



Ms Emma Howson
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8 October 2020

Dear Ms Howson

Arrangements for Handling Heritage Applications Direction 2015

ST ANDREW'S CHURCH, CHURCH STREET, KIRKBY MALZEARD Application No. 20/02721/LB

I write to summarise Historic England's position on the proposals for the graveyard wall to the church of St Andrew following our video call with the project's engineers on 21 September 2020; our phone call with your authority's conservation officer on 25 September 2020; our phone call on 29 September 2020; and by email on 30 September. Additional information was presented to us during the video call provided by Mason Clark Associates, and again by email. We make the following comments:

Significance of the heritage assets

We previously responded to this application on the 1 September 2020 where we gave our advice on the heritage significance of the Grade I church of St Andrew and the curtilage listed graveyard wall.

While the material, character, age and appearance of the graveyard wall are all important considerations, its heritage significance cannot be fully articulated without understanding its context, development and relationship with the associated church. It is considered that this graveyard wall contributes significantly to the setting of the Grade I church and plays a very important role in the absolute demarcation between secular and sacred spaces within the village. The wall is a fundamental part of how the church is experienced, and its appearance and homogenous fine character contributes greatly to this.

Impact of proposals

As the physical delineation of consecrated space, the form, magnitude and materiality of a churchyard boundary contributes significantly to the heritage interest of the church. Changes to its character and appearance, including the introduction of permanent visible remedial measures, need careful consideration if its special interest is to be maintained. From the information presented, the proposed approach to these



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works will have an impact on the experience of the site and therefore would cause harm to the significance of the Grade I church and curtilage listed graveyard wall.

Our previous response advised that the visible presence of the proposed pattress plates would contrast with the existing materiality of the wall and would draw the eye to the new structural intervention in an undesirable way. This, it is considered, will erode the wall's historical character and is not compatible with the exceptional heritage interest of St Andrew's Church.

Balancing heritage and structural considerations

The most appropriate structural solution will be one that fulfils the structural needs of the project and also causes the least harm, ideally no harm, to the significance of the heritage assets, in accordance with the NPPF paragraph 193 and 194.

We do not view heritage and structural considerations as incompatible with each other or mutually exclusive.

Consideration of alternative options to pattress plates

We understand that the use of pattress plates was proposed as an immediate response to the vehicular collision with the graveyard wall. Pattress plates were therefore considered to be a quick solution to stabilise the adjacent 30m stretch of wall.

However, as there has been a substantial time lapse between the initial vehicular collision and the submission of this planning application, we are of the view that a reassessment of the proposed methodology for remedial works is entirely appropriate.

Given the sensitivities of the site we are of the view that all potential structural options should be fully considered, with a solid evidence-base underpinning the decision-making process. This is to ensure that great weight has been given to the conservation of the heritage assets and that harm arising from the structural intervention is accurately and coherently articulated to ensure that it is clearly and convincingly justifiable.

Monitoring and Investigative works

We are aware that there has not been any form of formal continuous monitoring undertaken on the 30m section of wall after the vehicular collision. We understand that a one-off visual site assessment was made approximately six months prior to the submission of the planning application to look for visual cracking within the graveyard wall. As such, there appears to be no evidence-base which details whether the 30m section of wall proposed for remedial works has shown movement in any extent. This, therefore, brings into question the justification for the proposed remedial works in their current form.





Investigative works to determine the substrate of the historical wall have been undertaken which, as discussed, were to inform and clarify the direction and approach to the permanent remedial works to the 30m stretch of wall.

We are very disappointed to understand that these investigations were limited to the 10m section of the wall which has been recently rebuilt. The 30m section of the historical wall has not been investigated. We consider that the investigative works have been so limited that they have not fulfilled the purpose of understanding the substrate of the historical graveyard wall. We consider this a missed opportunity to bring much needed clarity to this project.

Next Steps

We are very concerned that at this point in the development of the proposals, alternatives to the use of pattress plates in such a sensitive location do not appear to have been seriously explored.

No further evidence-base has been provided which gives clear and convincing justification for the harmful form of the currently proposed remedial works, as is required by the NPPF paragraph 194.

We believe that the use of an alternative, less visually intrusive approach should absolutely be given serious consideration and evidenced as part of reasoning for the preferred approach. Manufacturers of structural products and systems, such as those previously suggested, are often willing to provide an assessment of whether their product is suitable on any given site.

Given that these remedial works will be a permanent intervention which affects the long-term future of the graveyard wall and the church of St Andrew, we remain concerned regarding the application on heritage grounds. Nonetheless, we are of the view that there remains an opportunity here for a collaborative, transparent and open working relationship in order to positively engage with the structural challenges this site brings.

Hopefully this will be useful to you and the Project Team in formulating future discussions.

Yours sincerely

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