

Sent: 14 May 2025 10:43

Subject: 2025/62/90439/E, 2025/65/90441/E Church of the Holy Innocents, Vicarage Road, Dewsbury, WF12 9PD

Dear Edward Cheseldine,

RE: Dewsbury, Church of the Holy Innocents (Grade II, 1858 by *Mallinson and Healey*); Listed Building Consent for conversion of existing listed church to 2 dwellings, forming new residents car park, external amenity spaces and associated works

Thank you for consulting the Victorian Society on this application, I apologise for the delay I submitting these comments. This application was reviewed by the Society's Buildings Committee, a group of architects, historians and heritage professionals. Following their advice we make this **objection** because the proposal would not sustain, conserve, or enhance the significance of the listed building. In our assessment it would cause a high level of less than substantial harm to the significance to the listed building and this harm is not justified

The Church of the Holy Innocents is a Grade II listed building of high significance, designed by the respected Yorkshire firm of architects *Mallinson and Healey*. The church is a particularly fine example of a Victorian church with good details and landmark features such as the tower and spire. In its architectural details it is a good exemplar of how Victorian church architects designed and features such as the window tracery and mouldings all show the input of a talented and experienced designer. Inside, the building also possesses a collection of high quality fittings including altar, pulpit and font that make a strong contribution to the significance of the building. The records of *Mallinson and Healey* are unusually thorough and we know that all the major interiors items were designed by the architect and how long he spent designing them. Unfortunately, since closure the interior appears to have suffered with the removal of some furnishings, but this does not unduly reduce the building's significance. Overall, this is a building of high significance, and certainly of above average interest when compared to other churches of a similar period.

The submitted Heritage Impact Statement is short and does not describe the significance of the building in a manner appropriate to its significance, nor does it properly assess the impact of the proposals. The Victorian Society cannot agree that the proposals would have 'minimal impact upon the heritage asset' or are 'a very sympathetic response'.

The proposed residential conversion of the building would require the subdivision of the building into no2 units, removing any ability to appreciate the interior volume and character of the space along the principal, east-west axis. This would harm the special interest of the building and its legibility as high-quality Victorian church interior. Although some furnishings such as the font and pulpit would remain, the other fine fittings that are original to the building would be lost. This would also harm the

significance of the building as a good example of a substantially complete 19th century church interior, designed by a respected firm of architects. The application contains little detail as to the treatment of the floor, or the impact of the new structure within the building, but a change in floor finishes and structural connections to the fabric have the potential to harm the significance of the building.

Much of this harm is necessitated by the proposed residential conversion as almost any proposal of this nature will require subdivision of the interior and loss of historic fittings. Residential conversion would result in the loss of a community space and your Authority should be satisfied that this is acceptable within local policies before determining this application. The application justifies residential conversion as the only viable option following marketing, but we are not convinced that marketing was sufficiently extensive or targeted to mean that all options are exhausted. The record of enquiries suggests that almost all expressions of interest came through websites focussed on residential property sales. There is no evidence that a national marketing strategy aimed at a wider range of uses was tried, or a strategy aimed at buyers particularly interested in historic buildings. For example the Victorian Society has repeatedly offered to the Church Commissioners to advertise Victorian churches for disposal among our members and newsletter subscribers - an offer which has only been taken up in the last month following a change of leadership in that department.

Aside from the questions over marketing, we are unconvinced that this proposal represents a viable use for the building. In 2014 urgent substantial repairs were estimated at a cost of £400,000-450,000, it unclear if any of these have been undertaken, but if not it is probable that the building's state of repair has declined further and these costs will have increased substantially. The Victorian Society is not convinced that the proposed conversion to no2 4 bedroom units would give a financial return to cover the costs of purchase, restoration and conversion of the listed building. Indeed, the submitted design and access statement includes no information to suggest that substantial restoration will take place.

It is the Society's concern that if this application is approved, the church disposed of, and the acceptability of residential conversion established, then a future application for more intensive, financially viable development will come forward. Considering the harm this proposal would cause (and the unacceptability of the previous refused proposal), it is clear that more intensive development of the building would represent an unacceptable level of harm to its significance.

The NPPF states:

210. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

212. 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

213. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

215. 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.

219. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.

This proposal would not sustain, conserve, or enhance the significance of the listed building. In our assessment it would cause a high level of less than substantial harm to the significance to the listed building. This harm is not justified when there are still questions about whether it has been adequately marketed, or if the proposal would realistically secure a sustainable use for the building. We **object** to the application in accordance with Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021. We recommend that your Authority refuse the application.

I would be grateful if you could notify us of your decision in due course.

Kind regards,

Connor McNeill



**Campaigning for
Victorian & Edwardian
Built Heritage**

Connor McNeill
Senior Conservation Adviser

Tel: 020 8747 5892
DN: 020 8747 5893

Working hours: Monday-Friday 9.30am - 5.30pm
1 Priory Gardens, London W4 1TT
Registered Charity No.1081435. Company limited by guarantee No. 3940996.
Registered in England. Registered office as above.
www.victoriansociety.org.uk