



**CONSULTATION RESPONSE: OBJECT**

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Our reference: 23020

20th March 2023

Dear Ms Yates,

**Planning Application 68761/FUL | Demolition of former pub and adjacent building | 27 and 29 Snow Hill, Shelton, Stoke-on-Trent, ST1 4LU**

SAVE Britain's Heritage strongly objects to the above planning application for the demolition of the former public house, The Bell & Bear on the basis that the proposal involves the total loss of non-designated heritage asset (NDHA), which we consider to be unjustified in heritage and environmental terms. As it stands, we consider this application fails to provide adequate justification for this harm and therefore fails to comply with national and local policy for preserving Stoke's historic environment and mitigating climate change. We therefore call on the Local Planning Authority to refuse planning permission.

**Significance**

The current building dates to the 1890s, and was built in the Tudor-revival style, as a replacement for an earlier inn on the site. The pub served the residents and workers of the Potteries and was constructed of red and brown brick with applied half-timbering. There are elements of decorative ridge tiles and an elaborate geometric framing to the first floor, which incorporates pargetting and bargeboards with medieval motifs. The central doorway is surmounted by a Diocletian window and flanked by mullion and transomed windows, with diamond leaded lights. The building is representative of a class of public buildings of the eighteenth century that retains aspects of historic design and construction, using local materials, and represents an important layer of Stoke's history.

**Our Assessment**

SAVE objects to this proposal for the following three reasons:

**A) Substantial harm to a non-designated heritage asset**

Firstly, we consider the proposal to demolish this local landmark and NDHA to be unjustified in heritage terms and fails to satisfy local and national policy. In weighing applications that directly affect NDHAs, Paragraph 203 of the National Planning Policy Framework (July 2021) states that "*a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*". The scale of harm to be

weighed in this case is substantial, involving the total loss of an NDHA with clear significance. Given that the existing building has not been proven to be structurally unsound and taking account its clear historic and cultural significance to this part of Stoke, we do not consider the substantial scale of harm caused through its total loss can be justified.

The justification offered for the demolition of this building is that it has deteriorated to such a degree that it is no longer economically viable to repair it. However, paragraph 196 of the NPPF makes it clear that “*where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.*” In this case, the evidence suggests clear neglect of the building, where no work has been carried out thus allowing it to deteriorate further. SAVE therefore considers the current condition of the building should not be a material factor in determining this planning application.

### **B) Unsustainable development in environmental terms**

Secondly, the demolition proposed is not sustainable development in environmental terms. One of the three overarching objectives of the NPPF (2021) is the environmental objective: “*to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.*” The demolition of the Bell & Bear pub would have an unnecessary negative carbon cost, contradicting paragraph 152 of the NPPF which sets out a core principle of the planning system is to “*support the transition to a low carbon future in a changing climate [...] [and] encourage the reuse of existing resources, including the conversion of existing buildings*” (own emphasis added). Retaining and retrofitting historic buildings like these, and the considerable amount of embodied carbon they contain, is of paramount importance if Stoke-on-Trent Council is to comply with these important national policy requirements.

### **C) Capacity for retention**

We also consider the building to be capable and worthy of being retained, restored and sympathetically extended as part of any future redevelopment of this site. Such a proposal was purportedly tabled by the City Council in 2008, following the pub’s closure. In retaining and reusing this characterful and historic building, a key part of Stoke’s architectural heritage would be preserved for future generations and the challenges of climate change met in a positive manner.

Furthermore, approving demolition without sufficient justification or evidence as to how and why retention of any kind is not possible, risks setting a dangerous precedent for the piecemeal demolition of other NDHAs in Stoke.

### **Conclusion**

For the reasons outlined above we consider demolition and the harm it would cause to be unjustified in planning terms, and on this basis, we call on the Local Planning Authority to **refuse** planning permission.

I trust that these comments are useful to you, and I ask that you keep me informed of further decisions or consultations regarding this application.

Yours sincerely,



**Fraser White**  
SAVE Britain’s Heritage