



31/03/2026

2025/62/90889/E – Former Combs Hostel, Hall Lane, Thornhill, Dewsbury, WF12 0PL
Demolition of existing hostel and erection of residential development comprising 34 dwellings

WYAAS Ref: CWY16o

WYAAS have reviewed the the above application. We have reviewed the submitted documents alongside the West Yorkshire Historic Environment Record (HER) and the site's planning history.

The proposed development site is located immediately north of the Thornhill Moated Site, which is a Scheduled Monument (National Heritage List for England No. 1009930) and a designated heritage asset of the highest significance (HER ref: MWY40).

The scheduled area encompasses the moated site of Thornhill Hall, but the wider manorial complex (including outer courts, ancillary buildings, and agricultural processing areas) almost certainly extended beyond the scheduled boundary. Consequently, the proposed development site possesses a very high potential to contain significant medieval and post-medieval below-ground archaeological remains associated with the manor.

WYAAS notes that the applicant has submitted Heritage Impact Assessments. However, these documents do not, or mitigate the impact of the proposed groundworks on the highly probable below-ground archaeological remains.

WYAAS have previously advised on the outline application for this site the same archaeological risks. As a result, the Local Planning Authority attached a specific archaeological condition (Condition 10) to the 2016 outline consent requiring an archaeological evaluation to be carried out.

Recommended Course of Action

The construction of 34 residential units, including their associated foundations, access roads, drainage, and landscaping, will cause massive ground disturbance. Any surviving medieval or post-medieval archaeological remains within the site footprint will be destroyed.

To comply with the National Planning Policy Framework (NPPF), the Local Planning Authority must be provided with sufficient information to understand the significance of any heritage assets affected by the development.



Based on the archaeological potential of the site, WYAAS recommends that a programme of archaeological evaluation is undertaken. These works are necessary to confirm the presence, nature, date, and function of any surviving archaeological remains.

Ideally, given the immediate proximity to a Scheduled Monument, this evaluation should be carried out prior to determination of the application. The results are necessary to inform the planning decision, as the discovery of highly significant manorial remains may require the layout of the 34 units to be amended to allow for preservation *in situ*.

The data obtained from trial trenching is essential to assess the significance of the archaeology and accurately quantify the impact of the proposed development. This ensures the planning decision is based on a full understanding of the heritage assets. Should it not be possible to undertake the evaluation prior to determination, the works could be secured via a pre-commencement planning condition.

However, the applicant should be advised that this approach carries a higher risk. If the post-determination evaluation identifies significant archaeological remains, a further stage of archaeological mitigation (such as open-area excavation) would be required before development could proceed.

Recommended Planning Condition

The WYAAS recommends that should planning consent be granted for the development. This work can be secured by the attachment of a suitable condition to any grant of planning permission awarded. In accordance with the Department of the Environment's Circular 11/95, we recommend that the condition be worded as follows:

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 Investigation

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 the Kirklees’ Planning Department’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.

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: David Williams, West Yorkshire Archaeology Advisory Service: 0113 535 3257”

We would strongly suggest that the developer be 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.

Kind Regards

David Williams

WYAAS Team Manager