

Planning Department
Staffordshire Moorlands District Council
Via Email

2 December 2025

planning@staffsmoorlands.gov.uk

Dear Arne Swithenbank

RE: SMD/2025/0466 (JCNAS 212474) | The Morgue, Villa Road, Cheddleton, ST13 7EA (Curtilage listed; Grade II, 1895–1899). Listed Building Consent – Alteration. Change of use of former morgue building to single holiday-let unit.

Thank you for consulting the Victorian Society regarding this application. We write to advise on the proposed works at the Morgue, Cheddleton. While we appreciate the desire to bring the building back into use, any development should be informed by a meaningful assessment of the building's heritage significance, alongside clear evidence of its existing condition and any proposed demolition works.

Significance and Harm

The application concerns the Morgue, which was constructed between 1895 and 1899 in conjunction with the North Staffordshire Asylum, to the designs of Giles, Gough and Trollope. It lies adjacent to the Grade II listed St Edward's Hospital Chapel, with which it is curtilage listed. Like the Chapel, the Morgue's compact and robust Gothic character is expressed in a single red-brick storey beneath a pitched slate roof, with overhanging eaves and terracotta ridge tiles. The building is entered from the east through a pair of arched timber doors set beneath a tripartite pointed fanlight and shallow arched moulding. Two further external doors lie to the south and west, alongside six windows, including a dormer lantern.

The proposal seeks to convert the building into a holiday let through a series of internal alterations, including the installation of a mezzanine floor and new stair. Externally, through the demolition of an existing window and the insertion of a new door in the north elevation, a new window in the south elevation, and what appears to be the replacement of glazing to the external doors on the west and south elevations.

**Campaigning for
Victorian & Edwardian
Built Heritage**

The Victorian Society

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Patron: HRH The Duke of Gloucester KG, GCMG
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A heritage assessment has been submitted as part of the application; however, it contains no architectural description, no identification of heritage values, no assessment of the building's contribution to the wider asylum group, no consideration of rarity, no analysis of the impact on the setting of neighbouring listed buildings, and no statement of significance. As such, the document does not meet the requirements of an Assessment of Significance as set out in the NPPF and Historic England guidance. It is therefore not possible to fully understand the extent of harm that would be caused by the proposed changes.

Furthermore, much of the remaining planning information is also inadequate. The submitted drawings do not show the new mezzanine floor, provide minimal detail regarding changes to the glazing in the existing doors, and do not clearly record the proposed demolition and strip-out of existing fabric; nor the materials and conservation methods intended to be employed. Consequently, there is a risk of unnecessary loss of historic fabric—particularly historic glazing—where any upgrades should instead prioritise sensitive repair or secondary-glazing solutions, supported by a detailed condition survey and clear justification. Historic England publishes substantial guidance on the repair and energy performance of historic windows, which can be found at: <https://historicengland.org.uk/advice/find/a-z-publications/>

Policy

The Local Plan identifies that: *“The historic environment of Staffordshire Moorlands is a resource for which the District is renowned”* (para. 7.83), and confirms that *“Protection will be given to designated heritage assets and their settings and non-designated heritage assets as set out in the NPPF”* (Policy DC 2).

The Local Plan further states:

“The Council would expect to see an assessment of how the application/proposal will affect the significance of a heritage asset, including its setting and what mitigation/enhancement measures may be needed to overcome any potential harm. This may require detailed supporting documents such as historic phasing plans, photographic survey, structural survey, detailed analysis of views and setting or archaeological field evaluation. To assess impact, detailed drawings will be required and photomontages can be particularly useful” (para. 7.92).

This is mirrored by the NPPF, which requires that: *“The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance”* (NPPF 2024, para. 207).

It is clear from the planning submission that the proposed alterations have not been sufficiently evidenced, nor has any meaningful or proportionate assessment of the building's significance been undertaken. The scheme's viability and public benefit have likewise not been demonstrated.

Conclusion

For the reasons set out above, we advise that, at a minimum, the design and detailing of the proposed scheme be made subject to planning conditions, so that further clarity might be provided as to the extent of the works, the proposed materials and any potential loss of historic fabric.

We would be grateful if you could inform the Victorian Society of your decision in due course.

Yours sincerely,

Thomas Ollivier
Northern Conservation Adviser