

<b>Consultee Response</b>	Built Historic Environment
<b>Consultee</b>	Jane Corfield
<b>Response Date</b>	28.05.2026
<b>Reference Number</b>	25/LBC/00515
<b>Location</b>	Former Tunstall Library and Baths, Drill Hall and 17-19 Greengates Street, Tunstall, Stoke-on-Trent
<b>Description</b>	Proposed selective demolition, extensions, elevational alterations, external stores and sub-station enclosures, and associated internal interventions (Listed Building Consent)
<b>Case Officer</b>	David Clarke

### Relevant legislation, policy and guidance:

*Planning (Listed Buildings and Conservation Areas) Act (1990)*

*National Planning Policy Framework (NPPF) (updated February 2025) (chiefly chapters 12 and 16)*

*Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 (adopted 2009) (chiefly policies CSP1 – Design Quality and CSP2 – Historic Environment)*

*Newcastle-under-Lyme and Stoke-on-Trent Urban Design Guidance SPD (2010), (chapter 9 of which deals with the historic environment).*

*National Design Guide (2021)*

### Comments

#### Design

Policy CSP1 – Design Quality of the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 states that:

*New development should be well designed to respect the character, identity and context of Newcastle and Stoke-on-Trent’s unique townscape and landscape and in particular, the built heritage, its historic environment, its rural setting and the settlement pattern created by the hierarchy of centres.*

Detailed advice on how to achieve the design quality in CSP1 was published in the Newcastle-under-Lyme and Stoke-on-Trent Urban Design Guidance (UDG) (2010), chapter 7 of which offers residential design guidance. Clearly this document is dated, and the current NPPF chapter 12 and the National Design Guide (2021) must take precedence. I suggest, however, that common principles are shared by all three documents. The following table is indicative, not exhaustive:

<b>UDG Chapter 7</b>	<b>NDG</b>	<b>NPPF</b>
R1 R2 R3	Para 40	Chapter 12 para 134
R4	Para 52	
R5, R6	Paras 67,68,69	
R7,R8	Paras 129, 130,13, 132,133	
R9, R10, R11	Paras 84.85.86.87.88.89	

R12, R13, R14	Paras 52 53	
R15, R16, R17	Para 123, 124	
R18	Para 134	
R19	Para 126	
R20	Para 120,124	
R21	Para 54	

### **Evaluation**

Stoke-on-Trent precedents for the conversion of large, listed buildings into residential use include former pot banks such as the Fountain Works, Lock 38, (Twyford's) and Joiners Square Works. Some of these developments are for Housing Associations, some for private rent, demonstrating that listed buildings can work for different populations and financial models.

The constraints presented by these sites, together with the date of their conversions (before current advice and policies) mean that the listed building schemes may not provide the level of amenity that a purpose-built development can. Within the planning balance, some compromise is accepted because finding a new sustainable use for a listed building carries considerable weight. It is understood that distances between existing buildings are not easily altered and designs that achieve privacy by providing window louvres or similar are acceptable. The constrained urban site in this case means that external residential amenity is also limited, but the site is close to a park which means that overall, this too is acceptable.

This application, however, also represents a very high level of compromise with regard to the internal amenity of its occupants, and too many of the apartments do not comply with the principles of good design expressed in local and national policy. Specifically, some apartments do not have any outlook, others have very low ceilings (less than 2.1m), and some are not large enough to have a double bed. These facts are contrary to statutory guidance within the technical housing standards (Nationally Described Space Standard – NDSS - 2015) and, therefore, not consistent with advice from Historic England (Heritage Works for Housing 2024) regarding the conversion of listed buildings without “robust” justification.

Examples showing poor amenity and outlook:

#### **Library Building - Amenity**

The floor to ceiling height on drawing 2620 - L-3-23F for the first floor is 7285mm-4800mm = 2,485mm including floor construction depth, which scales off at 242mm = 2243mm. Level 1.1 is 9510mm-7285mm= 2,225mm. Minus 242mm = 1983mm.

This suggests that the floor to ceiling height is less than 2100mm above the new mezzanine. Whilst the accepted industry standard is 2.4m (which is why materials such as plasterboard are made to this dimension), there is no building legislation that sets the minimum ceiling height of a habitable room. However, for habitable spaces like living rooms, bedrooms, and kitchens, building regulations suggest a minimum floor to ceiling height of 2.1 metres. While this is technically permissible, it is far below what most people consider comfortable for a habitable room. According to the UK's national space standard, at least 75% of the gross internal area should have a minimum floor-to-ceiling height of 2.3 metres.

Again, not a standard for good design, more a suggested level of acceptable provision. Level 2 has a ceiling height of 2,183mm so also does not comply with the NDSS.

The division of the existing windows and library building provides flats to the second floor that have natural light via the rooflights, but no windows, given that the small part of the second-floor window available is at lower leg height. I consider that this is not a reasonable outlook and, therefore, contrary to UDG policy R19.

### **Baths and Fire Station – Amenity**

The flats formed out of the former dance studio BG002 are very poor. The window cill heights are at eye level meaning that there is no outlook. The bedrooms can only take a single bed (not compliant with the NDSS) which are unrealistically shown as bunk beds. Also, these rooms are less than 2.55m wide (not compliant with the NDSS) and poorly shaped.

These issues are repeated on the first-floor single bed flats.

There is limited light and outlook to the living areas on the second floor.

These issues need to be taken into consideration, balanced with the retention of the Heritage Assets as set out in the advice below.

Heritage Works for Housing, (Historic England Advice and Guidance), published in 2024 examines the complexity of converting listed buildings to residential use. Two common issues are space standards:

*Floor-to-ceiling heights and layout constraints – Some historic buildings may have non-typical floor-to-ceiling heights. If floor-to-ceiling heights are too low, significant intervention may be required such as the removal of every other floor, as was done at the Grade II-listed Stanley Dock Tobacco Warehouse in Liverpool. If floor-to-ceiling heights are too high, then the building may be less energy efficient. However, large floor-to-ceiling heights provides opportunity for the introduction of mezzanines and duplex apartments.*

*Sub-division – How the building is sub-divided into multiple homes needs to be carefully considered. This should balance a consideration of the original planform and where the special interest of the building lies against market expectation, regulations, policy and guidance. Unless there is a robust justification, all residential developments are expected to comply with nationally set space standards (MHCLG 2015), including those created through permitted development rights.*

This lack of outlook and poor amenity for some of these flats seriously undermines the public benefit of housing delivery in my opinion.

The poor quality of the design solutions with regard to the insertion of the mezzanines that lead to the bisection of windows and original features, together with the lack of detailed information around the lift and main staircase also mean that opportunities to demonstrate sensitivity and reduce harm to the heritage asset have not been taken. The disconnect between the heritage impact documents and the drawings means that the mitigation suggested in the former is either missing or not meaningful.

The lack of detail regarding new elements such as railings, materials for the new front door and confusion regarding stained glass windows mean that this application fails to clearly demonstrate respect for the character of this important part of Tunstall's built heritage and it is therefore not compliant with CSP1.

## Heritage

Core Spatial Strategy Policy *CSP1 – Design Quality* is cited above and is also relevant to the following comments. Policy *CSP2 – Historic Environment* states that:

*Both Councils will seek to preserve and enhance the character and appearance of the historic heritage of the City and the Borough including buildings, monuments, sites and areas of special archaeological, architectural or historic interest.*

## Evaluation

Unfortunately, the information presented in this application is confused, incomplete and sometimes contradictory. The submission has become overly complex and impossible to navigate. This is because the drawings are not annotated with simple intentions such as “New works to match existing” and there are no simple “as existing” drawings for the doors and windows meaning that comparisons with proposed works are impossible. Drawing quality is an issue, when this was raised with the applicant they sought to distinguish between “illustrative” and “technical drawings”. This response does not address errors.

The drawings are not consistent with each other or with the schedules. There are no keys. If blue lines indicate new work, there is no explanation what they represent. The presentation looks rushed – spelling mistakes, duplication of furniture and text in error.

Taking 10 drawings at random, the issues set out below arise. Each thing individually is very minor, but the effect of having so many minor errors, is to lose confidence in the buildability of the scheme and to lose track of precisely what is seeking consent.

- **L-3-42 REV 2620 C**
  - Why some roof lights shown and not others? What does blue line on inside of some windows but outside of others mean?
  - Why do the windows all have 1,2, or 3 grey lines to inside?
  - What are doors D263 and 264 for?
  
- **L-3-41 2620 D**
  - There are two beds in a single bedroom, flat 9.
  
- **2620 - L-3-37 C**
  - Why is insulation shown in section and not in plan?
  - New Railing is identified but not drawn.
  
- **2620 - L-3-34 B**
  - Spelling mistakes in text
  
- **2620 - L-3-33 D**
  - Detailed drawing needed showing fixings of glazing to handrail.
  
- **DH-3-17 2620 C**
  - Text and numbers overlaid

- **2620 - DH-3-11C**
  - Windows to terraced house shown removed and replaced, contradicting door schedule which says retain.
  - Existing windows are not hardwood.
  
- **DH-3-14 2620 C**
  - Windows noted above shown simultaneously retained and replaced on different layers.
  - Window notation obscures window elevation so design not legible
  
- **2620 - DH-3-09 C**
  - Notation of “new lintel to match existing” repeated twice.
  - One arrow showing plain brickwork.
  - Notation of “high quality window to match existing” indicates a window that does not match existing, it has a different elevation.
  - No sections of existing and proposed are shown.
  
- **2620 2620 - DH-3-09 C**
  - States all windows to be replaced. Window schedule indicates windows to first floor to be retained.

I assume that there are other errors on the drawings but have limited time to check all of them.

Generally, repairs to building are not explicit which is a lost opportunity to justify the proposals. The window condition report refers to sashes on library frontage. Where are these? They are described as casements in the Heritage Statement. I do not recommend that this is an approved document.

The sample specification should also not be an approved document. Sealing brickwork is seldom a positive intervention in historic buildings and not recognised as good practice.

### **Library Windows**

**Drawing 2620 - L-3-23 F** - Library window details show different windows in elevation to the ground floor when compared to **2620 - L-3-37 C**. The drawing at scale 1:25 shows a different window to that drawn at 1:2. The detail at 1:2 shows opening lights either side of the mezzanine, but the 1:25 elevations do not. Windows to the first floor are shown differently on each drawing, **LW166 etc** having 3 horizontal elements on **2620 - L-3-37 C**, but only 2 on **2620 - L-3-23 F**. Drawing **2620 - L-3-82 A** suggests retention of small glazing panes to upper hopper window retained, but other elevations do not. For this reason all “non-technical” drawings should be omitted from the application.

It is not clear how the rooms are ventilated. The top floor has opening lights, but the others do not. This is of interest for a listed building application because if mechanical ventilation is necessary, vents or grilles to the exterior may also be necessary and will need to be shown. The window schedule does not show this. Trickle vents are shown on the detailed window sections, but the convention showing the opening light is on the second floor only. The other floors do not show this, so assuming these windows are not openable, is the insertion of an opening light on the first floor for means of fire escape? If this is not the case, can the original glazing pattern be retained?

The labelling of the windows interferes with their appearance, so the impact of the re-fenestration is difficult to read. It is not clear if any windows have opaque glass. It is very unlikely that the existing windows are hardwood. Most windows of this type have softwood windows and hardwood cills.

**Drawing 2620 - L-3-24 A** is ambiguous regarding the retention of the stair windows with stained glass. The drawing does not make it clear if the stained glass is to be removed and replaced with new doubled-glazed units, leading to an inference that they would only be replaced if damaged.

*Existing window kept as is, damaged timber pieces or glazing units to be detailed as shown in detail drawing.*

I cannot, however, see any timber “pieces” in the original window. In my opinion this drawing is not fit for purpose. I do not know what ABC and D relate to. There is no section showing the window at floor level as the photo below. D seems to suggest an opening light. The wall is insulated in the detailed section, but not on the other sections. A note on the drawing says all windows are to be replaced, contradicting the other notes.

The drawing **2620 - L-3-24** shows a new timber hardwood window in detail that is not then shown in section or elevation. The section through the building shows no existing timber subframe and is hard to read.

The heritage statement by Donald Insall contradicts all of this by saying that the windows will have secondary glazing, preserving the originals.



**Photograph 3.4.75 in the heritage statement** seems to suggest non-openable fixed leaded lights into sandstone with a decorative wrought iron grille in front. This area is high in significance according to the statement, but the drawings suggest complete removal despite contradictory text. I conclude that the drawing does not support the heritage statement and the works are harmful to the significance of the building. The **room detail sheet for LS001** does not comment on the windows. **Donald Insall Room- by-Room Assessment of Impact for F001** (the same room) does not mention the windows. The window schedule does not mention these windows.

**Drawing 2620 - L-3-37 C** has no key. The retained windows to the ground floor have no window numbers in elevation so cannot be related to the window schedule; although the reference plan has numbers, these are also not on the window schedule. Assuming that blue signifies new work, the

new windows now do not relate to the proportions of the existing ones, nor do they relate to the features expressed on the existing and retained sandstone mullions between the panes. If the windows do not open then, from a listed building perspective, it would be better to retain the original window pattern and address the mezzanine in a different manner. For this reason, it would be useful to understand if these drawings are building-regulation compliant.

The potential heritage impact of changing windows to a listed building is high. An assessment of the significance of a window or windows and the contribution they make to the overall significance of a building is the key first step in deciding the right course of action. Surviving historic fenestration is an irreplaceable resource which should be conserved and repaired whenever possible. The significance of a historic building, both as a whole and in terms of its constituent parts, can be assessed by considering its heritage values, using the framework set out in *Conservation Principles* (2008). The Library Room-by-Room Heritage Impact Assessment does not discuss the impact of the proposed changes to the windows in detail. The heritage statement rates original windows to the principal library building as high on the first floor, however, it also seeks to support the change as follows:

*The windows across the building have been found to be in a varying condition, with a number lost and some previous poor replacements. The window survey demonstrates that windows to the ground floor are in relatively good condition with limited minor repairs such as cill replacement required. The condition of windows deteriorates higher up the building with the first floor windows already having to have been removed for safety reasons owing to their poor condition. As such it is proposed that the opportunity is taken to replace those in poor condition with a higher thermally performing timber window with slimline double glazing. Lower windows are proposed to be reglazed with 8.3mm vacuum glass and have an additional transom aligned to maintain a more authentic relationship with the duplex apartments proposed internally. As largely single pane, simple casement windows historically which allowed the architectural detailing of the brickwork to dominate, it is considered that this would not cause undue harm to the appearance of the building. A greater degree of subdivision would be maintained to the replacement arched windows at second floor and the decorative leaded window to the principal staircore would be retained (with secondary glazing behind). Replacement of the remaining complementary lead detailing to the street-facing first floor windows with single panes would see the loss of some decorative detail, however this must be considered inline with the overall improvement that a consistent window design would bring to the appearance of the facade.*

Whilst I understand that some windows are in poor condition, this fact does not in itself justify a replacement window with a different glazing pattern. The second-floor windows will not have a greater degree of subdivision as stated and have a very different set of proportions to the other windows. All three floors have different windows in the proposal and they do not have a “consistent” window design. The loss of the decorative stained-glass window to the side elevation facing Scotia Road (LW186) is regrettable and not explained.

Generally, it is difficult to assess the impact of the change to the windows on the significance of building because there are no drawings showing the original profile of the mouldings and frame sizes for the windows and how these compare to the new windows. If they match, then there is a greater level of consistency, but if they do not, the retained windows to the ground floor will appear different to the others, possibly causing harm to the significance of the building.

#### **Library Doors**

The Library Room-by-Room Assessment of Impact addresses doors individually. Normally a listed building application would assess the importance of doors by a defined set of criteria; usually this is set out as a hierarchy, such as original panelled doors with fanlights are rated as high value, modern replacement fire doors low value. There is no criteria for such an appraisal within the documents so it is very difficult to determine if the best features are being retained. The reference plans do not have room numbers which means it takes a long time to cross-reference them.

**LD075** needs an additional drawing with more details given the impact of this change and its location.

**2620 - L-3-24A** does not indicate material for frame or need for manifestation to comply with Building Regulations.

**LD011** is not drawn accurately in the elevation drawing, this a panelled door.

The floor plans do not show the same room numbers as the heritage assessment making it hard to use.

The entrance lobby with lift is shown as a protected lobby on **L-3-40-2620 – D**. This suggests fire protection. LD003, LD005 and attached screen form part of this lobby, do they need to be made fire resistant? If a fire started at the front desk, how would the staircase be protected? It is important to understand how the original joinery will be affected by the regulations. Also, the distance between the back of the lift and the door swing to LD004 seems small for the number of people escaping through this route. It is hard to assess the impact of Building Regulations and means of escape in fire on the original joinery. Are these Building-Regulations compliant drawings?

Looking at the Room-by-Room Assessment of Impact, and taking LG001 and 2 as examples, LD006 is shown as openable on **L-3-40 REV:2620 – B** and fixed shut on **2620 - L-3-46 C**. Drawing **2620 - L-3-47A** also shows LD006 as shut. This would mean according to **L-3-40 REV: 2620 – B** the Café is not accessible because it has no doors. The proposed east wall shows LD006 replaced with LD043, a fire door. The plan shows this to be on the west wall, not the east wall. In summary the drawings show this door to be fixed shut, openable and replaced simultaneously.

Moving to a different room, LD008 is to be reused and partnered with LD101 as possibly duct doors – although it is unclear what they are for on the plans. LD101 and LD 008 are to be removed and reused as LD264 and LD263 according to the door schedule.

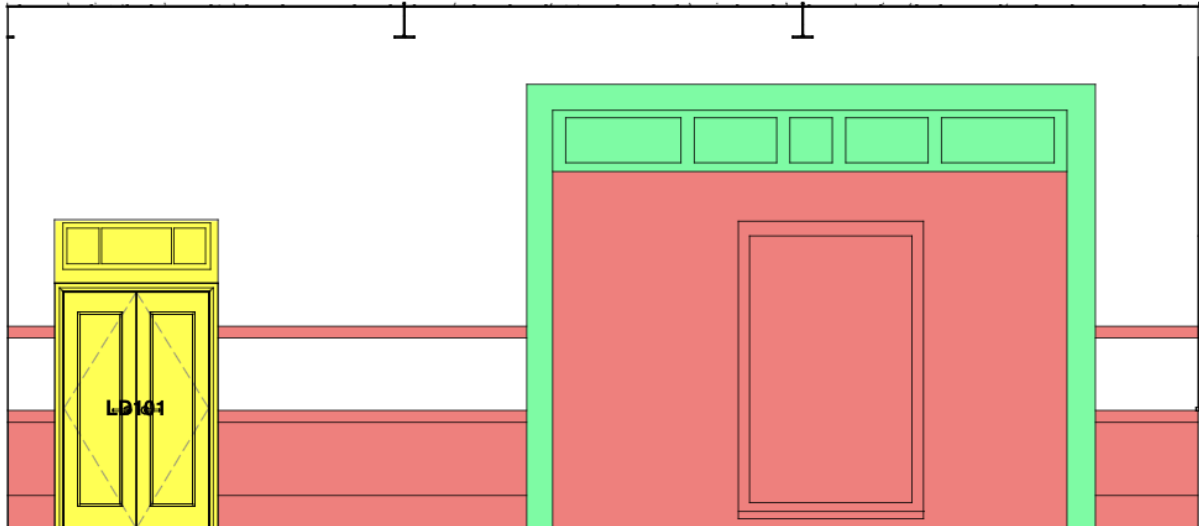
LD101 looks like this in the heritage statement:



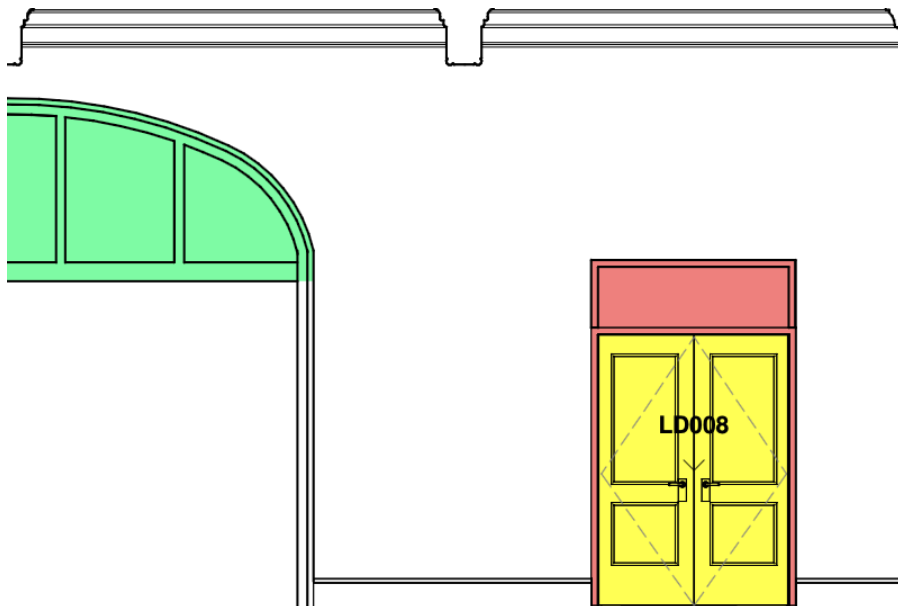
A pair of double doors with raised and fielded panels below glazing, itself probably replaced with a board based on the fact that the statement goes on to say that these doors match those to FO14 which are glazed.

This door is shown incorrectly as fully glazed or panelled, not as photographed.

LD101 door and frame removed and reused in LS007 (as LD264). Wall panelling dado rail, pipework and conduits all removed. Roller shutter and chalk board removed with frame around shutter retained



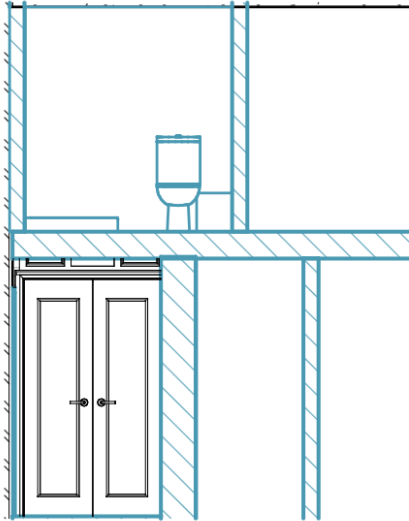
LD008 is shown as



A photograph of this door shows it to be modern and not matching LD101. Why has it been saved? Why has it been placed opposite a door of differing design? These doors will look mismatched and, given there is no clear reason for retention of the modern door or strategic approach, they will not conserve the significance of the building.

According to the heritage statement, the door to FO14 which does match LD101 is now called LD100 and is to be moved to S007 a corridor on the second floor. However, the door schedule indicates

that the door is not reused. This is then contradicted by the room detail sheet that shows it retained, but fixed open and a new mezzanine built across the fanlight. The Room-by-Room Assessment of Impact fails to mention the fact that the floor goes across the fanlight meaning that it won't be seen as the two elements collide.



## 11 West Wall

### Library Internal features - assessment of impact

G001 – insertion of lift. This is assessed as moderate in the Room-by-Room Assessment of Impact, but I do not agree with this statement for reasons given in my comments of 07.04.26. In my opinion this needs a drawing not a photograph.

The glazed insert referred to with regard to mezzanine in G017 and G018 is not drawn as such in the technical drawings.

Screen and door LD107 are retained but are severely affected by the insertion of the floor. The glazed screen is not practical at bedroom level - would it comply with Building Regulations? Would an additional rail be needed? A junction detail is needed. I do not agree with the assessment of harm.

Generally, the **LF002 room detail sheet** is indicative, giving a misleading impression regarding the windows. The windows are to be replaced – what part is to be retained?

The photographs on proposed plans **2620 - L-3-03 D** are also misleading, showing floor cut-aways next to windows.

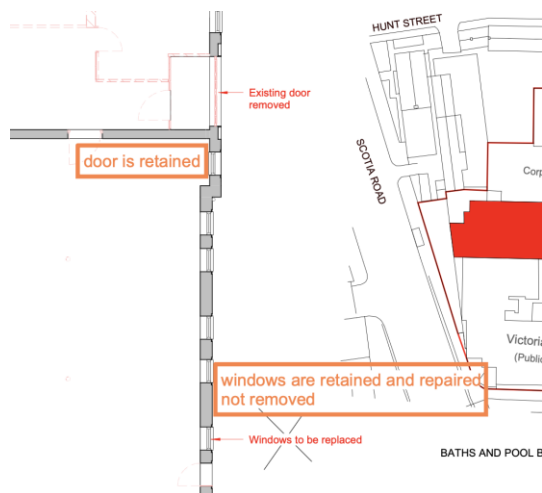
### Baths and Fire Station

#### **Windows**

Window numbers are written across windows on drawing **2620 - B-3-26 REV: E** and others, including **26C**, so they are not clear.

The **window schedule** does not specify the material of the new large windows to the front elevation. **2620 - B-3-26 REV:C** does not specify the window. This is important as the front elevation (including the front door) is identified as having high significance and described as “complete” in the heritage statement. The loss of the original front door is, therefore, regrettable and not yet justified nor the new window defined. These doors should be re-used in-situ or elsewhere in the scheme. The new rooflights should be centred on the windows below them as this is a symmetrical design. BW15 is a modern infill and does not match the original profiles of the retained window. The profiles and frame thickness of BW16 is not defined. Is this a third type of window? Drawings of new windows and originals are needed to show impact on front elevation.

Demolitions drawing **2620 - B-3-08D** has contradictory messages rather than amended drawing causing confusion.



### **Doors**

There is no door schedule to indicate the retention of any original doors

### **Staircases, Joinery including screen and fireplaces**

These items are all removed except one fireplace. No original character is retained to the interior of the front wing. This is more than minor harm.

Exemplar changing rooms kept at poolside.

### **Boiler house Chimney**

Awarded high significance by the impact assessment, this is retained.

### **Drill Hall (not listed).**

This building contributes to the character and appearance of the conservation area and to the setting of the adjacent listed buildings.

### **Windows**

The labelling of the windows interferes with the appearance of them, so the impact of the re-fenestration is difficult to read.

DW21,23, and 08 are poorly drawn if the window schedule is correct and they are to be retained.

DW 07 would be improved if a window was inserted into the door as at Burslem Fire Station. This would avoid a poor copy.

## Conclusion

The application contains information which must be cross-referenced across 4 different sources and, unfortunately, is not consistent, sometimes contradictory and very time-consuming due to different numbering or references. Crucially the information in the heritage impact assessment is not the same as the information in the drawings.

This means that the impact of the proposal on original features does not seem to be reflected in the assessment accurately. Without mitigation, this application in my opinion represents the upper end of less than substantial harm.

Removing original doors and windows from principal elevations that are rated as having high significance within the applicant's own submission is harmful, the impact of the lift is harmful, and the erosion of the plan form is harmful. It is regrettable that the drawings do not support the mitigation suggested in the heritage impact assessment. Examples of this are the treatment of the mezzanine as it meets the window, lack of design drawings for the lift and staircase, and failure to retain and protect the stained glass in the circulation spaces. The loss of historic character is marked. Even where original features are retained such as doors and fanlights, the ceiling simply slices across them without a design solution meaning that context is destroyed. Lack of narrative regarding retention means that modern artifacts are preserved alongside original features in spaces where their significance is impossible to interpret.

Having identified that the application is harmful and the disconnect between the heritage impact assessment is clear, I do not think that this application is sufficient to allow the assessment necessary under paragraph 208 of the NPPF.

Given the number of errors in the application especially those regarding the retention or removal of original fabric, I also do not think it possible to determine this application in accordance with paragraph 210 of the NPPF.

There is also no narrative, explanation or justification for some of the works. There is no document that identifies the public benefits of the scheme making evaluation under paragraph 215 of the NPPF impossible. As discussed above, the benefits of good design and housing supply are seriously undermined by non-compliance with the NDSS meaning that in my opinion the community and economic benefits would need to be exceptional.

It is very disappointing after such a long period of negotiation to have such a poor application that lacks clarity to the extent that it would be very difficult to determine exactly what the works to these buildings would be.

Based on the current submission and the details / documents you have reviewed in your capacity as consultee, please confirm your position by completing the below:

**Do you object to the proposal? \***

**Yes**

**Ne\***

If the answer is yes, please ensure that your consultee response clearly sets out why with reference to relevant planning considerations.