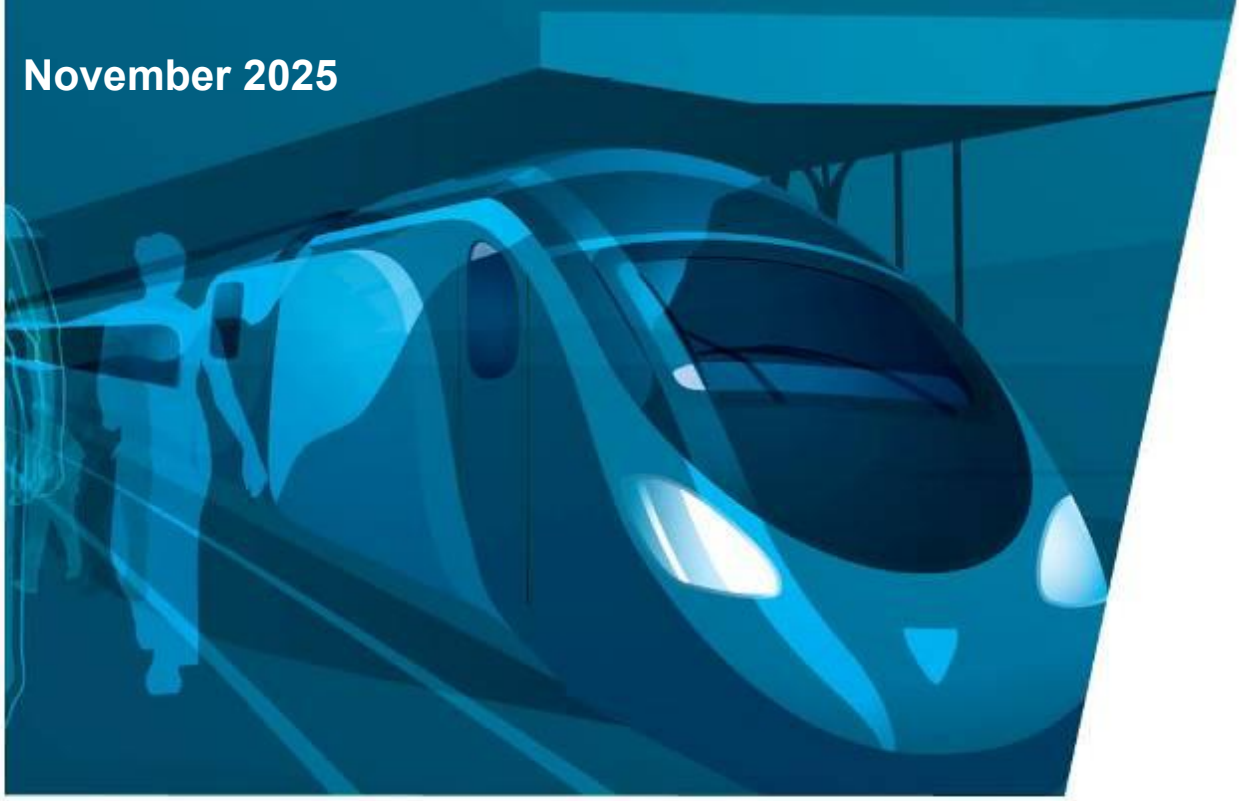
Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order

Justification for Phasing of Conservation Implementation Management Plan (CIMP) for Partial Discharge of Condition

Network Rail

November 2025



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Note: Any sections of the document highlighted in yellow, are formatted as such to denote relevance to a later phase of the CIMP and therefore cannot be completed within the current phase submission. These sections will be completed in later CIMP phase submissions as part of the 'live' document format and are included here as placeholders to indicate intended content for later CIMP phase documents.

1. INTRODUCTION

1.1.1 Network Rail has been granted a Transport and Works Act Order (TWAO) to authorise the Huddersfield to Westtown (Dewsbury) Improvements of the Trans-Pennine Route Upgrade (TRU) programme (Planning Direction for the Order was received from the Department for Transport, referenced TWA/21/APP/03, dated 13 October 2022). The works granted in the Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order are referred to as 'the Order Scheme'. The Order Scheme forms part of a wider TRU programme which will improve the Trans-Pennine railway between Manchester, Huddersfield, Leeds and York and improve connections between key towns and cities across the north of England.

1.1.2 The application under the Transport and Works Act 1992 (TWAO) has been determined by the Secretary of State for Transport. As the proposed works affect a number of heritage assets and pass through a number of conservation areas a series of separate Listed Building Consent applications were submitted to Kirklees Council. Under the TWA (Listed Buildings Conservation Area and Ancient Monuments Procedure) Regulations 1992 these applications were automatically called in and considered at the Huddersfield to Westtown (Dewsbury) public inquiry and were also granted permission by the Secretary of State.

1.1.3 Listed Building Consent for the proposed Order Scheme works at Huddersfield Station was granted on 27 June 2022 (Ref: 2021/91328).

1.1.4 The consent for the Order Scheme requires the discharge of various planning and listed building consent conditions. Condition 5 for Huddersfield Station (see paragraph 3.1.1) requires the production of a Conservation Implementation Management Plan (CIMP) before any works can commence on Huddersfield Station.

1.1.5 A Conservation Implementation Management Plan (CIMP) is a comprehensive document based on a detailed understanding of an historic asset and its significance. It sets out a conservation framework in the context of which the work for the Order Scheme is undertaken. This includes policies to ensure an asset's significance is retained in any future use, repair, alteration, development or management. Where it is not possible to retain an asset's significance, such as through partial or total loss, then the purpose of the CIMP is to set out best practice methodologies for demolition and removal which will be adhered to during the construction works.

1.1.6 The CIMP outlines the best practice methodologies that are to inform how construction works should proceed based on a full understanding of the heritage asset. However, some of the information needed to advise on methodologies for some works, such as repair and reconstruction, are not available until works have commenced. Therefore, a phased approach to the CIMP utilising a partial discharge of the CIMP condition is necessary to create a complete, relevant and high quality CIMP document that informs high quality works appropriate for the Grade I Huddersfield Station and therefore complies with Condition 5 (see paragraph 3.1.1).

1.1.7 This document outlines the justification for the submission of the CIMP document in phases for the partial discharge of the CIMP condition. The CIMP document would be 'live' and continually updated to reflect current understanding of construction methodologies.

1.1.8 Phase 1 of the CIMP was submitted to Kirklees Council on 2 June 2023 under application number 2023/91628 for the partial discharge of Condition 5. The subsequent partial discharge of Condition 5 was approved by Kirklees Council on 27 July 2023.

1.1.9 Phase 2 of the CIMP was submitted to Kirklees Council on 13 October 2023 under application number 2023/93044 for the further partial discharge of Condition 5. The subsequent further partial discharge of Condition 5 was approved by Kirklees Council on 1 February 2024.

1.1.10 Phase 3 of the CIMP was submitted to Kirklees Council on 17 April 2025 under application

number 2025/91093 for the further partial discharge of Condition 5. The subsequent further partial discharge of Condition 5 was approved by Kirklees Council on 9 July 2025.

2. CONSULTATION PROCESS

2.1.1 Stakeholder liaison in conjunction with consultees is an integral part of the development of the CIMP and the decision to include the potential for phasing and partial discharge. The CIMP process has been developed alongside engagement with relevant historic environment stakeholders, such as Kirklees Council and, where required, Historic England. The concept of partial discharge using a phased 'live' CIMP document was first presented to Kirklees Council in May 2022 and confirmed during TRU Heritage Working Group Meetings of 26 April 2023 and 11 May 2023.

2.1.2 The relevant historic environment stakeholders have been engaged on the development of the CIMP through regular meetings (for example the TRU Kirklees Heritage Working Group), which have included opportunities to review and comment on draft document structures, contents, phasing and staging of documents, submission of phases and the presentation of detail on individual methodologies.

2.1.3 The engagement with these consultees will continue to be an integral part of the CIMP process throughout the submission of CIMP phases. This will include, as appropriate, specific meetings to present, discuss and review methodologies, products or issues arising during works, as well as site visits if required to discuss matters and view works referenced in the CIMP.

2.1.4 Phase 1 of the CIMP was submitted to Kirklees Council on 2 June 2023 for the partial discharge of Condition 5, which was then approved by Kirklees Council on 27 July 2023. Subsequently, Phase 2 of the CIMP was submitted to Kirklees Council on 13 October 2023 for the further partial discharge of Condition 5, which was then approved by Kirklees Council on 1 February 2024. Phase 3 of the CIMP was submitted to Kirklees Council on 17 April 2025 for the further partial discharge of Condition 5, which was then approved by Kirklees Council on 9 July 2025. Kirklees Council's response to the Phase 1 CIMP submission and the phased approach to the submission of later Phases of the CIMP is summarised below from their decision notice:

> "*It is considered the proposed phased approach to the discharge of Condition 5 (Conservation Implementation Management Plan) and Condition 2 (Materials) is acceptable in principle for the proposed works at Huddersfield Railway Station.*
>
> *This takes into account the complexities of the works and the subsequent requirement to have a phased approach to construction as outlined in the supporting documents. Officers also acknowledge that where elements may need to be reconstructed or repaired, a full understanding of the construction of specific elements may not be known until deconstruction or repair works commence.*
>
> *Crucially, no works on any element will be able to commence without formal approval based on an up to date CIMP and therefore the full requirements of the CIMP condition can be adequately adhered to through a phased approach which achieves the same level of appropriate control in line with the stipulations of the condition.*"[1]

[1] Kirklees Council. 27 July 2023. Decision Notice Letter (Ref: 2023/91628).

3. PHASED APPROACH AND PARTIAL DISCHARGE OF CONDITION

3.1 Condition Wording

3.1.1 This CIMP partial discharge process has been produced to satisfy the requirements of Condition 5 of the granted LBC for Huddersfield Station (LBC Ref: 2021/91328), which concerns the production of a Conservation Implementation Management Plan (CIMP). The wording of the condition is as follows:

> ***5. (Conservation Implementation Management Plan - Huddersfield Station Environs)*** *No works including any works of demolition shall commence until a Conservation Implementation Management Plan (CIMP) for Huddersfield Station has been submitted to and approved in writing by the local planning authority. The approved CIMP will include as a minimum requirement contents based on the model template CIMP structure attached to this list of conditions. The CIMP will specifically include methodologies for:*
>
> *i) fabric removal, masonry repairs, vegetation removal, repointing, metalwork repairs and application of protective paint systems as appropriate;*
>
> *ii) repairs and strengthening to the existing fabric of the trainshed roof at Huddersfield Station;*
>
> *iii) the deconstruction, storage and reconstruction of the Tea Rooms at Huddersfield Station;*
>
> *iv) the identification of historic elements of the fabric which once removed may be reused or preserved, and a strategy for their storage or reuse;*
>
> *v) any improvements to the setting to sustain, enhance and better reveal the heritage asset affected;*
>
> *vi) details of the maintenance access regime with particular reference to the roofs;*
>
> *vii) dissemination of "toolbox talks" to personnel involved in demolition and construction works;*
>
> *viii) provision of heritage interpretation boards during construction works;*
>
> *ix) the exact affixing details of overhead line electrification; and*
>
> *x) an overarching design guide covering both Huddersfield Station and Huddersfield Viaduct.*
>
> *The works must be carried out in accordance with the approved CIMP unless otherwise agreed in writing with the local planning authority.*

3.1.2 The phased approach to submission utilises partial discharge of the condition to ensure that no works, including demolition, will take place until an updated CIMP has been submitted and discharged. This requires that some approved works commence to inform later stages of the CIMP and allow for a fully complete and approved CIMP document that entirely complies with the specifications of the condition. No works on any element would commence without formal approval based on an up-to-date CIMP with fully informed and precise methodology for the specific element for discharge.

3.2 Strategic Approach of the CIMPs within the TRU Project

3.2.1 The production of CIMPs for the works where Listed Building Consent was required as part of the Order Scheme was agreed between Network Rail and Kirklees Council (with the support of Historic England) in order to provide further design and construction detail pertinent to the impact on the significance of such Listed Buildings. It was acknowledged by way of the LBC

conditions that, at the time of making the Order and associated Listed Building Consent applications, elements of detailed design and specifics of construction methodology were not fully determined. The CIMP was agreed to provide a suitable framework to capture, review and approve such details, within the context of the heritage significance of the Trans-Pennine Route and the individual Listed Buildings affected.

3.2.2 The content of the CIMP will define how the construction of the Order is undertaken with respect to the sensitivity of the historic fabric, character and setting of the Listed Building. The CIMP provides a conservation framework for the duration of the construction of the Order Scheme in the form of an iterative 'live' document which will be added to as necessary during the construction process.

3.2.3 The methodologies and approaches discussed in this CIMP are conversant of the significance of the heritage assets to be affected by the works. The significance of Huddersfield Station is outlined in the CIMP, with further information on its historic context and significance detailed within the Heritage Assessment produced to support the Listed Building Consent application and in the Environmental Statement produced for the Scheme[2]. The structure of the CIMP has been shaped to cover both the items listed in the condition (see paragraph 3.1.1), and the contents tabled at the Public Inquiry and referenced as appended to the conditions.

3.3 Justification for Partial Discharge of Condition and Phased Approach

3.3.1 Condition 5 for the production of the CIMP (see paragraph 3.1.1) attached as part of the Listed Building Consent for the Order Scheme requires approval of detailed design and construction methodology prior to commencement, as this was not fully determined at the time of the granting of the Order. The nature of the Order Scheme in its scale, complexity and the sequential dependency of elements of the programme means that to partially discharge the CIMP document in multiple phases would allow the CIMP to include all required information necessary to satisfy the condition, and best preserve the significance of Huddersfield Station.

3.3.2 Due to required sequencing of the works, it is considered reasonable to agree a phased submission of the CIMP as the necessary information to inform the full methodologies would not be available prior to the commencement of any works to the station. A phased partial discharge is necessary to discharge the condition in a manner which is appropriate and precise to the specifics of the significance of Huddersfield Station.

3.3.3 Pursuing a strategy of a single submission of a CIMP document for Huddersfield Station Listed Building Consent condition discharge would harm the depth of knowledge necessary for appropriate development, a convenient and workable timeline for construction of the Order Scheme and result in potential unacceptable guesswork for later construction methodology. A single submission rather than phased submission, would therefore not properly satisfy Conditions 5 i, ii, iii, iv or v (see paragraph 3.1.1), as there would not be the level of knowledge available to properly discharge these elements.

3.3.4 The CIMP will define the process of how the Order works are undertaken, as detailed by the condition wording that 'the works must be carried out in accordance with the approved CIMP' (see paragraph 3.1.1). The production of the constituent elements of the CIMP document are therefore reliant, in part, on the approval of multiple stages of methodologies and/or on information obtained during different elements of the construction work at Huddersfield Station. Such as, where elements may need to be reconstructed or repaired, a full understanding of the construction of specific elements is unknown until deconstruction or repair works commence. Therefore, methodology for reconstruction and repair, required as part of Conditions 5 i, ii, iii and iv, in some cases must be updated as this information is

[2] Network Rail, 2020. *Network Rail (Huddersfield to Westtown (Dewsbury) Improvements) Order application Environmental Statement, Volume 2i – Scheme-wide Assessment, Chapter 6 – Historic environment*

acquired through commencement of approved works. Consequently, some elements of the CIMP cannot be appropriately completed until other sequentially earlier elements have been reviewed and approved. Similarly, some elements cannot be completed until development of the Order Scheme has commenced and certain construction activities such as building recording, scaffold erection and deconstruction, as approved by Kirklees Council as part of discharge earlier stages of the CIMP, are underway.

3.3.5 Due to the nature of the construction programme and complexities of delivering the scale of the Order Scheme, there are elements of the completed CIMPs that either will not be understood fully until after certain construction activities have commenced or may significantly delay the fulfilling of the Order Scheme in order for the required information to be gathered before works commence. A phased approach will therefore allow for best practice methodologies to be undertaken with the specific significance of Huddersfield Station at the forefront, while also ensuring minimal disturbance to the public in disrupting the Trans-Pennine route. As outlined in the Planning Inspectorate's Report in 2022 the CIMP's purpose is as a quality assurance tool and will secure the quality of the delivery of the works, therefore a phased approach to the CIMP and a partial discharge must be adopted to ensure the quality of work to the Grade I Listed Huddersfield Station is not compromised.[3] The partial discharge of Condition 5 therefore allows for proper compliance with the condition rather than submitting incomplete or unsatisfactory methodologies for approval.

3.3.6 The phased approach will allow for comprehensive understanding of Huddersfield Station before, during and post works commencing and allow for the opportunity to fully engage with the Council and relevant historic environment stakeholders over this period. If new information or understanding is gleaned post-commencement this also allows for an adaptation of methodology to suit, which with consultation with Kirklees Council and relevant historic environment stakeholders, will ensure sensitive and appropriate adaptation underpinned by a full understanding of Huddersfield Station.

3.3.7 The CIMP effectively comprises a 'live' document which is updated consistently prior to, and during, the construction of the Scheme as the necessary elements to be included in the CIMP become available. After each phase of submission, the Council will formally partially discharge elements of the condition, based on the completed content submitted in that particular phase of the CIMP. This process will enable best practice methodologies to be selected for use and be informed by an optimum understanding of Huddersfield Station as the necessary further information becomes available.

3.3.8 The phases of submission for the CIMP will be scheduled to align with the key phases of construction work for the Order Scheme, to ensure that the methodologies relevant to each stage of construction work have been reviewed, approved and the condition partially discharged prior to commencement of each respective phase of construction work. Due to this, the strategy of the production of the CIMP has been shaped accordingly to result in the potential for multiple phases of submission.

3.3.9 The timescales for submission of the phases of the CIMP are outlined within the individual CIMP document, as needed for each specific timescale. The phasing for each CIMP is designed to align with the construction programme, taking advantage of opportunities for data gathering such as during particular blockades, dismantling or scaffold erection where certain elements needed for the CIMP would not have been available pre-construction. The other benefit of alignment with the construction programme is to ensure that the CIMP appropriately captures methodologies which cannot be fully defined until certain elements of the Order Scheme construction at the station have been commenced.

[3] The Planning Inspectorate, 2022. *Report to the Secretary of State for Transport and the Secretary of State for Levelling Up, Housing and Communities (Ref: TWA/2/2/116)*, paras 3.128, 3.199.

3.3.10 As the CIMP would be a 'live' document the phased approach allows for later phase submission of methodologies and design details to be submitted, reviewed and approved while simultaneously allowing for the commencement and continuation of previously formally approved elements. Therefore, potential disruption caused by works to the Trans-Pennine route will be minimised due to efficient project management. Partial discharge of the condition also allows for time efficient production and approval of the CIMP, by ensuring the appropriate level of detail is available for review and approval at each stage, prior to commencing elements of works. This is in agreement with Historic England's representation within the Planning Inspectorate's Report which calls for the timely production and agreement of the CIMP so as to the ensure the high level of detail necessary for methodologies needed to satisfy condition discharge.[4]

3.3.11 The phased approach of submission, utilising partial discharge, would essentially realise the intention of the condition wording (see paragraph 3.1.1), in that the condition would still be partially discharged with respect to each element of construction, prior to commencement of each aspect of relevant works. No works would commence on any element outside of those for which methodologies, materials etc. had been approved via the phased submission.

3.3.12 The strategy of phased delivery of the CIMP and subsequent partial discharge of the CIMP condition has been agreed in principle with Kirklees Council. Engagement is ongoing through the production of the constituent elements of the CIMP, including the presentation of draft content for comment between the formal submission of the Phases of the CIMP. Elements of the CIMP for phased submission will have been discussed and informally agreed as part of engagement opportunities with Kirklees Council and relevant historic environment stakeholders in advance of formal submission (such as at the TRU Heritage Working Group).

[4] The Planning Inspectorate, 2022. *Report to the Secretary of State for Transport and the Secretary of State for Levelling Up, Housing and Communities (Ref: TWA/2/2/116)*, para 6.4.

4. TIMELINE AND CONTENTS OF SUBMISSION OF HUDDERSFIELD STATION CIMP

4.1 Intended content and timeline for Phases of the CIMP

4.1.1 The intended timeline for submission of the phases is as follows, with the specific contents for each phase outlined in the table below:

CIMP Phase No.	Date for submission of CIMP phase to Kirklees Council	Contents of CIMP Phase
1	2 June 2023 (Approved and discharged 27 July 2023)	Enabling works to ensure conservation of Tea Room prior to Roof works: - Deconstruction of the Tea Rooms - Commencement of storage of Tea Rooms Appendix A – Location Plan Appendix B – Conditions Attached to Granted Listed Building Consent (Ref: 2021/91328) Appendix C – Methodology for deconstructing, storing and reconstructing the Tea Rooms
2	13 October 2023 (Approved and discharged 1 February 2024)	Works prior to first blockade, including: - Erection of scaffolding under Roof A - Refurbishment and strengthening of Roof A - Removal of Manchester End bays of Roof A - Works to Penistone Line Canopy Appendix D – D1: Consented LBC Drawings of Known Strengthening Detail; D2: Roof A Trusses Pre-emptive Intervention Proposals; D3: Roof A Columns Pre-emptive Intervention Proposals Appendix E – Design Guide Rev P02
3	17 April 2025 (Approved and discharged 9 July 2025)	Works during and immediately after first blockade, including: - Demolition of signal box / relay room - Demolition of cable gantry - Demolition of Roofs B and C - Piling and foundations for new canopies - Commencement of construction of footbridge - Commencement of works to platforms - Commencement of works to subways Appendix E – Design Guide Rev P03

4	17 November 2025	Works following commissioning of first span of the footbridge, up to the start of the second blockade, including: - Completion of footbridge - Works to new Platforms 5 / 6 - Construction of new canopies - Completion of works to subways - Commencement of construction of Roof A Leeds End extension Appendix E – Design Guide Rev P04
5	Early 2026 (anticipated)	Works regarding the conservation, repair and reconstruction of the Tea Rooms, including: - Storage, repair and reconditioning of the Tea Rooms - Commencement of reconstruction of the Tea Rooms
6	Mid 2026 (anticipated)	Works during second blockade and thereafter, including: - Completion of Roof A Leeds End extension - Construction of OLE - Completion of works to platforms - Completion of reconstruction of Tea Rooms

4.2 Contents of Attached Submission Phase 4

4.2.1 The attached CIMP Phase 4 comprises the following detail needed to satisfy Condition 5:

Conditions met in current Phase 4	Content
Condition 5i	Works following commissioning of first span of the footbridge, up to the start of the second blockade, including: - Completion of footbridge - Works to new Platforms 5 / 6 - Construction of new canopies - Completion of works to subways - Commencement of construction of Roof A Leeds End extension

Condition 5x	Design Guide for Huddersfield Station and Viaduct (*corresponding to those areas of the station covered by the methodologies within this Phase 4 CIMP, comprising the new roof canopies, subways and platforms*) Appendix E – Design Guide Rev P04

4.3 Contents of Previously Submitted Phases 1, 2 and 3

[*Completed from Phase 2 onwards, updated for Phase 4*]

4.3.1 The below table outlines the content of previously submitted Phases of the CIMP, including which conditions the content enabled partial discharge.

Previous Phase No. of CIMP	Conditions met in previously submitted Phase	Content
Phase 1 **(Approved / discharged 27 July 2023)**	**Condition 5iii**	Enabling works to ensure conservation of Tea Room prior to Roof works: - Deconstruction of the Tea Rooms - Commencement of storage of Tea Rooms Appendix C – Methodology for deconstructing, storing and reconstructing the Tea Rooms
Phase 2 **(Approved / discharged 1 February 2024)**	**Condition 5i** **Condition 5ii** **Condition 5iv**	Works prior to first blockade, including: - Erection of scaffolding under Roof A - Refurbishment and strengthening of Roof A - Removal of Manchester End bays of Roof A - Works to Penistone Line Canopy Appendix D – D1: Consented LBC Drawings of Known Strengthening Detail; D2: Roof A Trusses Pre-emptive Intervention Proposals; D3: Roof A Columns Pre-emptive Intervention Proposals
	Condition 5vii	Approach to disseminating Toolbox Talks
	Condition 5viii	Approach to production of heritage interpretation boards during construction works
	Condition 5x	Design Guide for Huddersfield Station and Viaduct (*corresponding to those areas of the station covered by the methodologies within the Phase 2 CIMP*) Appendix E – Design Guide Rev P02
Phase 3 **(Approved / discharged 9 July 2025)**	**Condition 5i**	Works during and immediately after first blockade, including: - Demolition of signal box / relay room - Demolition of cable gantry

		- Demolition of Roofs B and C - Piling and foundations for new canopies - Commencement of construction of footbridge - Commencement of works to platforms - Commencement of works to subways
	Condition x	Design Guide for Huddersfield Station and Viaduct *(corresponding to those areas of the station covered by the methodologies within the Phase 3 CIMP)* Appendix E – Design Guide Rev P03

4.4 Discussion of changes made to previous submission

[*Completed from Phase 2 onwards, where applicable, updated for Phase 4*]

4.4.1 The below table details any changes made to the previously submitted Phases that are not considered new information submitted as part of the current Phase 4.

Previous Phase No. of CIMP	Conditions met in previously submitted Phase	Changes made
Phase 1	***N/A***	*No changes made to methodologies submitted as part of Phase 1 CIMP.*
Phase 2	**Condition 5viii**	Final design and form of temporary heritage interpretation updated.
Phase 3	**Condition 5i**	Additional detail on temporary affixing of scaffolding for Roof A to the station building
		Detail on interface between footbridge and finger canopies, with respect to the footbridge
	Condition 5ii	Details of strengthening to lateral trusses and connections into drivers' welfare building parapet at northern end of Roof A

[*Discussion and justification on the reasoning for any changes to previous CIMP phases, if applicable*]

4.4.2 The Phase 4 CIMP submission includes updated information regarding three elements of the scheme which have already been approved via previous phases of the document and partial condition discharge. These comprise:

- Additional detail regarding the temporary fixing of the scaffolding structure required to facilitate the reconditioning and strengthening of Roof A to the station building, where this may be required.
- Additional detail with respect to the construction of the footbridge regarding the interface between the footbridge and the new finger canopies towards the northern end of the platforms.

- Details of strengthening to the lateral trusses at the northern end of Roof A and their connection into the parapet of the building currently used as a drivers' welfare facility, required as part of the refurbishment and strengthening of Roof A, in the context of the construction of its northern (Leeds end) extension.

5. CONCLUSION

5.1.1 To ensure the works granted in the Order Scheme are carried out in a manner that allows for appropriate care to be taken in the development of Huddersfield Station, as well as causing minimal disruption to the Trans-Pennine Route, a partial discharge of the CIMP is needed to satisfy Condition 5 of the granted consent.

5.1.2 The scale and complexity of the Order Scheme means that the submission of the CIMP document over multiple phases is vital. To submit as a single document without the appropriate level of detail needed to satisfy Condition 5 would be detrimental to the quality and smooth undertaking of the construction of the granted Order Scheme and would impact the significance of Huddersfield Station.

5.1.3 The submission of the CIMP in phases, accumulating as a 'live' document will serve to ensure that works are undertaken with all pertinent information and ensures the impact on Huddersfield Station is consistently and thoroughly recorded and managed. This process will enable Kirklees Council and the relevant historic environment stakeholders to carry out the highest level of scrutiny and detail review. The Council will be consistently involved throughout, with requests for formal approval to be achieved within an agreed timeline for commencement and continuation of works.

Network Rail
Waterloo General Office
London
SE1 8SW

www.networkrail.co.uk