The Victorian Society

Mr William Simcock
Planning Department
Kirklees Council
Via email

DC.Admin@kirklees.gov.uk

21 April 2026

Dear Mr Simcock

RE: 2025/65/92140/E (JCNAS 216894) | The Old Dewsbury Library, Wellington Road, Dewsbury, WF13 1HN (Grade II, *G. E. T. Lawrence,* 1896, alterations in 1931 and mid C20th). Application for conversion of library into 14 one- and two-bedroom apartments. Associated repairs, alterations and landscaping, erection of external bike storage.

Thank you for consulting the Victorian Society on this case; having reviewed the application carefully, we **raise serious concerns** to these proposals in their current form. We took this application to our Buildings Committee, who discussed the proposals at length during their April Meeting.

Old Dewsbury Library is a Grade II-listed building, meaning that it is recognised for its national significance and special interest. The building is a good example of a loose Jacobethan style, which was becoming increasingly popular towards the end of the C19th, particularly for public buildings. The library was altered in the 1930s, when a large children's mural designed by *Henry Wood* was installed within the building; this mural has become a defining feature of this building.

The Old Dewsbury Library neighbours the old Public Baths, which shares the same architectural language and materiality as the Public Library. Given their relationship and historic context, the Society would consider the baths to be curtilage to the listed library.

This application seeks permission to convert the library into 14 one- and two-bedroom apartments, involving internal and external alterations. The library is currently in a state of serious disrepair, but still retains its national significance and special interest. As a Society, we accept the careful and considered alteration of listed buildings when it results in sustainable and sympathetic reuse; however, we raise concerns with these proposals in their current form.

The Victorian Society
1 Priory Gardens, London W4 1TT | 020 8994 1019 | Charity No. 1081435 | Company Limited by Guarantee No. 3940996
admin@victoriansociety.org.uk | www.victoriansociety.org.uk

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The Heritage Impact Assessment
We note that apartments are amongst the most challenging conversions when it comes to preserving historic internal features. While we welcome the principle of the proposal, we request more information is supplied on how internal features are to be preserved and how the national significance of the building will be affected. While a short heritage statement has been included as part of this application, it is not of the level which we would expect for a Grade II-listed building and it does not adequately assess the impact of the proposals. Any alteration to this building must be accompanied by the '*clear and convincing justification*' that is central to the National Planning Policy Framework (2024, paras. 212-215).

Before this application can be fully considered, we recommend that further information is submitted to ensure that all harm has been identified and mitigated, and that the proposal is demonstrated to be the most sympathetic is possibly can be. If there is not already a heritage consultant on the project, we would strongly recommend the involvement of one, to ensure that specialist advice is sought for this sensitive building.

Lack of Detail
As a Society, we recommend that more information is provided regarding how the cupola and lantern is to be replaced, how the decorative ceiling is to be boxed-in, and how the 1931 mural is to be '*maintained in a communal area for all to view*'. As it stands, there is a severe lack of detail in these proposals, and we are concerned that unjustified harm may take place in this conversion. More detail as to the nature of the changes, and more detailed plans, should be supplied before this application can be considered by your Authority.

Potential Overdevelopment
During the meeting of our Buildings Committee, it was discussed that 14 flats in such a small building could border on overdevelopment. A smaller number of flats would be less intrusive and allow for the historic planform to be retained to a greater extent. This would likely also remove the need to box-out the decorative ceiling that is specifically highlighted in the list description. As it stands, covering this feature will not enhance the buildings national significance or allow its character to be read.

However, we do recognise that a level of economic incentive must be present for the continued use of this building; at present, the need for 14 flats has not yet been fully justified.

Conclusion
The Victorian Society is concerned that this application has not been accompanied by an adequate level of detail or impact assessment and therefore does not fulfil the NPPF. Further

detail and plans should be provided to ensure that all potential harm is identified and mitigated, and that all proposals can be fully understood by your Authority and the National Amenity Societies. We would also recommend the involvement of an accredited Heritage Consultant on the project, to ensure that the national significance of the building is understood and championed.

We hope these comments are understood in the constructive and helpful manner in which they are given. If you could keep the Victorian Society updated on your decision in due course, I would be very grateful.

Yours Sincerely

Thomas Ollivier
Northern and Welsh Conservation Adviser