



Historic England

Mr James Stannard
High Peak Borough Council
Municipal Buildings
Market Place
Glossop
SK13 8AF

Direct Dial: [REDACTED]

07 May 2026

Dear Mr James Stannard

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LISTED BUILDING CONSENT TO ALTER AND EXTEND THE HYGIENE ROOM
SYSTEM OF THE GRADE II LISTED NATURAL BATHS (ST ANN'S WELL), THE
CRESCENT, BUXTON, DERBYSHIRE, SK17 6BQ
Application no: HPK/2026/0134**

Thank you for your consultation regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Significance

The Grade II listed Natural Mineral Baths are principally significant as a fine Victorian former bath house built on a site of great time depth once home ancient Roman baths and later Georgian baths. Designed by Henry Currey in 1851-53, the hydropathic facilities were altered in the 1920s to facilitate use as the gentleman's first-class bath. At this time, a floor to ceiling decorative tiled wall, segmental stained-glass windows and a terrazzo floor was installed, all of which contributes highly to



Historic England, The Foundry, 82 Granville Street, Birmingham, B1 2LH
Telephone 0121 625 6888 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

the interior's architectural value. Historic photographs of the interior are helpfully provided in the heritage statement which illustrate its use as first class gentleman's baths.

Cubicles are mentioned in the list description from 1951; however, these are no longer *in situ*.

As an important building in Buxton's history as a spa town, the Natural Baths have group value with the Grade I listed Crescent complex (which it adjoins and was once part of) and The Slopes pleasure garden laid out in by Jeffry Wyatville in 1818, a Grade II listed Registered Park and Garden. The building is also located within the Buxton Central Conservation Area and contributes positively to its character and appearance.

Impact

The proposal is to extend the existing hygiene enclose system (which was approved in 2018) to the majority of other spaces within the building including completely around the former pool enclosure as well as the remaining rooms and entrance lobby (one small room will be exempt as an electricals store). There are also below ground engineering works proposed to install new balancing pipework into three new covered trenches to enable better control of water. A new 6mm polyurethane floor would be installed throughout.

The proposals to cover the existing historic tiled interior with a hygiene system would be harmful to the architectural significant of the interiors. Whilst the interiors house modern processing equipment the floor to ceiling decorative tiles and stained glass are of high quality and largely complete.

The covering of the interiors would also harm historic value as the interior are illustrative of the classical style consistent across Buxton's Crecent complex and the spa and well buildings across town.

The excavation of trenches may harm evidential value as the substructure of the building is currently not fully understood.

Policy

Section 16 of the National Planning Policy Framework (NPPF), Conserving and Enhancing the Historic Environment, sets out policies for decisions governing change in the historic environment.

Paragraph 207 of the framework sets out the expectation for supporting information, noting that "local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."



Historic England, The Foundry, 82 Granville Street, Birmingham, B1 2LH
Telephone 0121 625 6888 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

Paragraph 208 states that local planning authorities “should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”

Paragraph 213 sets out that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

Paragraph 215 requires that less than substantial harm to significance should be weighed against the public (including heritage) benefits of a proposal.

Position

Historic England has identified harm to the significance of the Natural Baths through the concealment of its decorative interiors from the 1920s phase, which contribute highly to its significance. We think the trenches proposed for pipe work have the potential to cause harm as the significance of the substructure of the building is not currently understood.

We are awaiting further information to help the application meet the requirements of paragraph 207 of the NPPF. This includes a complete archaeological WSI to fully understand the substructure of the floor and to detail the impact of the three proposed trenches. It is not known whether the footprint and form of the 1920 gentleman’s pool survives beneath the 1970s floor or below ground remains which relate to the Georgian building or an even earlier phase of the building. Whilst intrusive investigatory works were discussed on site, these would need to be informed by the WSI and the scope agreed with the local authority and archaeological advisor to ensure the substructure isn’t harmed during the investigations. The results of these investigations should inform the design of the trenches.

From our site meeting, we understand the hygiene requirements of the water handling system in order for the building to maintain this use. We have requested that a stronger justification for the proposals which set out how the proposals are necessary and required to maintain the use of the building as a the Nestle facility, a requirement of paragraph 213 of the NPPF. It was also noted on site that the hygiene panels would protect the interior against cleaning chemicals, and it would be useful to have further details of this. Whilst the current use is not the optimum viable use for the building, which was a former pool, we accept it is a use consistent with the history of the building and town around the consumption of mineral water.



Historic England, The Foundry, 82 Granville Street, Birmingham, B1 2LH
Telephone 0121 625 6888 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.

We think a section drawing should be submitted to show how the hygiene panels would be self-supporting against the tiled interior to help manage potential harm in line with paragraph 208 of the NPPF.

The local planning authority will also need to weigh the harm, which we assess to be at the lower end of less than substantial, against the public benefits of this proposal, as described in paragraph 215 of the NPPF. We cannot comment on public benefits but can comment on heritage benefits. We are not convinced the current schemes offers heritage benefits, however, it was discussed on site that a new, clear running window strip would be built into the panels in order to show the tiled cornice and wreath details across the site including where the exiting hygiene panels are situated from the 2017 approval (a small windows exists in 2017 scheme but does misses the feature it was designed to display and the whole of the stained glass windows). If built into the design through amendments to this application, we think this would offer a heritage benefit applicable to the weighing exercise.

We are also awaiting amended plans to show the proposed electrical cupboard as an interior which will not be clad in hygiene panels. It would be positive to retain the terrazzo floor which solely survives in this location, *in situ* to reduce harm.

Recommendation

Historic England is supportive of the principles of this application which will allow the building to maintain its current use but requests amendments are made to reduce harm to the significance of the building (paragraph 208) through a continuous window designed in the hygiene panels, a stronger statement of justification setting out how the works are necessary, and further information (paragraph 207) to support the application in terms of plans and a WSI.

In determining this application, you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account when making a decision on the application. If there are any material changes to the proposals, or you would like further advice, please contact us

Yours sincerely,
Jessica Jenkinson

Inspector of Historic Buildings and Areas (Nottinghamshire and Derbyshire)



Historic England, The Foundry, 82 Granville Street, Birmingham, B1 2LH
Telephone 0121 625 6888 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.