of the north-facing roofs, the tower and spire. The SAC is pleased to see reports from a steeplejack, architect and structural engineer. These provide a clearer understanding of the repair works necessary and reduce the feeling of immediate urgency attached to the spire repair. The current proposal makes no mention of repair work, with the plans stating that there will be no work to the tower or spire. The SAC understands that a developer may wish to test whether permissions would be granted for conversion in advance of investing further in the building, and that repair work would not necessarily be included in the proposals should they not require listed building consent. It should be noted that repair and maintenance, of both the spire and the south roof, would be a substantial part of the project to secure the future of the building.

Limited alterations are proposed externally. The proposal seeks to retain the stained glass and replace the window guards. Advice on the considerations for fitting window

Cathedral and Church Buildings Division, Archbishops' Council,
Church House, Great Smith Street, London SW1P 3AZ

Direct line: 020 7898 1640 claire.smith@churchofengland.org

www.churchcare.co.uk

guards can be found in the guidance on conservation of stained glass. The insertion of so many rooflights may be considered to cause harm to the significance of the building. However, the SAC judges this to be less than substantial in NPPF terms, and considers that it would be outweighed by the benefit of bringing the asset back into a new use consistent with its conservation.

Internally, the retention of some full height space is very welcome, as is the retention of the sanctuary and chancel as an undivided volume. The arcade would be visible from the main living spaces and smaller rooms situated in the aisles rather than greater subdivision of the nave. All of these design decisions contribute to maintaining the significance of the interior. The curved walls of the stair encasements are likely to read clearly as new additions: materials and detailing should be designed to support this.

It is very positive that the stained glass, pulpit, font, and clock would be retained within the scheme. In light of the sacramental significance of a font, there is a common practice of fitting the font cover or a lid securely over the font bowl to prevent its reuse: this may be appropriate here.

Should the conversion come to fruition, it will be a major change to the building, particularly its interior. The church should be recorded to Level 2 under the Historic England guidance. While the written and analytical element of this is adequately covered by the CBC and SAC reports, it is important that the building is professionally photographed prior to conversion.

Overall, the SAC welcomes the proposed conversion and its sensitive approach, highlighting only a caution around the extent of the repair work needed.

Yours sincerely

C L Smith

Dr Claire Smith

Cc Jeremy Tipping, Closed Churches Team Manager

HANSON
CHARTERED SURVEYORS

Our ref: PJD/MSH/2122
Your ref:

Emma Cosgrif
Church Commissioners for England
Church House
31 Great Smith Street
Westminster
London
SW1P 3AZ

24 October 2023

Dear Emma

Holy Innocents Church, Vicarage Road, Thornhill Lees, Dewsbury, West Yorkshire, WF12 9PD

We – Hanson Chartered Surveyors – have acted on behalf of the Church Commissioners, the Diocese of Leeds and its predecessors (Diocese of West Yorkshire and the Dales and Diocese of Wakefield) for over 10 years, in the disposal of closed churches and other property assets.

We began marketing Holy Innocents Church, Thornhill Lees, in April 2020, seeking expressions of interest, on an 'offers invited' basis. The primary objective being to establish whether any interest in a continuation of community use existed.

We advertised the church's availability extensively, in order to fully expose the opportunity to the market. During the marketing period – which ran from April 2020 and, to some degree, is still live – more than 50 enquiries have been received, which, in our experience, is a high number, for a property of this type, and supports our belief that the church has been fully exposed to the market.

I enclose an anonymised list of the enquiries received. A significant proportion of these parties either viewed in person, whether that be externally or internally, or viewed virtually, courtesy of a virtual tour we offered on-line. Many of these parties were private individuals, seeking to convert the property to some form of residential dwelling.

In terms of feedback from interested parties considering the property, the sheer scale of the building has deterred many. In addition, the lack of available car parking, both within the site and in the immediate vicinity, has proved to be a significant drawback.

Hanson Chartered Surveyors
Oak House, New North Road, Huddersfield, West Yorkshire, HD1 5LG
Telephone: 01484 432043 DX: 712972 HUDDERSFIELD
Email: enquiries@hanson-cs.co.uk Web: www.hanson-cs.co.uk

Hanson Chartered Surveyors is a trading name of **Walker Singleton (Commercial) Ltd.**
A Walker Singleton Group Company
Registered in England No. 3351035 VAT Reg. No. 686 6644 77
Regulated by RICS

RICS

WalkerSingleton
Chartered Surveyors

Our use-finding exercise has resulted in less than a handful of enquiries for uses other than residential conversion proposals and none that were economically viable or had the necessary funds or wherewithal to take on the huge challenges posed by this large, resource-hungry, Grade II Listed building, with the proposal that has been provisionally accepted being the only fully evidenced proposal received.

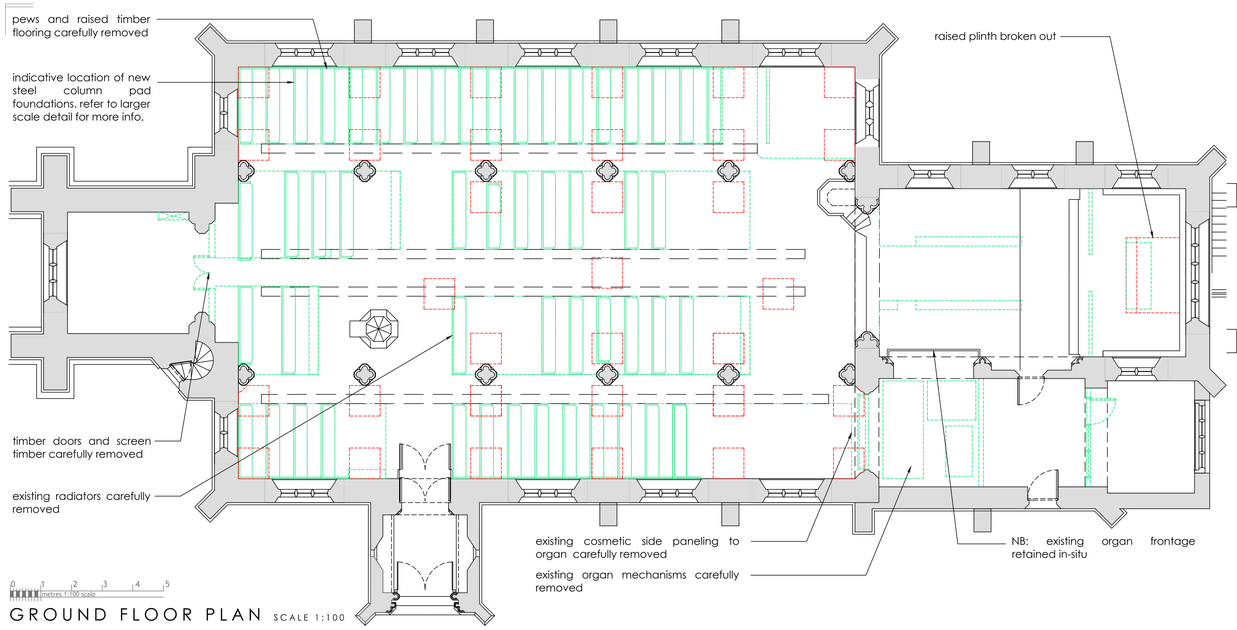
We consider that the property has been fully exposed to the market, for a significant period of time, and that the current proposal represents the best opportunity for securing the necessary investment into the building and securing its long-term conservation.

Kind regards.

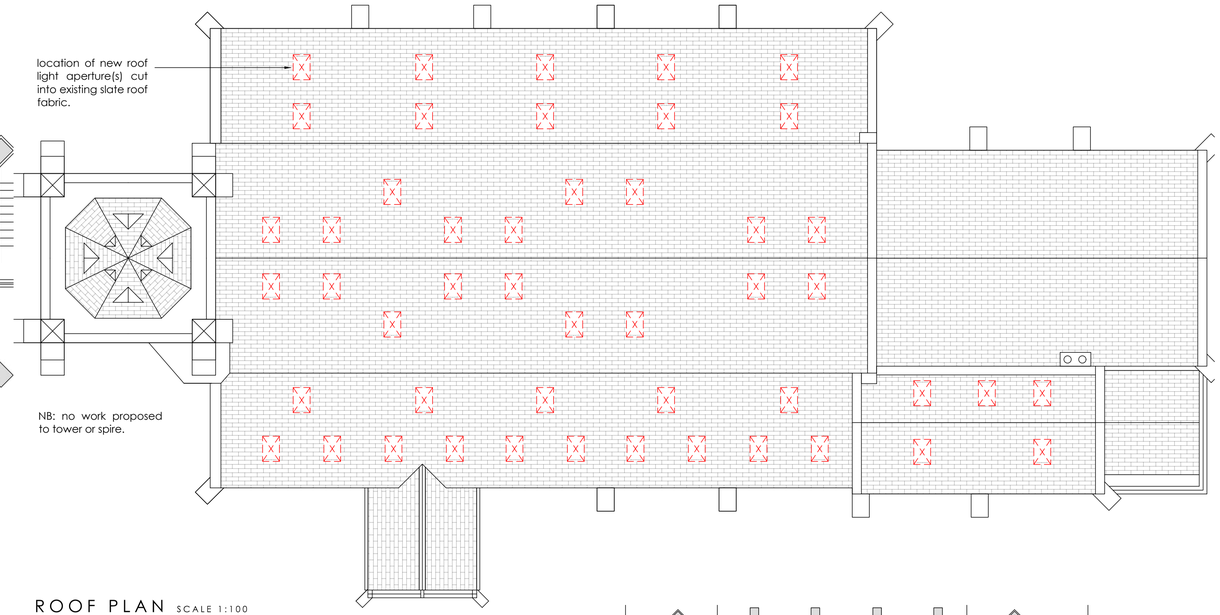
Yours sincerely

Philip J Deakin BSc (Hons) MRICS

Date Registered	Enquiry Summary
27-May-20	Enquiry re Thornhill Lees church.
07-Jul-20	Seeking churches and similar, to convert to residential.
08-Jul-20	Enquiry through Boxpod re Holy Innocents Church, Dewsbury.
26-Jul-20	Enquiry through Righmove re Holy Innocents Church, Vicarage Road, Thornhill Lees, Dewsbury.
27-Jul-20	Enquiry through Rightmove re Holy Innocents Church, Vicarage Road, Thornhill Lees, Dewsbury. Interested in it for a bridal shop. Has existing bridal shop business, based in Conisbrough, Doncaster.
28-Jul-20	Enquiry and viewing request through Rightmove re Holy Innocents Church, Vicarage Road, Thornhill Lees, Dewsbury, and later re Claremount Church.
06-Aug-20	Enquiry through Zoopla re Dewsbury Church.
11-Aug-20	Enquiry through Rightmove re Dewsbury church.
02-Sep-20	Enquiry through Rightmove re Thornhill Lees Church.
06-Sep-20	Enquiry and viewing request through Zoopla re Thornhill Lees Church.
05-Oct-20	Enquiry re Holy Innocents Church, Dewsbury, for residential conversion.
12-Oct-20	Enquiry through Rightmove re Thornhill Lees Church.
03-Nov-20	Enquiry through Rightmove re Thornhill Church.
03-Nov-20	Enquiry through Rightmove re Thornhill Church.
25-Nov-20	Enquiry re churches for sale, generally.
09-Dec-20	Enquiry re Thornhill Lees church.
18-Jan-21	Enquiry through Rightmove re Thornhill Lees church.
20-Jan-21	Enquiry re Thornhill Lees church.
08-Feb-21	Enquiry through Rightmove re Thornhill Lees church.
24-Feb-21	Enquiry re Thornhill Lees church.
25-Feb-21	Enquiry re Thornhill Lees church.
12-Mar-21	Potentially interested in Thornhill Lees church.
12-Mar-21	Enquiry through Zoopla re Thornhill Lees church.
16-Mar-21	For residential conversion.
18-Mar-21	Enquiry re Thornhill Lees church.
19-Mar-21	Enquiry and viewing re Thornhill Lees church. Exploring a community use.
20-Mar-21	Enquiry through Rightmove re Thornhill Lees church.
20-Mar-21	Enquiry through Rightmove re Thornhill Lees church.
31-Mar-21	Enquiry re Thornhill Lees church.
20-Apr-21	Enquiry through WS website re Thornhill Lees church.
05-May-21	Enquiry re Thornhill church.
21-May-21	Enquiry through Rightmove re Thornhill Lees church.
24-May-21	Enquiry through Rightmove re Thornhill Lees church.
30-May-21	Enquiry through Rightmove re Thornhill Lees church.
30-May-21	Enquiry through Rightmove re Thornhill Lees Church.
14-Dec-21	Enquiry through Rightmove re Thornhill Lees church.
07-Jan-22	Enquiry and viewing re Thornhill Lees church.
11-Jan-22	Enquiry re Cornholme church and Thornhill Lees church.
17-Jan-22	Enquiry through Realla re Thornhill Lees church.
20-Jan-22	Enquiry re Thornhill Lees church.
23-Feb-22	Enquiry through Rightmove re Thornhill Lees church.
07-Mar-22	Enquiry through Rightmove re Thornhill Lees church.
07-Mar-22	Enquiry re Cornholme church and Thornhill Lees church.
07-Mar-22	Enquiry re Thornhill Lees church.
14-Mar-22	Enquiry through Rightmove re Thornhill Lees church, for residential conversion.
14-Mar-22	Enquiry, offer and viewing re Thornhill Lees church.
01-Apr-22	Enquiry re Thornhill Lees church.
01-Apr-22	Enquiry re Thornhill church.
06-Apr-22	Enquiry through Zoopla re Thornhill Lees church.
21-Apr-22	Enquiry through Realla re Thornhill Lees church.
27-Apr-22	Seeking property for residential conversion.
27-Apr-22	Seeking property for residential conversion.
09-May-22	Seeking property for commercial use.



GROUND FLOOR PLAN SCALE 1:100



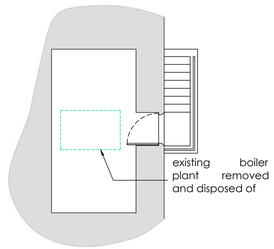
ROOF PLAN SCALE 1:100

PROPOSED DEMOLITION KEY & NOTES

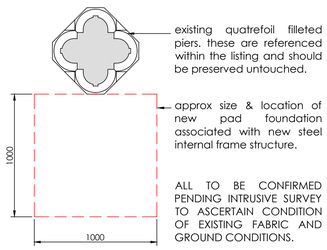
1. *red line denotes extent of existing building fabric to be demolished or adapted to facilitate the proposed new layout.
2. green line denotes extent of existing 'soft' fabric to be removed.

NB: *LAYOUT & DESIGN OF NEW STRUCTURE - AND CORRESPONDING INTERFACE WITH EXISTING FABRIC - IS SHOWN INDICATIVE ONLY PENDING INTRUSIVE SURVEY AND ASCERTAINING CONDITION OF EXISTING BUILDING FABRIC AND GROUND CONDITIONS.

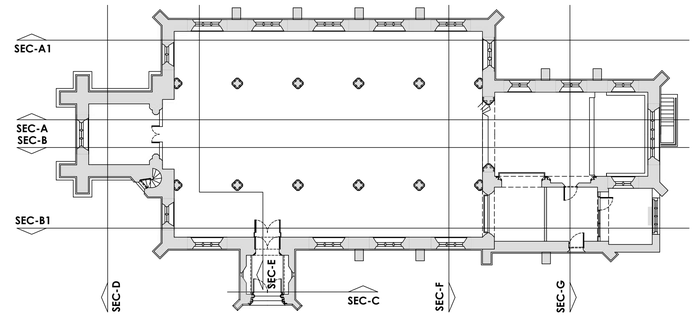
BUILDING & DEMOLITION VOLUMES			
EXISTING BUILDING VOLUME (m3)		4687.65	m3
PROPOSED DEMOLITION OF EXISTING FABRIC (m3)			
TYPE	LOCATION	TOTAL	
Column Foundations	Extg Floor	33.00	
Steel Beam Connectio	Extg walls	2.75	
Rooflights	Extg Roof	24.00	
Ventilation	Extg Roof	1.20	
TOTAL DEMOLITION		60.95	m3
% OF EXTG FABRIC		1.30%	



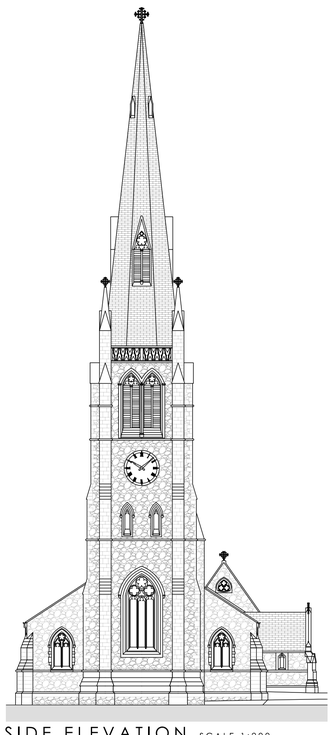
BASEMENT PLAN SCALE 1:100



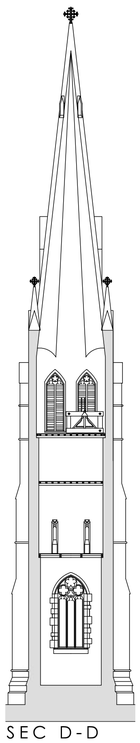
TYPICAL NEW PAD SCALE 1:25



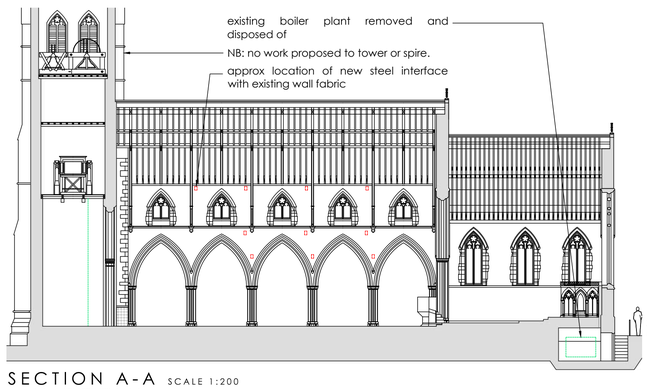
SECTION REFERENCE PLAN SCALE 1:100



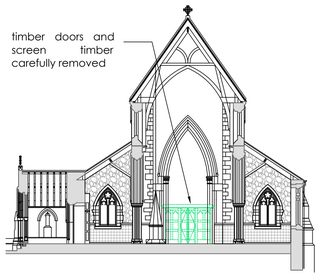
SIDE ELEVATION SCALE 1:200



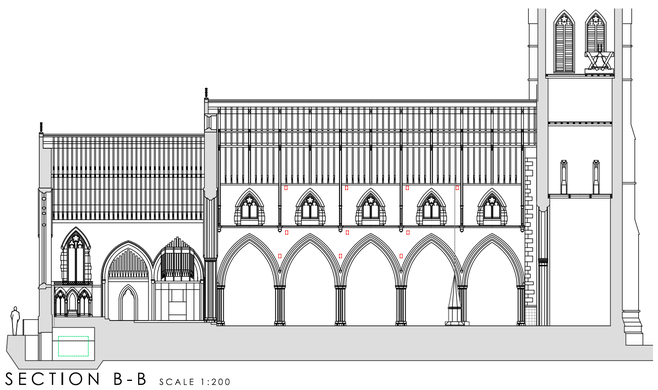
SEC D-D
SCALE 1:200



SECTION A-A SCALE 1:200

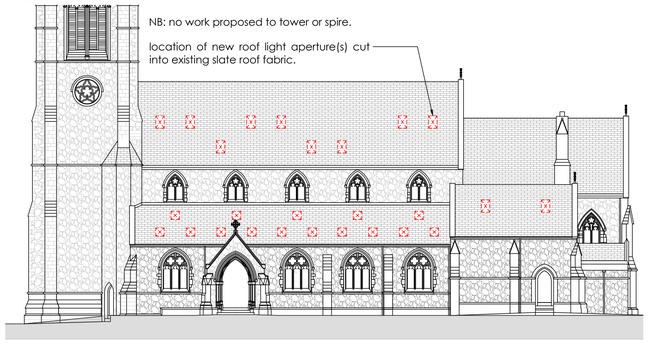


SECTION E-E SCALE 1:200

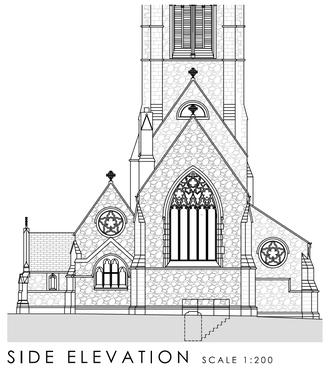


SECTION B-B SCALE 1:200

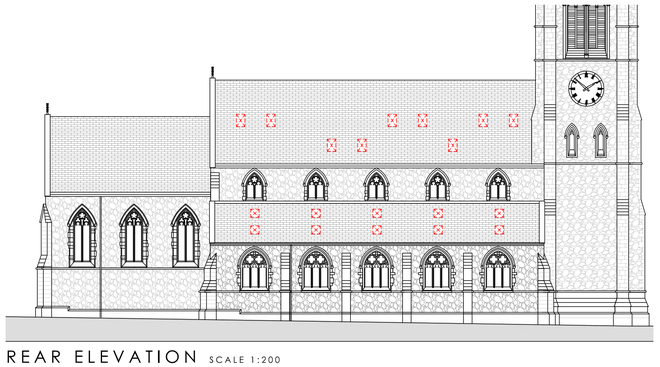
SECTION F-F SCALE 1:200



FRONT ELEVATION SCALE 1:200



SIDE ELEVATION SCALE 1:200



REAR ELEVATION SCALE 1:200

Rev	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client:
Church of Holy Innocents
Vicarage Road
Dewsbury, WF12 9PD

Project No: 22-111
Dwg No: A11
Rev:

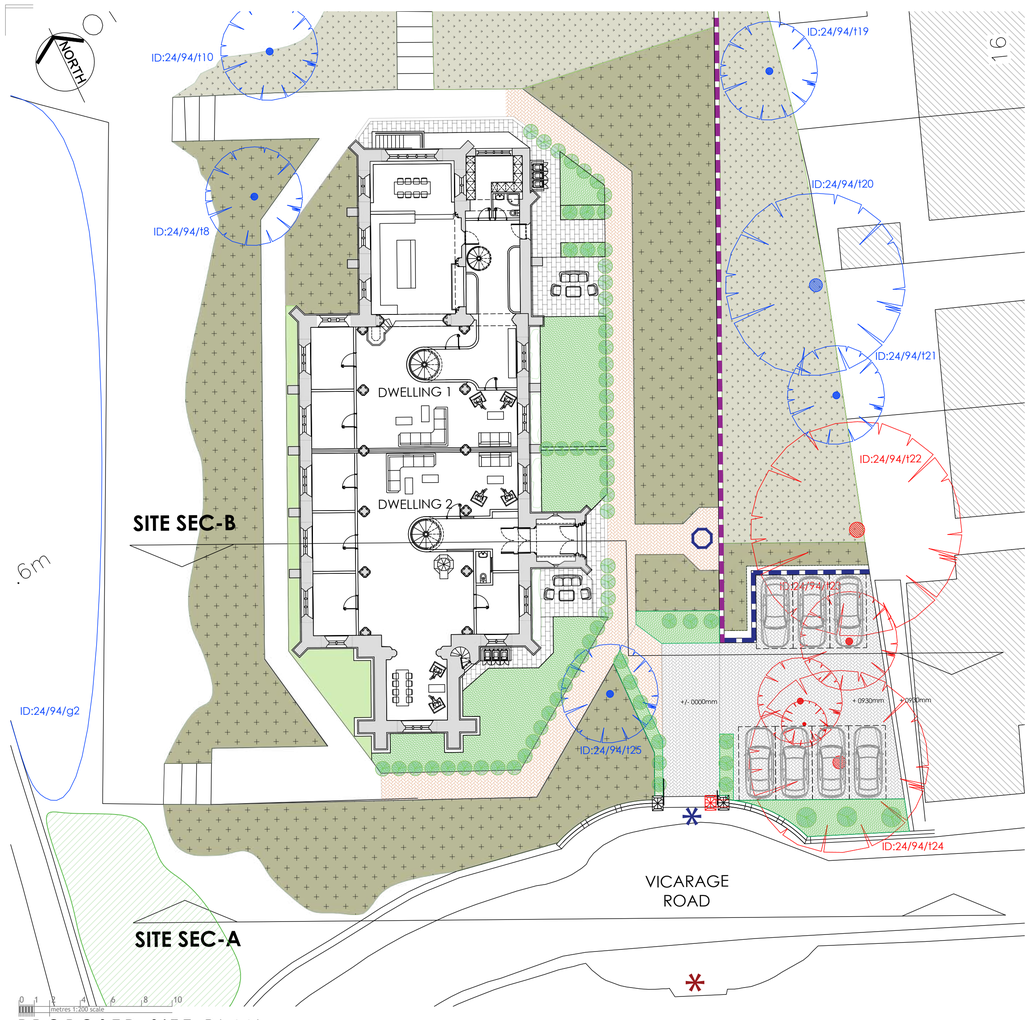
Drawing:
G.A. Information
Proposed Demolition

Scale: 1:100 @A1
Drawn By: s.c.
Date: Aug 22
Checked By:
Date:

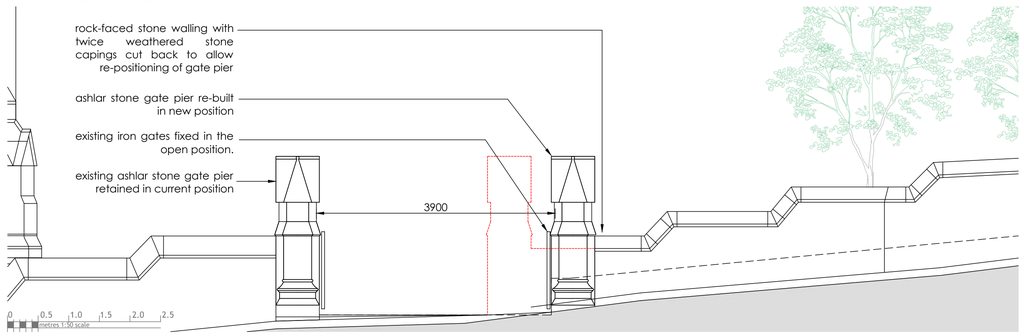
SC1PROPERTY
SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12555037

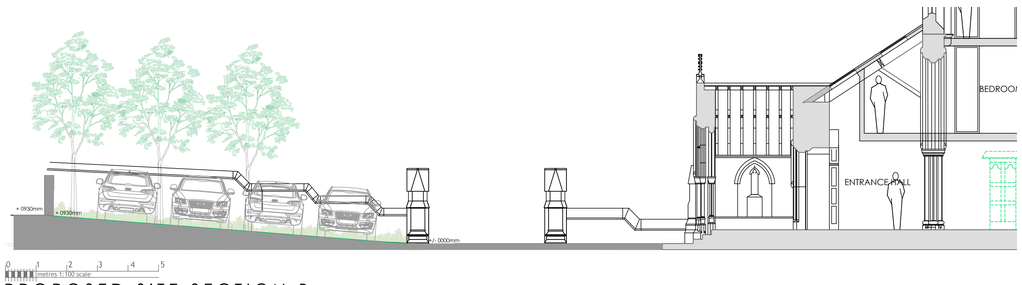
STANDARD NOTES
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quantities taken in any way, the building designers are to be informed before works proceed.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.



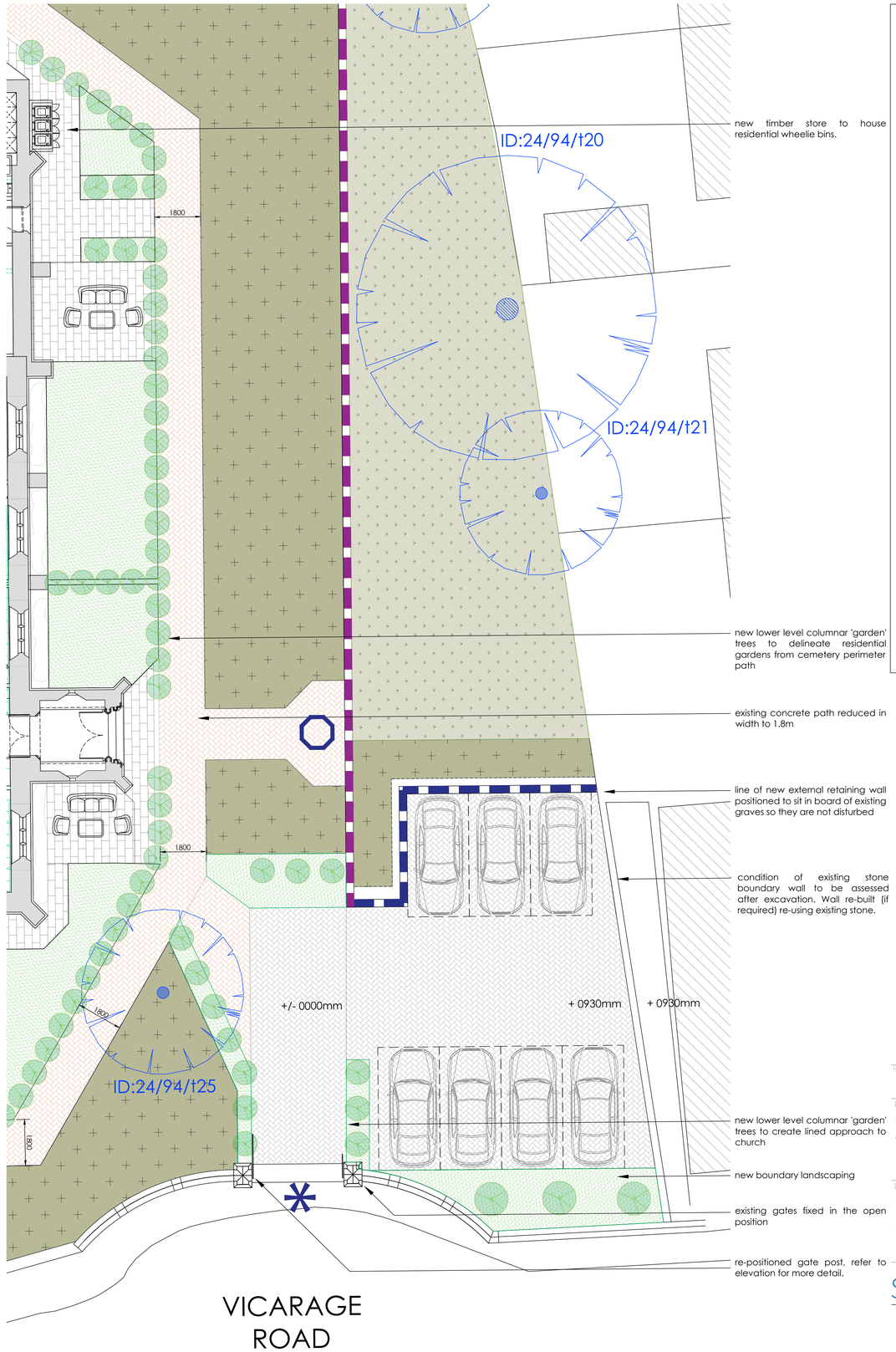
PROPOSED SITE PLAN SCALE 1:200



PROPOSED SIT SECTION A - PROPOSED GATE SCALE 1:50



PROPOSED SITE SECTION B SCALE 1:100



PROPOSED SITE PLAN SCALE 1:100

EXISTING EXTERNAL LANDSCAPING

- A) existing hard surfaced path, generally concrete
- B) existing soft landscaping - grass
- C) existing soft landscaping - overgrown scrub
- D) existing graves set within soft landscaping
- E) existing listed sundial
- F) existing listed gates (Holy Innocents)
- G) existing listed gates (Vicarage)
- H) existing 600mm high dwarf rock-faced stone wall
- J) existing tree with TPO

PROPOSED EXTERNAL LANDSCAPING

1. proposed new vehicular hard surfacing to match new footpath ie: 'tegular' type sets
2. proposed new pedestrian footpath ie: 'tegular' type sets
3. proposed new paving flags to residential patio areas
4. proposed new soft landscaping - grass
5. re-use demolished rock-faced stonework to create new low level retaining wall
6. existing trees to be removed
7. proposed new tree planting
8. area designated for landscaping enhancement as part of ecology assessment

Rev	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client:
Church of Holy Innocents
Vicarage Road
Dewsbury, WF12 9PD

Project No: 22-111
Dwg No: A12
Rev:

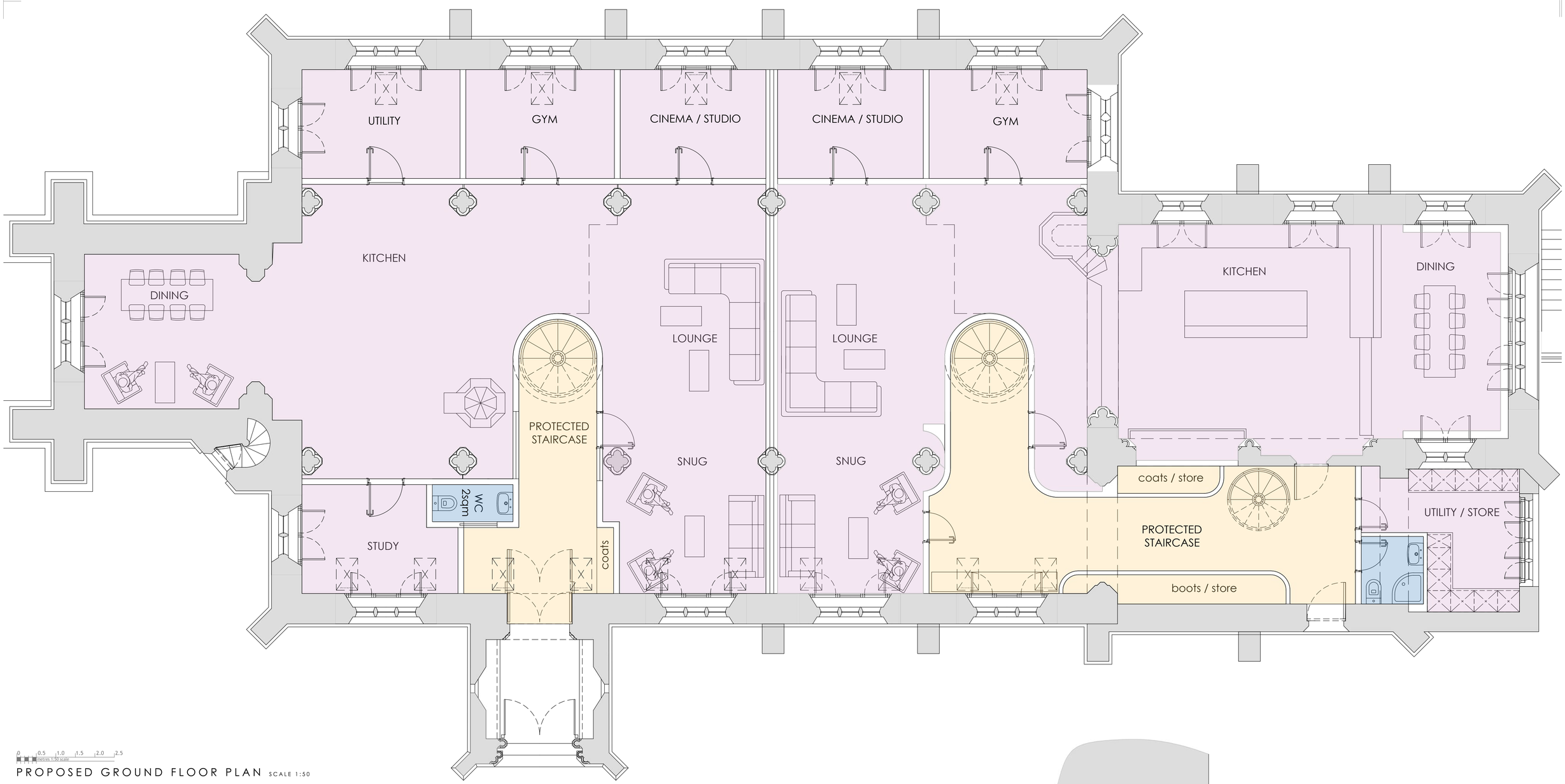
Drawing:
G.A. Information
Site Plans As Proposed

Scale: A/S @A1
Drawn By: RJ
Date: Jun 23
Checked By:
Date:

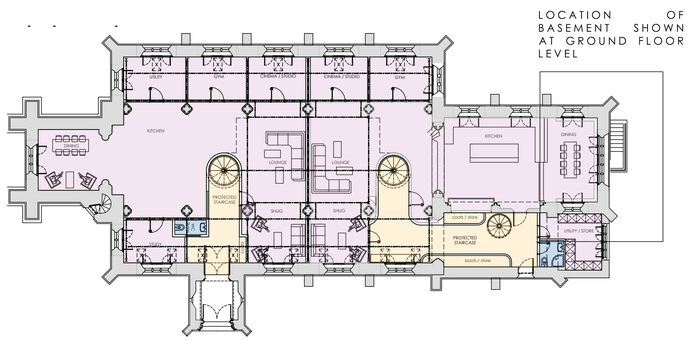
SC1PROPERTY
SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered number - 12553037

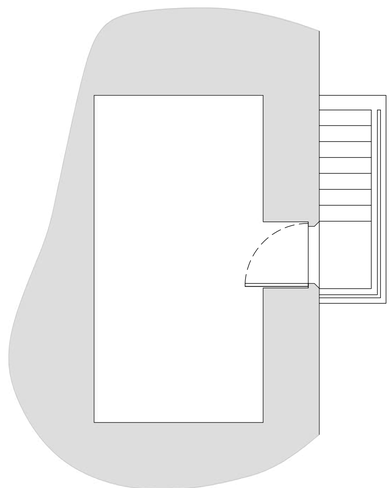
STANDARD NOTES
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quant's taken in any way, the building designers are to be informed before works initiated.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.



PROPOSED GROUND FLOOR PLAN SCALE 1:50



BASEMENT REFERENCE PLAN
PROPOSED GROUND FLOOR PLAN SCALE 1:200



PROPOSED BASEMENT PLAN SCALE 1:50

Rev	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client: Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD	Project No: 22-111
	Dwg No: A13
	Rev:
Drawing: G.A. Information, Plans As Proposed, Basement & Ground Floors	Scale: 1:50 @A1
	Drawn By: s.c. / Date: Aug 22
	Checked By: / Date:

SC1PROPERTY

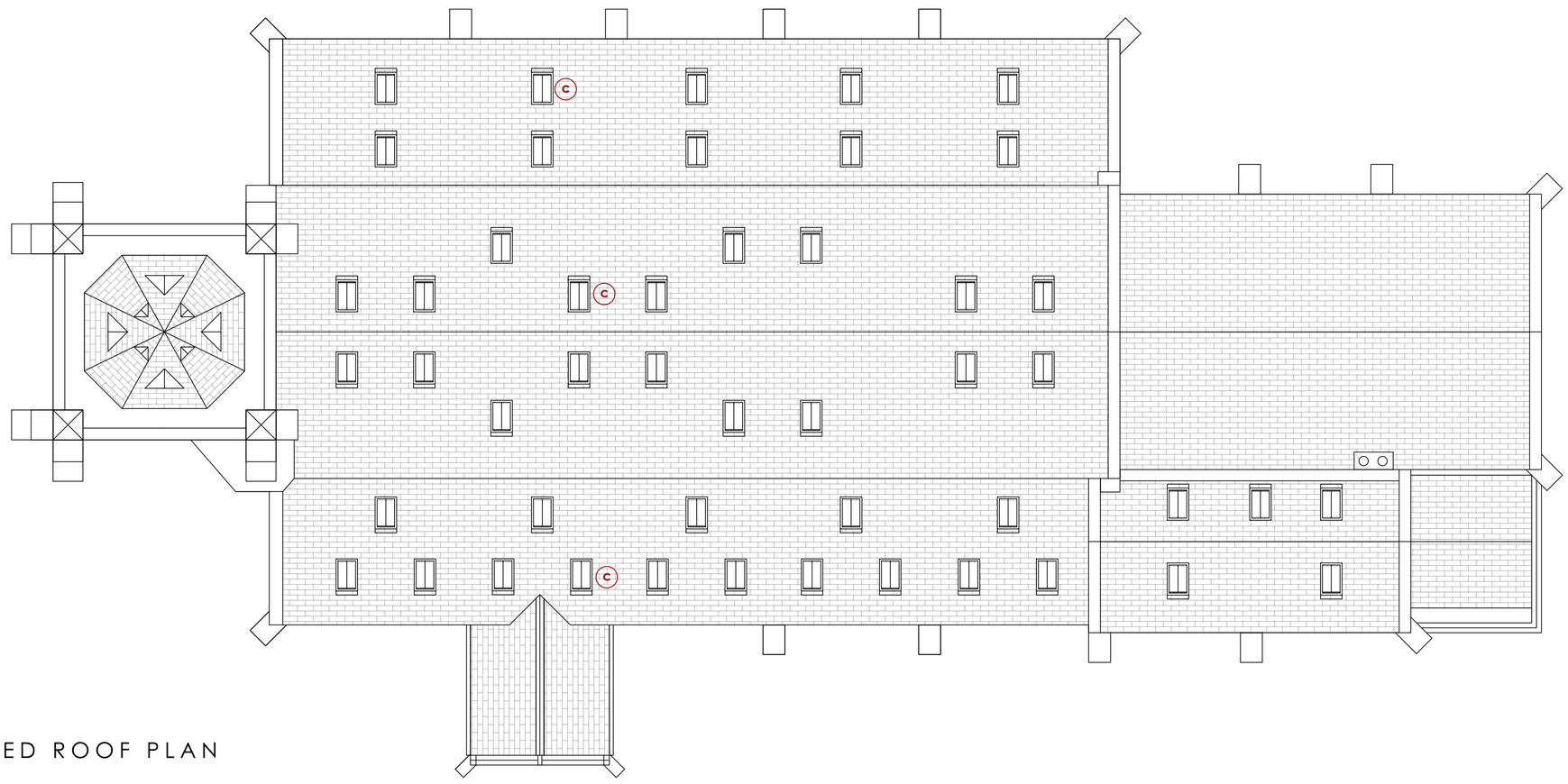
SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12653037

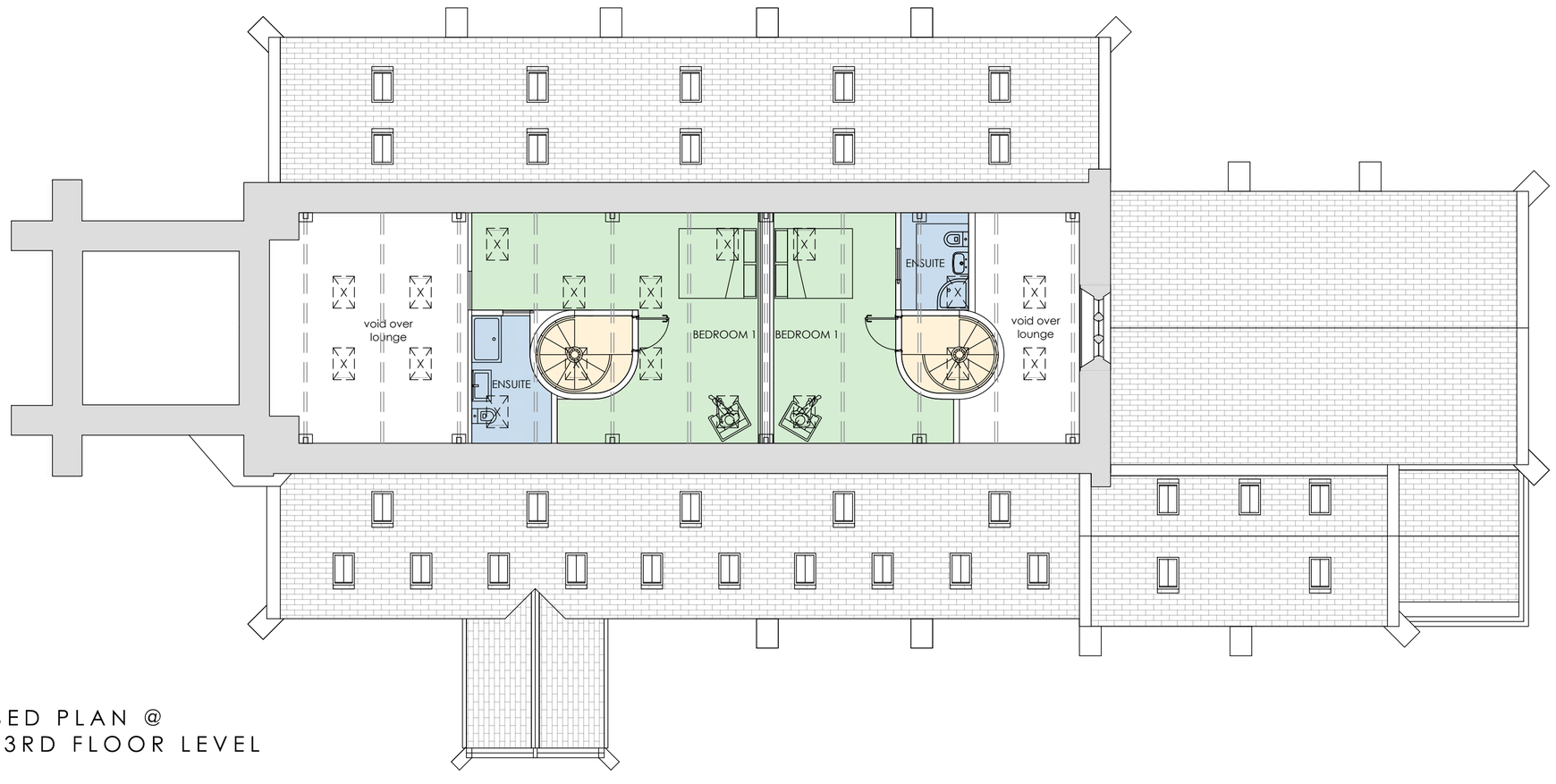
STANDARD NOTES:
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quantities taken in any way, the building designers are to be informed before works are carried out.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.

PROPOSED NEW BUILDING FABRIC

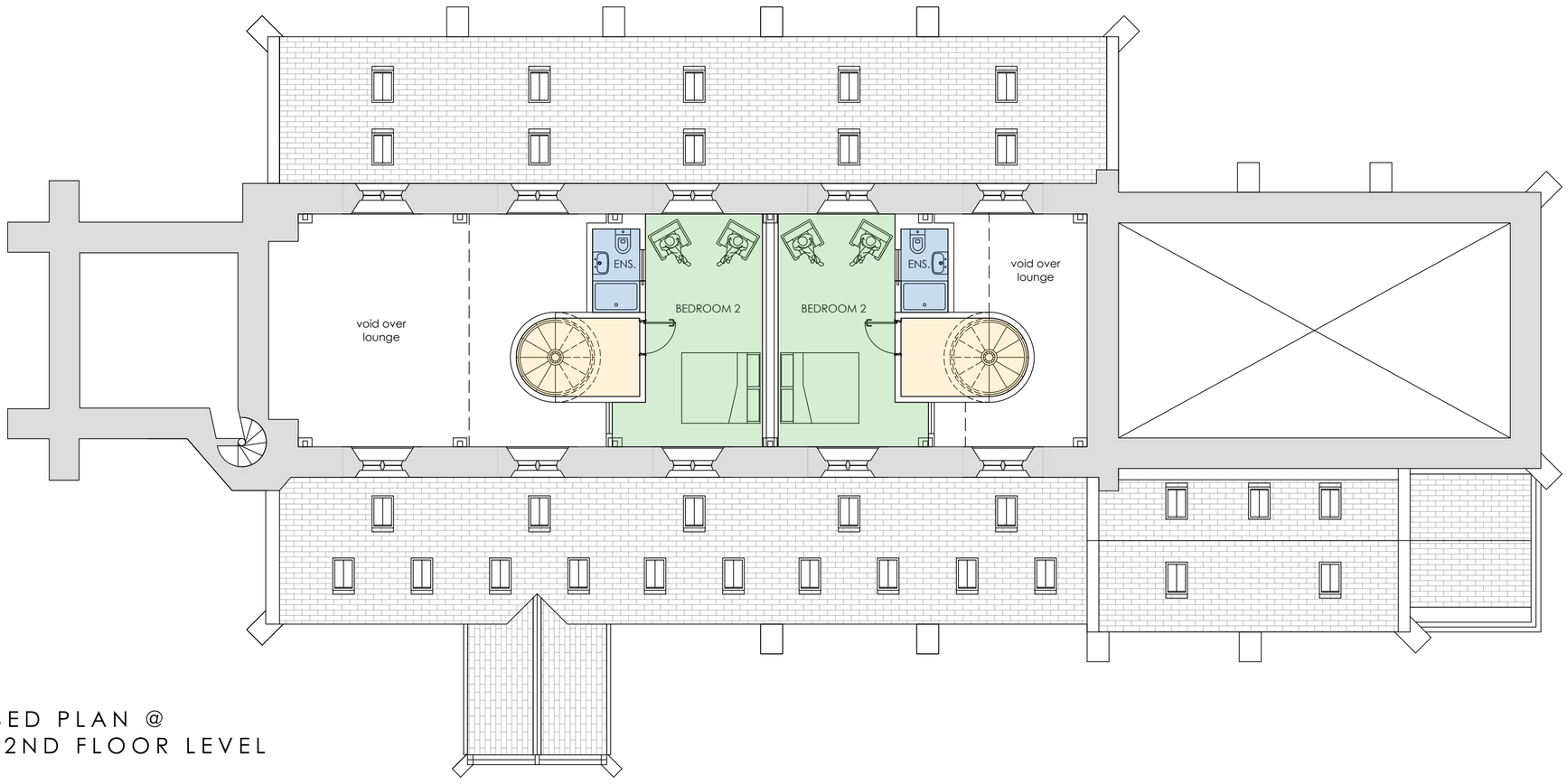
a. new lower level columnar 'garden' trees to delineate residential gardens from cemetery perimeter path
b. external protective sheeting covering the existing stained glass windows.
c. new rooflight within existing roofing



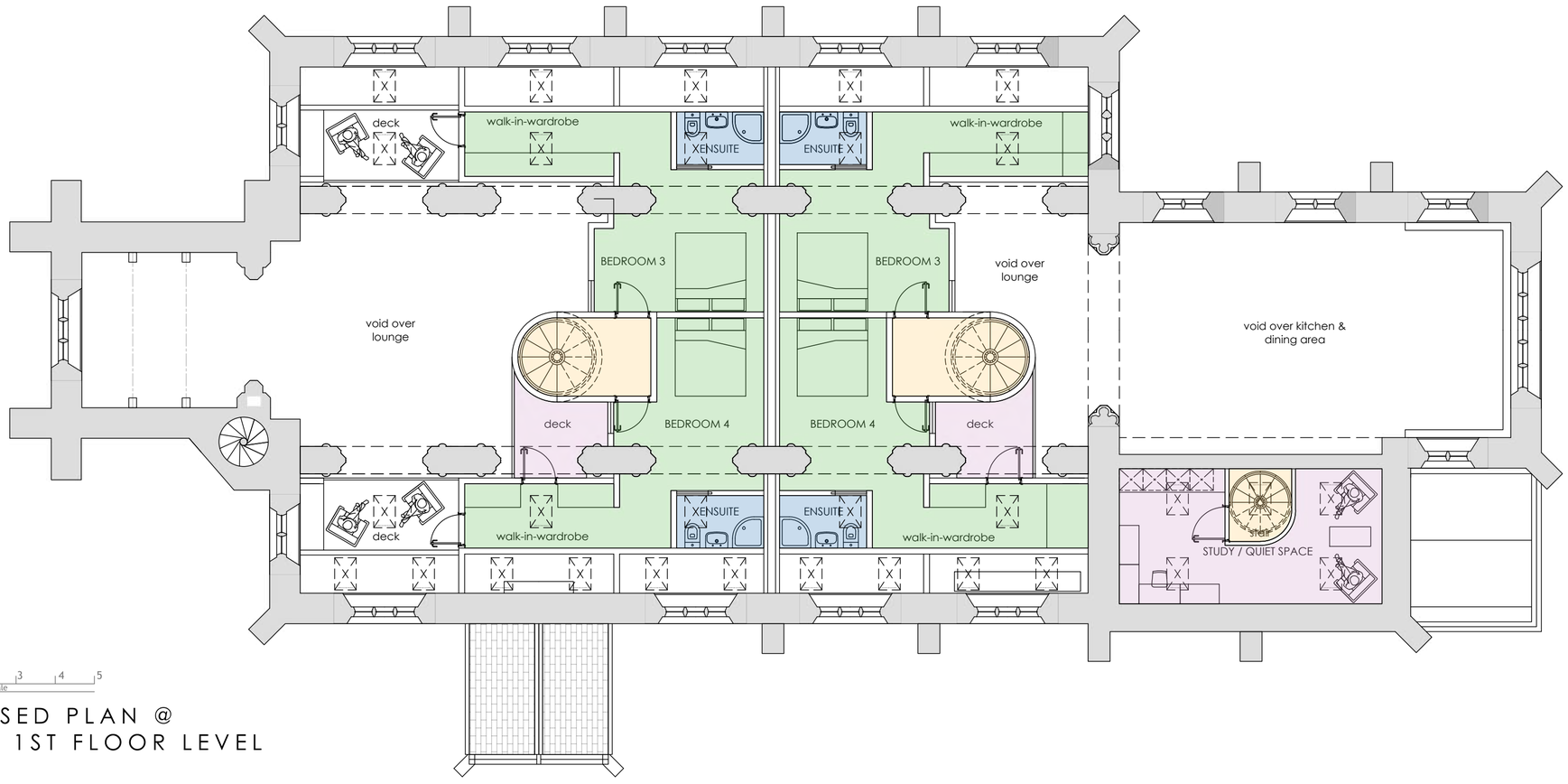
PROPOSED ROOF PLAN
SCALE 1:100



PROPOSED PLAN @
FUTURE 3RD FLOOR LEVEL
SCALE 1:100



PROPOSED PLAN @
FUTURE 2ND FLOOR LEVEL
SCALE 1:100



0 1 2 3 4 5
metres 1:100 scale

PROPOSED PLAN @
FUTURE 1ST FLOOR LEVEL
SCALE 1:100

Rev.	Date	Details	Drawn	Checked

Issued for:
PLANNING

Project/Client:
Church of the Holy Innocents
Vicarage Road
Dewsbury, WF12 9PD

Project No: 22-111
Dwg No: A14
Rev:

Drawing:
G.A Information
Plans As PROPOSED
First to Roof

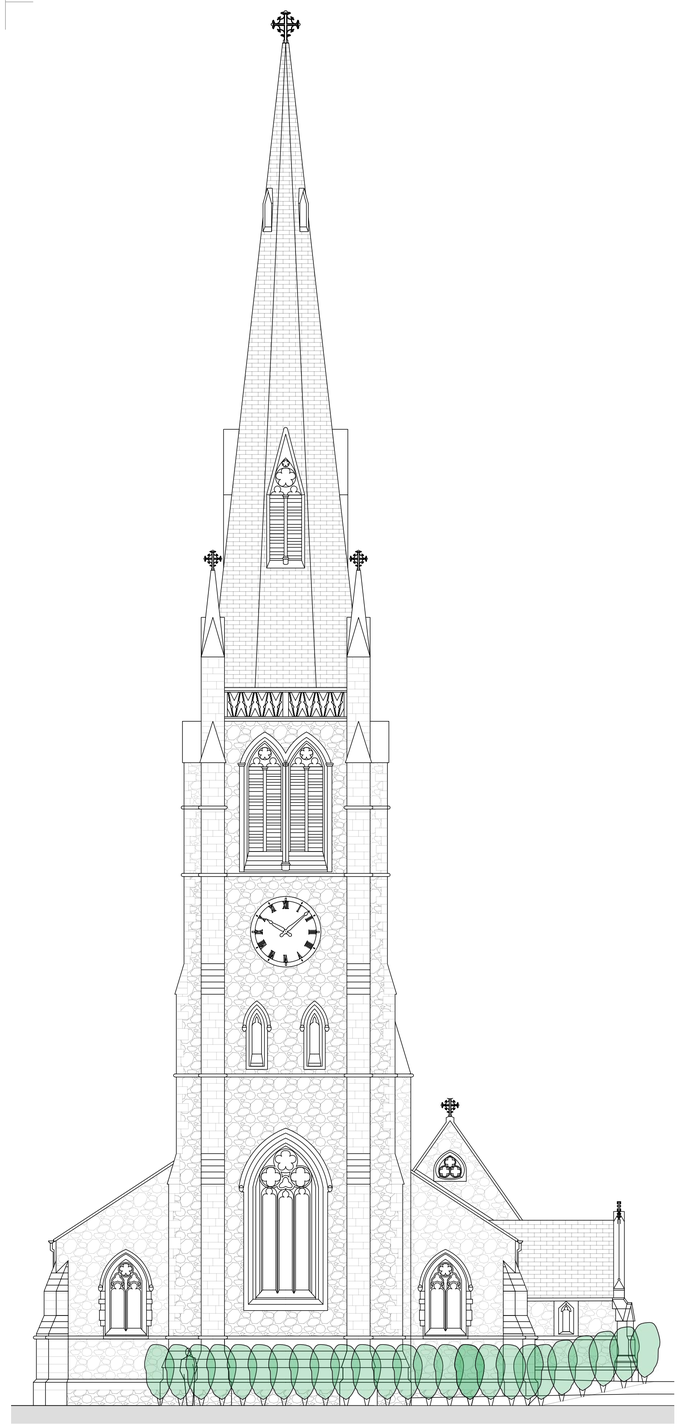
Scale: 1:100 @A1
Drawn By: RJ
Date: June 23
Checked By: SC
Date:

SC1PROPERTY

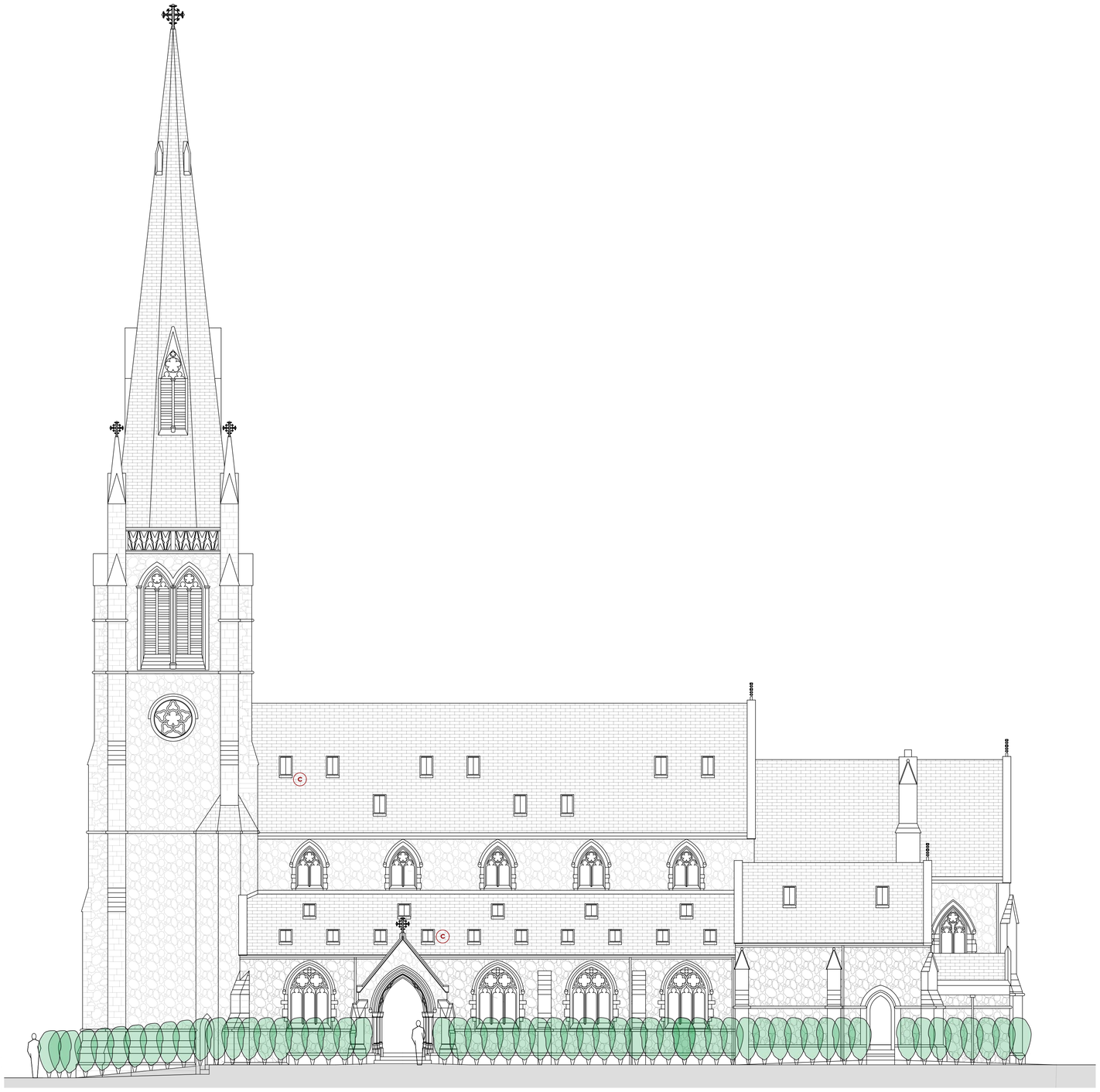
SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12353037

STANDARD NOTES:
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quant's taken in any way, the building designers are to be informed before works initiated.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.



PROPOSED SIDE ELEVATION SCALE 1:100



PROPOSED FRONT ELEVATION SCALE 1:100

0 1 2 3 4 5
metres 1:100 scale

PROPOSED NEW BUILDING FABRIC

a. new lower level columnar 'garden' trees to delineate residential gardens from cemetery perimeter path
b. external protective sheeting covering the existing stained glass windows.
c. new rooflight within existing roofing

Rev	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client: Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD	Project No: 22-111
	Dwg No: A15
	Rev:
Drawing: G.A. Information, Elevations As PROPOSED (sht 1), Front & Side Elevations	Scale: 1:100 @A1
	Drawn By: JJ Date: Jun 23
	Checked By: Date:

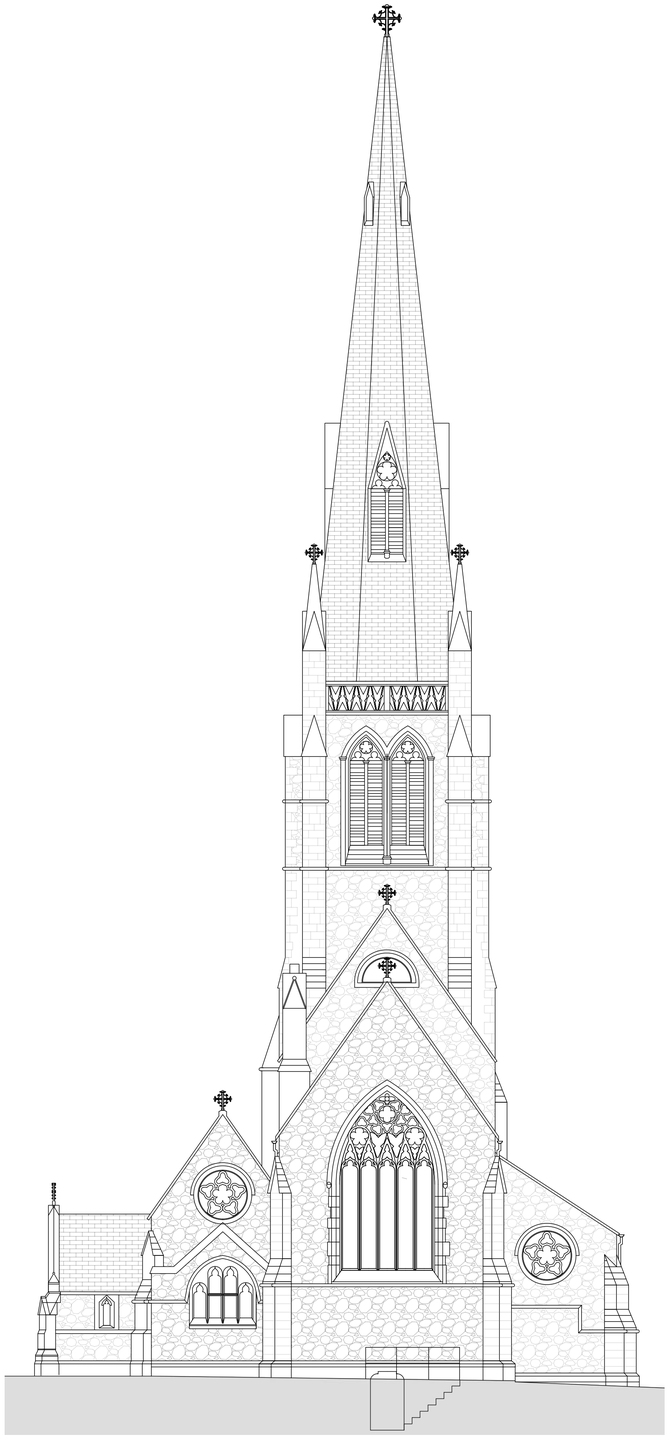
SC1PROPERTY

SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.

Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12355037

STANDARD NOTES
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quant's taken in any way, the building designers are to be informed before works initiated.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings. - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.



PROPOSED SIDE ELEVATION SCALE 1:100

0 1 2 3 4 5
metres 1:100 scale

PROPOSED REAR ELEVATION SCALE 1:100

PROPOSED NEW BUILDING FABRIC

a. new lower level columnar 'garden' trees to delineate residential gardens from cemetery perimeter path
b. external protective sheeting covering the existing stained glass windows.
c. new rooflight within existing roofing

Rev	Date	Details	Drawn	Checked

Issued for:

PLANNING

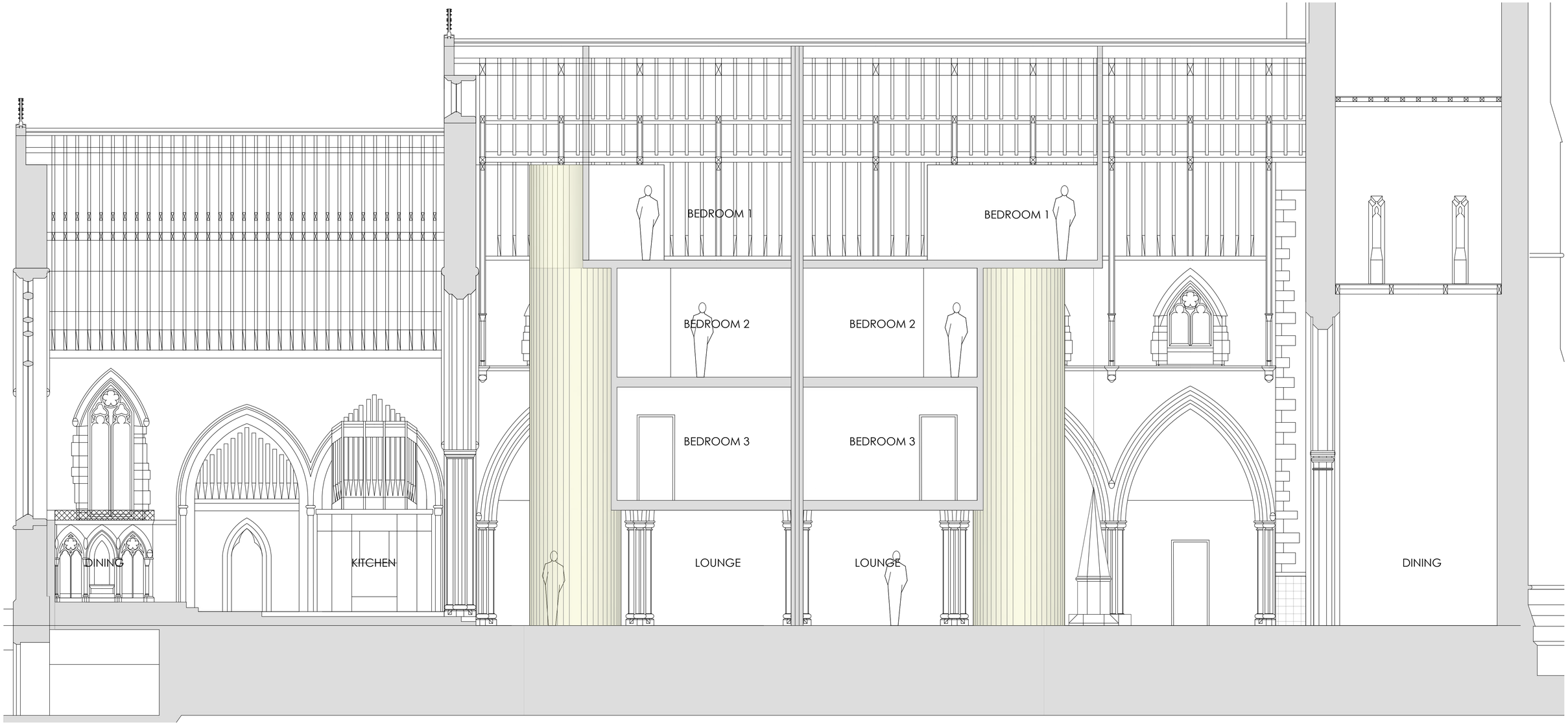
Project/Client: Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD	Project No: 22-111
	Dwg No: A16
	Rev:
Drawing: G.A. Information, Elevations As PROPOSED (sht 2), Rear & Side Elevations	Scale: 1:100 @A1
	Drawn By: JJ / Date: Jun 23
	Checked By: / Date:

SC1PROPERTY

SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

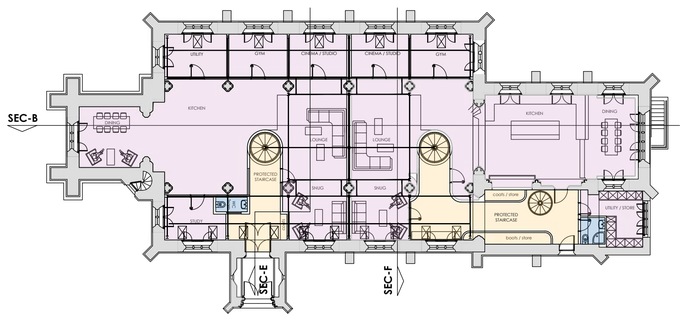
© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12559257

STANDARD NOTES:
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quantity taken in any way, the building designers are to be informed before works initiated.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordinance Survey and/or existing record drawings. - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.



PROPOSED SECTION B-B - MAIN HALL SCALE 1:50

0 0.5 1.0 1.5 2.0 2.5
metres 1:50 scale



SECTION REFERENCE PLAN SCALE 1:100

Rev.	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client:
Church of Holy Innocents
Vicarage Road
Dewsbury, WF12 9PD

Project No: 22-111
Dwg No: A17
Rev:

Drawing:
G.A. Information
Sections As Proposed (sht 1)
Section B-B

Scale: A/S @A1
Drawn By: s.c. Date: Jun 23
Checked By: Date:

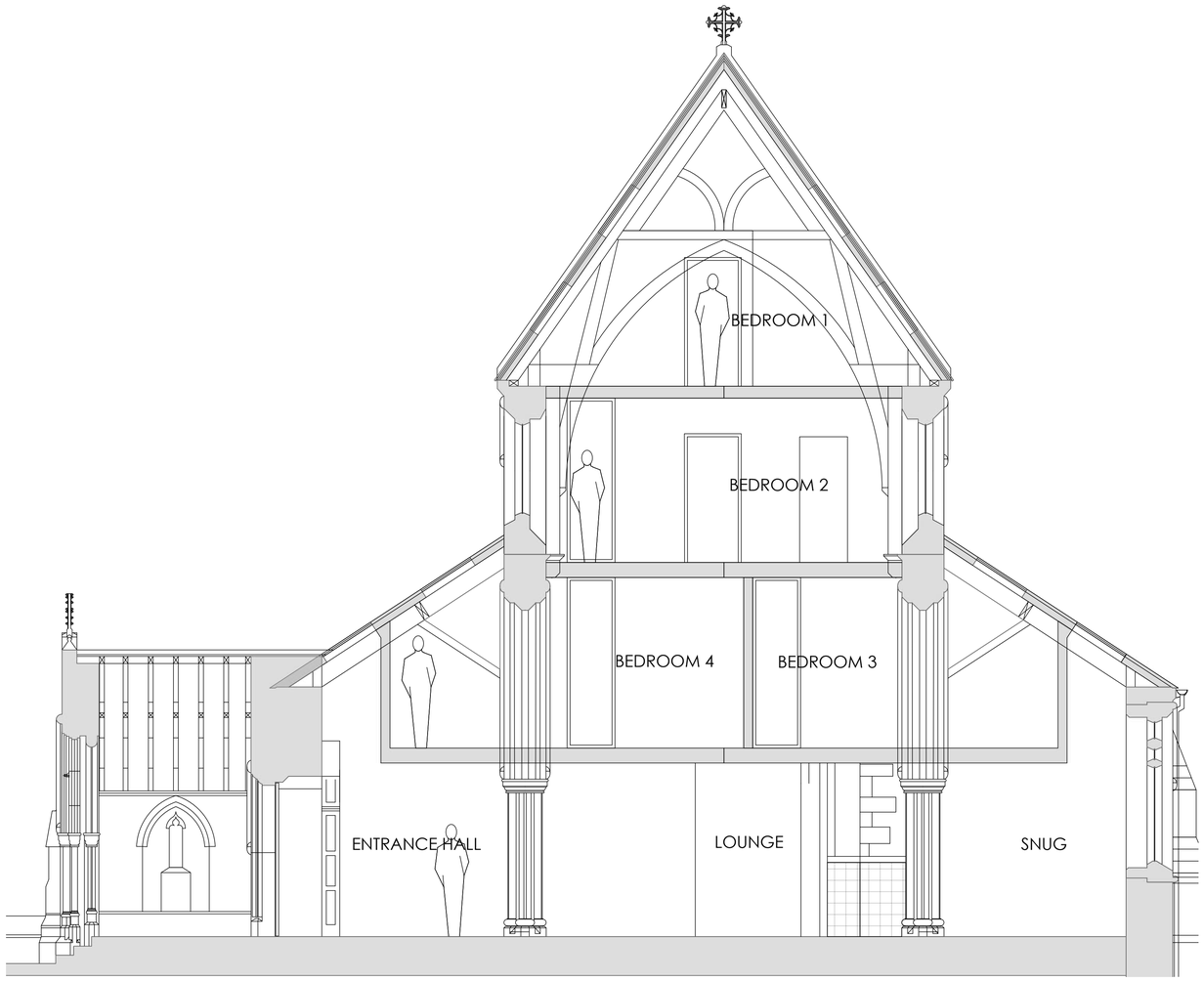
SC1PROPERTY

SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.

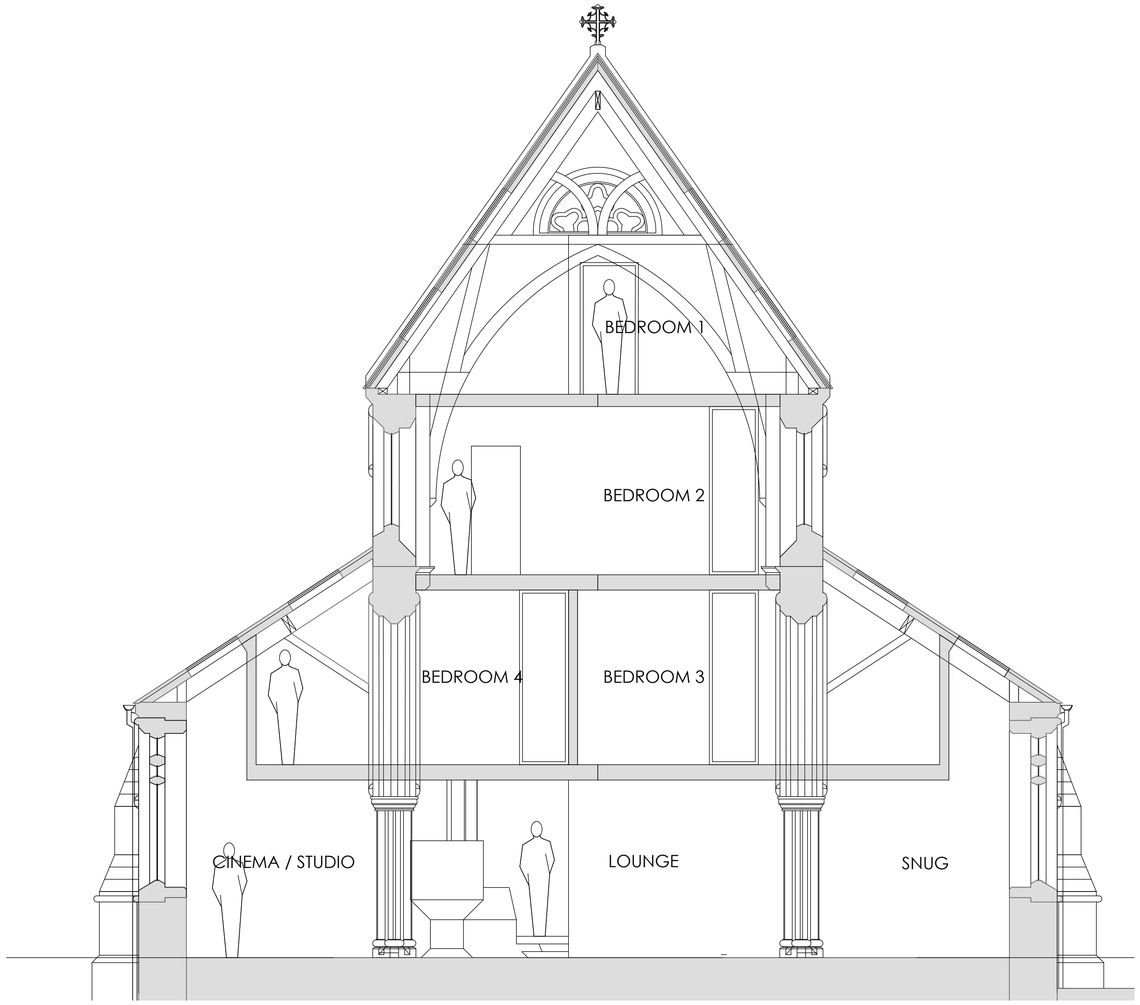
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12553057

STANDARD NOTES
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quarter scale when in any way, the building designers are to be informed before works initiated.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings. - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.

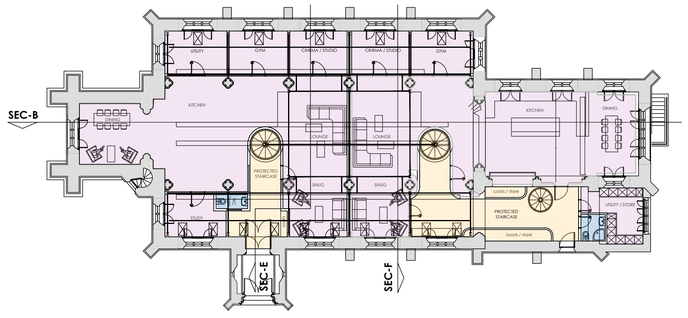


PROPOSED SECTION E-E SCALE 1:50

0 0.5 1.0 1.5 2.0 2.5
metres 1:50 scale



PROPOSED SECTION F-F SCALE 1:50



SECTION REFERENCE PLAN SCALE 1:100

Rev	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client:
Church of Holy Innocents
Vicarage Road
Dewsbury, WF12 9PD

Project No: 22-111
Dwg No: A18
Rev:

Drawing:
G.A. Information
Sections As Proposed (sht 2)
Section E-E & F-F

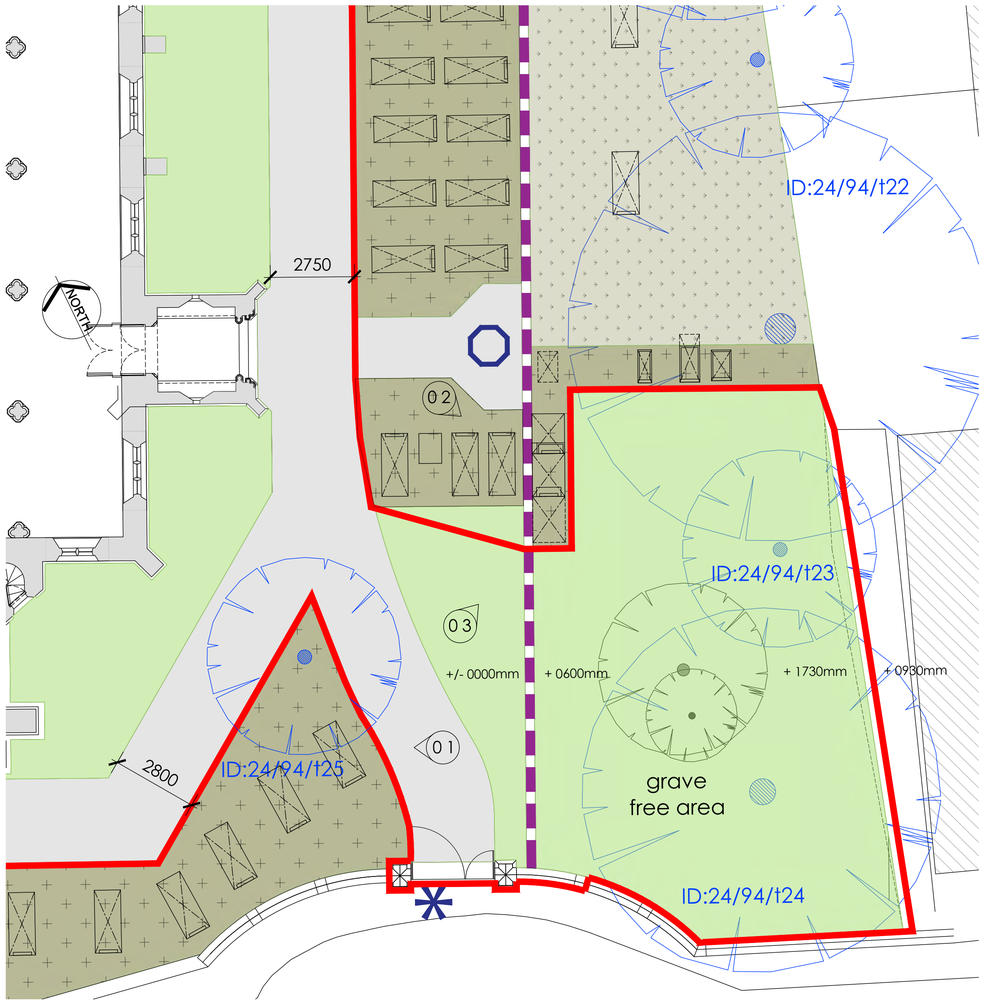
Scale: A/S @A1
Drawn By: s.c. Date: Jun 23
Checked By: Date:

SC1PROPERTY

SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

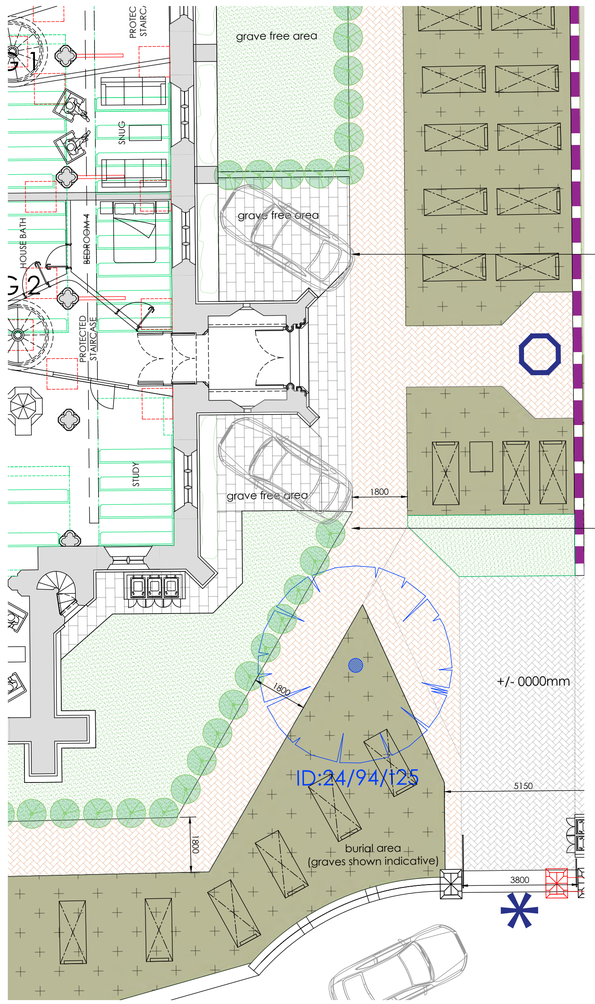
© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12555037

STANDARD NOTES:
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quantities taken in any way, the building designers are to be informed before works commence.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings - design and drawing content subject to Site Survey, Structural Survey, Site Investigations, Planning and Statutory Requirements and Approvals.



EXISTING SITE PLAN SCALE 1:100

0 1 2 3 4 5
metres 1:100 scale

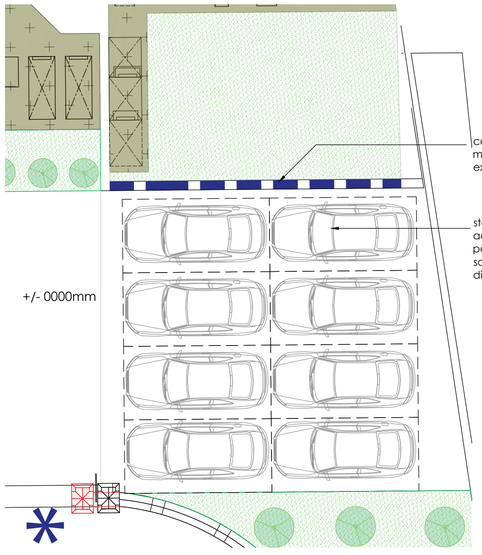


PARKING OPTION A SCALE 1:100
(WITHIN RESIDENTIAL CURTILAGE)

parking space could be possible but the close proximity to the existing graves and existing building - and the vehicular movements required for access/egress - would likely result in damage to both.

it is clear that parking in close proximity to the building is not a viable option and was not explored any further.

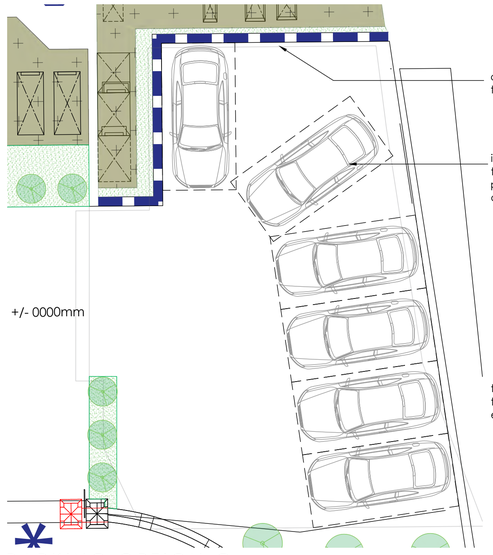
vehicular movements would have increased impact on pedestrian areas and would increase the likelihood of accidents.



car parking area kept to a minimum to lessen impact on existing soft landscaped area.

stacked car parking only option to achieve parking levels. stacked parking is not advisable or desired so this option has been discounted.

PARKING OPTION B SCALE 1:100
(WITHIN DEDICATED PARKING AREA)

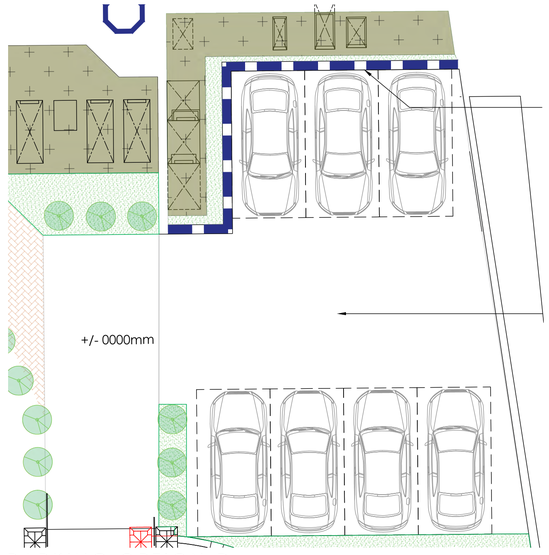


car parking area increased slightly to allow a better parking layout.

inefficient parking layout when trying to utilise the long side of the parking area.this option has been discounted.

turning space/area much better than option B but still not as efficient as it could be.

PARKING OPTION C SCALE 1:100
(WITHIN DEDICATED PARKING AREA)



retaining wall in same location as option C.

turning space/area much more effective and a more efficient use of the space, all achieved whilst keeping the overall space taken up by the car parking to a minimum.

THIS OPTION WILL BE DEVELOPED AND IMPLEMENTED

PARKING OPTION D SCALE 1:100
(WITHIN DEDICATED PARKING AREA)

Rev.	Date	Details	Drawn	Checked

Issued for:

PLANNING

Project/Client: Church of Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD	Project No: 22-111
	Dwg No: A102
	Rev:
Drawing: G.A. Information, Parking Options, Appendix 12 (DAS)	Scale: A/S @A1
	Drawn By: RJ Date: 01/25
	Checked By: Date:

SC1PROPERTY

SC1 Property Limited
The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP.
t: +44 01924 566980
e: studio@sc1property.co.uk
w: www.sc1property.co.uk

© SC1 Property Limited. Contractors must work only to figured dimensions which are to be checked on site.
Registered Office - The Studio, Flockton Chapel, Barnsley Road, Flockton, WF4 4DP. Registered Number - 12338037

STANDARD NOTES
- Contractor must verify all dimensions on site before commencing any work or shop drawings.
- If this drawing exceeds quants taken in any way, the building designers are to be informed before works initiated.
- Only figured dimensions to be taken from this drawing. Do not scale off this drawing.
- Drawing based on Ordnance Survey and/or existing record drawings. - design and drawing content subject to Site Survey, Structural Survey, Site investigations, Planning and Statutory Requirements and Approvals.