

Heritage Impact Assessment: Amended proposals for
conversion to apartments at

Holland House, 17 High Street, Spalding



for

D&R Property Services Limited

GLA-118

February 2015

Contents

	Page
1.0 Introduction	2
2.0 Site and proposals	3
3.0 Heritage assets and their significance	5
4.0 Heritage policies, duties, and guidance	12
5.0 Heritage impact	18
6.0 Conclusions	20
Sources	21

1.0 Introduction

- 1.1 This document constitutes a Heritage Impact Assessment of proposals to convert the grade II listed Holland House, 17 High Street, Spalding, PE11 1TW to six apartments rather than five as previously approved.
- 1.2 The Heritage Impact Assessment has been researched and prepared on behalf of D&R Property Services Limited by Roy M Lewis BA (Hons), MA (Arch Cons), MRTPI, IHBC and reviewed by Philip Grover BA (Hons), BTP, Dip Arch. Cons., MRTPI, IHBC, of Grover Lewis Associates Limited.
- 1.3 The amended scheme has been designed by Cooper Architectural Design of Spalding.
- 1.4 This Heritage Impact Assessment should be read in conjunction with the Historic Building Assessment of Holland House prepared by Grover Lewis Associates Ltd. (ref. GLA-118, April 2013), which establishes the heritage significance of Holland House as a heritage asset.
- 1.5 The Heritage Impact Assessment describes and sets out the national and local heritage policies, statutory duties, and guidance material, against which the revised proposals should be judged. Against this background, the conclusions assess the impact of the proposal on the significance of the heritage assets affected and the statutory duties relating to listed buildings and conservation areas, together with national and local planning policies relating to heritage considerations.
- 1.6 The assessment aims to satisfy the requirements of paragraphs 128 and 129 of the National Planning Policy Framework (NPPF), which require that applicants for planning permission should describe the significance of any heritage assets affected by development proposals, including any contribution made by their setting, and that local planning authorities should take account of available evidence and any necessary expertise when considering the impact of a proposal on heritage assets.

2.0 Site and proposals

The site

- 2.1 The site is located on the south-east bank of the River Welland, approximately 200 metres to the north east of High Bridge, which is the principal river crossing in the centre of Spalding. The site fronts High Street, which runs alongside the river, and occupies the corner plot at its junction with Holland Road. The plot is a compact, approximately rectangular parcel of land with a frontage width of approximately 37 metres and a depth of around 78 metres. It narrows as it runs back from High Street.
- 2.2 Until recently, the site contained two main structures: the two and a half storey red brick Holland House that occupies a little under half of the north-western frontage to High Street and a three-storey, former Government Offices building set back from High Street with its principal facade addressing Holland Road to the north-east. The latter office building has recently been demolished to make way for new residential development authorised by planning permission ref. H16-0040-14 granted on the 7 October 2014.
- 2.3 The site and the immediate surroundings, photographed prior to the demolition of the former Government Offices building, is indicated on Plate 1 below.

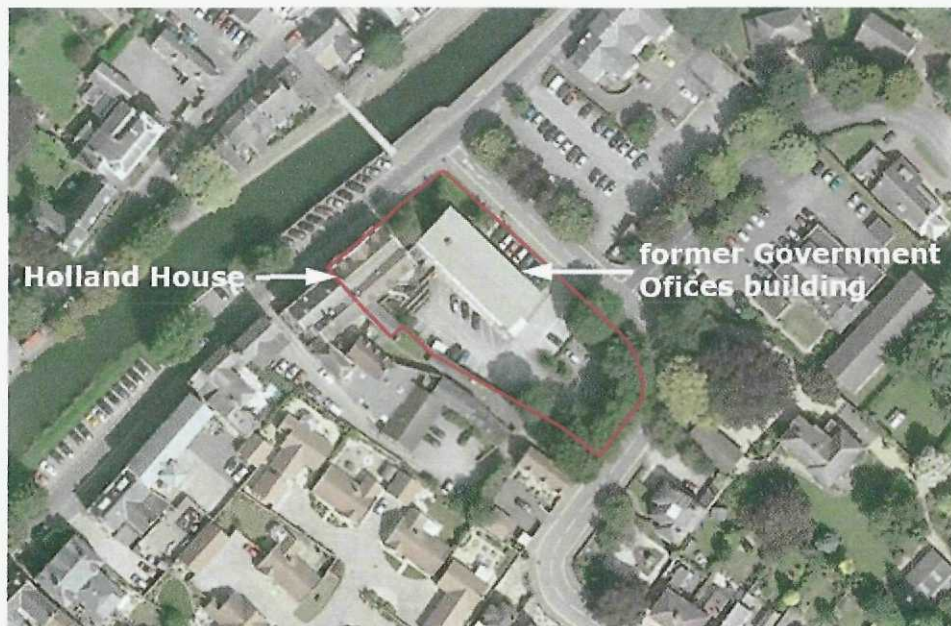


Plate 1: Aerial photograph of the site and its surroundings taken prior to the demolition of the Government Offices building (source: Google Earth)

The proposals

- 2.4 Planning permission ref. H16-0040-14 granted 7 October 2014 and listed building consent ref. H16-0041-14 granted on the 11 June 2014 authorised the conversion of Holland House to form five apartments. The approved works have been commenced.
- 2.5 The current proposal is to convert Holland House to six apartments rather than five, as approved. This will be achieved by conversion of the second floor to two one-bedroom apartments, rather than a single two-bedroom apartment. The proposals are indicated in full in plans prepared by Cooper Architectural Design.
- 2.6 It is proposed to provide an opposing entrance door to each apartment in the existing corridor at the head of the staircase. One of the doorframes will be a surplus frame and architrave from the conversion works on the floor below that will be re-used. Unit 5 will occupy three existing rooms on the south-western side of the building, while unit 5A will occupy two existing rooms on the north-east side plus the existing open landing area.
- 2.7 The central front room will be subdivided to form a kitchen and shower/toilet compartment for unit 5 (see Plate 3). The existing doorway into the room, which has a modern door will be blocked to enable the kitchen and shower/toilet compartment to be positioned alongside the corridor wall.
- 2.8 The existing open landing area will provide the kitchen for unit 5A (see Plate 5). The north-eastern front room will be used as the bedroom for Unit 5A, subdivided to form a shower/toilet compartment and a store along one side (see Plate 4).
- 2.9 No change is proposed to the approved scheme with regard to the ground and first floor levels of the building, which provides two single bedroom units on the ground floor, and one single bedroom and one two-bedroom unit on the first floor. Nor is there any change to the approved arrangements for external access which is provided via the existing front and rear doors. The approved scheme includes reconstruction of a secondary staircase that was built as part of restoration works following a major fire in 1993. Access to the second floor will be via the reconstructed secondary staircase, as approved.
- 2.10 No change is proposed to the external arrangements, other than the provision of refuse facilities for the additional apartment.

3.0. Heritage assets and their significance

Holland House

- 3.1 Holland House is a grade II listed building, described as a house of circa 1768, probably by William Sands, Junior, that was altered circa 1845 (list entry number 1063982). Holland House has the current postal address of No.17 High Street. The attached wing to the south-west occupied by Brown and Co. (Estate Agents) constitutes part of the listed building but has the separate postal address of No.16 High Street.
- 3.2 A separate historic building assessment prepared for Holland House by Grover Lewis Associates Ltd. dated April 2013 should be read in conjunction with this report. The historic building assessment sets out the known origins and evolution of the building, analyses the standing building in detail, and establishes its significance as a heritage asset. The assessment concludes that Holland House is highly significant in architectural and artistic terms as a very high quality example of a Georgian townhouse. Pevsner, et al (1989) describe Holland House as *the best architecturally in the town*. Holland House is significant historically as a merchant's house, built in the period when use of the river as a port following drainage of the Fens, brought great prosperity to Spalding. The occupants of the house have included some of Spalding's most notable civic dignitaries and benefactors, including Thomas Pulvercroft, Theophilus Fairfax Johnson, Theophilus Maurice Stephen Johnson, Edward William Gooch, and Herbert George Frost.
- 3.3 Internally, the building's Georgian plan form is relatively unaltered and a fine cantilevered staircase forms a principal feature. A number of original features survive, including fireplaces, doors, panelling and a small number of windows. The building was restored following a major fire in 1993 and a modern replacement laminated truss roof structure has been introduced. This has caused some reduction in the building's significance in architectural terms, particularly at second floor level where the modern replacement roof structure is visible and modern replica joinery has been installed throughout.
- 3.4 The second (attic) floor layout which is affected by the current proposal, is comprised of six main spaces which was the historic plan form. However, doors, skirtings, windows, ceilings, the roof structure, and parts of the internal walls are modern fabric.
- 3.5 Interior spaces are plain, with no architectural enrichment, which may well mirror the original arrangement (see Plates 3, 4, 5, and 7). The partly exposed

modern laminated roof trusses are particularly noticeable (see Plates 4, 6 and 7). The laminated trusses are installed over the whole double-roof, with the exception of the central bay of the front-range, which is a modern softwood roof structure. All doors at second floor level, which are half-glazed, are modern (see Plate 7). The reconstruction work at second floor level includes faux sash windows that are outward opening (see Plate 8). A small original fireplace with cast iron insert, survives in each of the two rooms at the north-east end (see Plate 4).

- 3.6 Consequently, the interior architectural character of the second floor level is both plain and modern. Traditional characteristics are limited to the original window openings (see Plate 3), canted ceilings identifying the rooms as being within the roof space, and the two small original fireplaces.
- 3.7 The once fine setting of Holland House provided by formal grounds that extended eastwards, has been severely degraded. Prior to the commencement of the re-development authorised by planning permission H16-0040-14, the building had an extremely poor setting on its eastern and north-eastern sides, due to the presence of the inappropriate Government Offices building, a cumbersome disabled access ramp at the rear of the building, and hard-surfaced car-parking areas, which seriously detracted from the architectural and artistic significance of the listed building. The approved redevelopment scheme will enhance the setting of the listed building.



Plate 2: Holland House, principal façade fronting the River Welland



Plate 3: Holland House – central front second floor room



Plate 4: Holland House – front second floor room on the north-eastern side of the building



Plate 5: Holland House – landing space, second floor level



Plate 6: Holland House – modern replacement laminated truss roof structure



Plate 7: Holland House – typical modern half-glazed door at second floor level

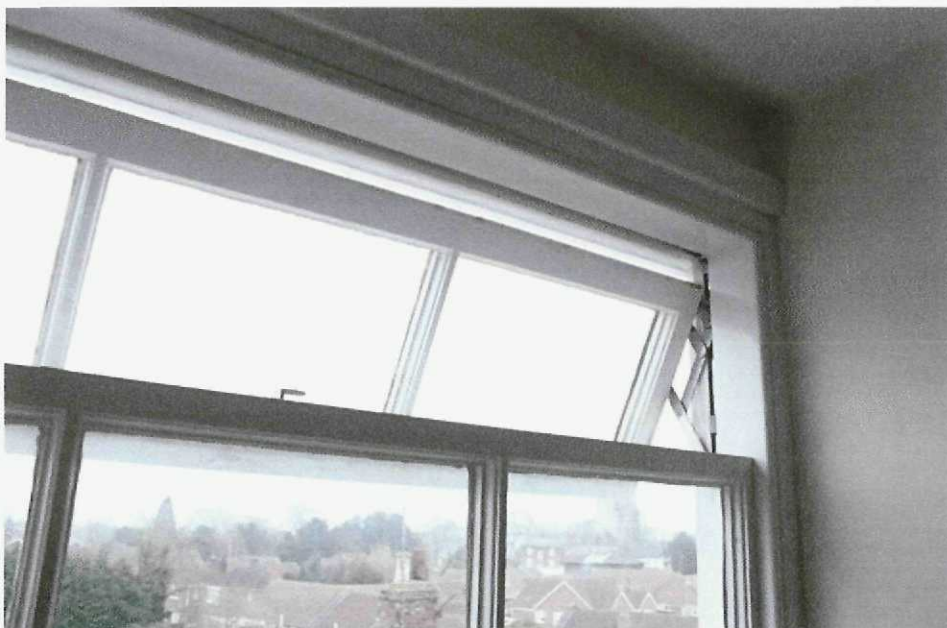


Plate 8: Holland House – typical modern replacement window with outward opening top light

Listed buildings in the vicinity

- 3.8 Further south along the High Street frontage is a group of listed buildings that include No.15 High Street (grade II), Selby House, No.14 High Street (grade II), the Warehouse occupied by GW Plowman & Son, High Street (grade II) and No.12 High Street (grade II). On the opposite side of the River Welland stand The Limes, No.12 Double Street (grade II*), The Sycamores, No.13 Double Street (grade II*), No.13A Double Street (grade II), which is the former stable block to No.13 Double Street, Cromwell House, No.65 Double Street (grade II), No.63 Double Street (grade II), and No.59 Double Street (grade II).
- 3.9 There are additional listed buildings on the south-east bank of the river further along High Street, to the north west, including the Star Relay Warehouse (grade II), Yew Lodge, No.21 High Street (grade II*), the garden wall to No.21 High Street (grade II*), and Cley Hall, No.22 High Street (grade II*).
- 3.10 The group formed by Holland House and the other historic buildings that line the River Welland adds to its heritage significance. The list entry for Holland House notes that Nos. 12, 14, 15, the Warehouse occupied by GW Plowman & Son and Holland House form a group.

Spalding Conservation Area

- 3.11 Spalding Conservation Area was designated in 1970. The boundary was extended in 1975. The conservation area has an extensive coverage that embraces the whole of the historic town centre and the riverside. The character and appearance of the conservation area is described and illustrated in some detail in the *Spalding Conservation Area Appraisal*, which was prepared by South Holland District Council in 2007.
- 3.12 Holland House is located within the north-eastern part of the conservation area, within a narrow band that incorporates buildings that line the banks of the River Welland. The historic urban form of this part of Spalding provides a relatively rare example of a town with many of its most important buildings addressing the river, a quality noted in the District Council's *Spalding Conservation Area Appraisal*. Holland House is one of the most significant of these buildings and therefore makes an extremely important contribution to the character and appearance of the Spalding Conservation Area.
- 3.13 Notwithstanding the overall very high townscape quality of the riverside in this part of the conservation area, the streetscene to the immediate north-east of Holland House has been seriously debased. Buildings to the north of Holland

house, including the former Elmsford House, have been demolished to create a large surface car-park which causes an inappropriate gap in the enclosure of the street.

- 3.14 The conservation area boundary embraces part of the original garden area to Holland House, as delineated by Holland Road which was constructed through the wider grounds around 1910. The former garden area was until recently dominated by the presence of the over-large and inappropriate Government Offices building, which had been built to the immediate east of Holland House in 1960. The development, which had been facilitated by the acquisition of Holland House by Spalding Urban District Council in 1941, required the demolition of the carriage entrance to Holland House and the adjoining coach-house fronting High Street. The character and appearance of this part of the Spalding Conservation Area is currently being enhanced by the implementation of the approved redevelopment scheme.

4.0 Heritage policies, duties, and guidance

Overview

- 4.1 The proposed development must be considered in the light of both statutory duties and heritage planning policies. Statutory duties relating to proposals affecting listed buildings and conservation areas are contained in the Planning (Listed Buildings and Conservation Areas) Act 1990. The heritage policy context in which the proposals must be assessed includes both national and local policies.
- 4.2 National heritage policies are set out in the National Planning Policy Framework (NPPF). The local heritage policy context is provided by the relevant policies of the South Holland Local Plan.

Statutory duties

- 4.3 Determination of the application for listed building consent must take account of the statutory duty in section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires that, in considering whether to grant listed building consent for any works, the local planning authority or the Secretary of State shall have *special regard to the desirability of preserving a listed building or its setting, or any features of special architectural or historic interest that it possesses*.
- 4.4 Similarly, section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 makes it a statutory duty for a local planning authority, in considering whether to grant planning permission for development which affects a listed building or its setting, to *have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*.
- 4.5 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that, in the exercise of planning functions, *with respect to any buildings or other land in a conservation area ... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*.
- 4.6 The House of Lords clarified in the South Lakeland case in 1992 that the *statutorily desirable object of preserving the character or appearance of an area is achieved either by a positive contribution to preservation or by*

development which leaves character or appearance unharmed, that is to say, preserved. In effect, this means that neutral development proposals satisfy the statutory duty.

- 4.7 The more recent Barnwell Manor and Forge Fields court judgements have established that *considerable importance and weight* must be given to the sections 16, 66 and 72 duties. The judgments are made on the basis that the word *desirability* in sections 16, 66 and 72 signals a desired or sought-after objective, to which the decision-maker must accord *special regard* and that *'preserving' means doing no harm*.

National Planning Policy Framework and related guidance

- 4.8 The National Planning Policy Framework (NPPF) published on 27 March 2012, replaced all of the Government's previous Planning Policy Statements. Section 12 (paragraphs 126-141) of the Framework sets out policies relating to the conservation of the historic environment.
- 4.9 The policies in section 12 of the Framework refer to the concept of a *heritage asset*, which is defined as *a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing) (Annex 2: Glossary).*
- 4.10 The policies in section 12 of the Framework place an emphasis on *significance*, which is defined as *the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting (Annex 2: Glossary).*
- 4.11 A number of the policies set out in the Framework are of direct relevance to the consideration of the current development at Holland House, Spalding. Paragraph 126 states that *local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.*

4.12 The Framework reinforces this approach in paragraph 131, which states that, *in determining planning applications, local planning authorities should take account of:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.*

4.13 NPPF Paragraph 132 states that in considering the impact of a proposed development on the significance of a designated heritage asset, *great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.* Paragraph 132 clarifies that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. It goes on to state that *substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, should be wholly exceptional.*

4.14 Paragraph 134 states that in cases where there is less than substantial harm to the significance of a designated heritage asset, *this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.*

4.15 The publication of PPS5 in March 2010 was accompanied by the joint Government/English Heritage publication *Historic Environment Planning Practice Guide*. Notwithstanding the replacement of PPS5 by the policies in the NPPF, the companion guide to PPS5 remains extant. The Practice Guide provides guidance on the process of assessing the implications of change affecting setting, the starting point of which is understanding the significance

of the heritage asset affected and the contribution made by its setting (paragraph 119).

- 4.16 Paragraph 34 of the Practice Guide states, *the Government's strategy for improving quality of place, World Class Places, CLG (2009), recognises the essential role of the historic environment in providing character and a sense of identity to an area. Heritage assets can inform and inspire place-making. Recognising how the design, materials and pattern of land use of the built environment provide character and definition to a locality can enable local planning authorities to better understand the appropriateness of proposed development.*
- 4.17 A key point made in the Practice Guide is that *a proper assessment of the impact on setting will take into account, and be proportionate to, the significance of the asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it* (paragraph 122).
- 4.18 The Practice Guide makes the point that *the historic significance of an asset can be sustained or enhanced if new buildings are carefully designed to respect their setting by virtue of their scale, proportion, height, massing, alignment and use of materials* (para 121).
- 4.19 Further interpretation of the policies in the NPPF is provided by the on-line National Planning Practice Guidance (NPPG).

Local heritage policy context

- 4.20 The local heritage policy context is contained in the South Holland Local Plan (adopted July 2006).
- 4.21 Local Plan Policy EN4: Development Affecting Listed Buildings states:
The District Council will protect listed buildings in order that the historic fabric of the area is retained. Planning permission for development affecting a listed building or its setting will only be granted where the proposal preserves or enhances the character and appearance of the building and its setting. The following criteria will be applied in determining proposals:
- 1. The development should respect the character of the listed building in terms of size, form, positioning, scale, design, roofscape, materials, colour, fenestration, detailing and its setting in terms of materials, landscaping and street furniture.*

2. *The development should ensure that important views and closures, including through views, and ancient street patterns are restored or maintained.*
3. *The development should preserve features of special architectural or historic interest which the building may possess.*
4. *The development should preserve or enhance the historic form and structural integrity of the building.*

4.22 Local Plan Policy EN5: Alteration, Extension And Change of Use of Listed Buildings states:

Planning permission and/or listed building consent for the alteration, extension or change of use of a listed building will be granted where all of the following criteria are satisfied:

1. *That the proposed alterations, internally or externally, would not be detrimental to the special character or long term stability of the building.*
2. *That the proposed alterations and / or extensions would be sympathetic in scale, form, construction, colour, design, materials and location with the existing building.*
3. *That the original building has not been extended to such a degree that further extension works would harm the visual, historic or architectural merit of the building and the area in which it is located or its setting.*
4. *That the proposed development does not involve the subdivision of the garden or grounds of the listed building which would threaten the future viability of, or in any way detract from, its setting.*
5. *That the proposed change of use or sub-division of the listed building does not damage the fabric or special character of the building or its setting.*

4.23 Local Plan Policy EN7: Development Affecting Conservation Areas states:

The District Council will protect the designated conservation areas in order that the historic fabric of the area is retained. Planning permission for development within or affecting the setting of a conservation area will only be granted where the proposal preserves or enhances the character and appearance of the area and its setting. Particular attention should be given to the following criteria in determining proposals:

1. *The size, form, positioning, scale, roofscape, detailing and design of proposals are sympathetic to the character of the area and compatible with adjacent buildings.*

2. *Materials of construction should be appropriate to the area and sympathetic to adjacent buildings in terms of colour, texture, type and size.*
3. *The siting of the proposal respects important views and closures, including through views, ancient street patterns and important spaces and preserves and protects existing trees and landscape which contribute to the character or appearance of the conservation area.*
4. *The proposal should retain important architectural and historic features such as street furniture, street name plates and paving.*

4.24 South Holland District Council, Boston Borough Council and Lincolnshire County Council, are jointly preparing a South-East Lincolnshire Local Plan that, in due course, will replace the South Holland Local Plan. This is currently at an early stage of preparation. A first draft of the plan is yet to be published.

5.0 Heritage impact

- 5.1 This assessment of heritage impact considers the effect that the current proposal would have on the significance of Holland House as a listed building and also as a component of the Spalding Conservation Area. The significance of these heritage assets is set out in the accompanying Historic Building Assessment and summarised in Section 3.0 of this document.
- 5.2 As planning permission and listed building consent have already been given for a conversion scheme that converts the second floor of Holland House into a two-bedroom apartment, this assessment of the impact of the proposed conversion of the second floor to two one-bedroomed apartments is made against the building in its unconverted condition and additionally compares the proposal with the scheme that the local planning authority has determined to be acceptable.
- 5.3 The approved scheme would have created a spacious apartment, with large rooms. Consequently, the conversion of the second floor to form two small apartments can be achieved with relatively little additional adaptation.
- 5.4 The design of the approved conversion of Holland House responds to the historic plan form of the original building and this will not be altered. In common with the approved scheme, the revised proposals for the second floor retain the internal masonry walls that demarcate the six existing spaces. It will however be necessary to install shower/toilet compartments in two rooms. The approved scheme concentrated such facilities in one space.
- 5.5 Use of the existing central front room to form a kitchen and shower/toilet facility for unit 5 will ensure that the three existing window openings can be appreciated both internally and externally, with no alteration. There will be a minor change to the size of the room but attic rooms are not normally valued for their spatial qualities. The proposals require the re-positioning of the existing door opening to this room from the corridor. It is not known whether the door position is original due to the extent of rebuilding following the fire damage but in any event, door positions in attic spaces are not generally significant in relation to the architectural interest of the house as a whole. The existing door to be removed is modern and the approved scheme showed a wider double-door in the same position as the proposed door. Consequently, it is not considered that the proposed works to the central front room will cause any material harm to the significance of the listed building.

- 5.6 Subdivision of part of the existing front room on the north east side to form a shower/toilet facility for unit 5A in a room that was intended as a second bedroom in the approved scheme will make a minor change to the size of the room. Again, the spatial qualities of the attic spaces are not considered to be significant. The arrangement will allow the surviving fireplace to be retained.
- 5.7 Use of the existing open landing area as the Unit 5A kitchen will require considerably less alteration than the use of this space to provide both a bathroom and an en-suite facility in the approved scheme.
- 5.8 Use of the existing rear room to the south-west as a bedroom will require no material change and will represent less change than the approved scheme which proposed use of this room as a kitchen. The revised proposals require no other material changes.
- 5.9 In summary, the revised proposal will cause more change in two rooms and less change in two others. None of the change proposed will cause any harm to the significance of the listed building at second floor level, due to the modern character of this part of the property. It will however be important to ensure that pipe runs through the lower parts of the building are sensitively sited.
- 5.10 Externally, there will be no change to the appearance of the building other than one additional discretely sited boiler vent.
- 5.11 The primary effect of the current proposal will be to secure an appropriate use of the whole building, thereby providing a sustainable use for the heritage asset and maximising the likelihood of its long-term survival. The proposed conversion to two one-bedroom apartments will make better use of the second floor space in economic terms without prejudicing heritage significance and thus constitutes the optimum viable use of the listed building.
- 5.12 The primary effect on the Spalding Conservation Area will be that the proposal will secure an appropriate use of Holland House and will thus secure the retention of a key component of the character and appearance of the conservation area.
- 5.13 The revised proposal will have no visual impact on the settings of other listed buildings in the vicinity.

6.0 Conclusions

- 6.1 This Heritage Impact assessment considers the effects of the proposed conversion of the second floor of the grade II listed Holland House to two one-bedroom apartments, rather than a single two-bedroom apartment, and the wider impact on the Spalding Conservation Area. The proposal will result in the listed building being used to accommodate six apartments rather than five, as approved.
- 6.2 The assessment concludes that, subject to sensitive siting of pipework to kitchens and bathrooms, the proposed conversion of Holland House to six rather than five apartments will cause no harm to the significance of Holland House as a listed building or to the Spalding Conservation Area.
- 6.3 Consequently, the revised proposals will preserve the listed building, its features and its setting and will satisfy the requirements of sections 16(2) and 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.4 Similarly, the revised proposals will preserve the character and appearance of the conservation area and will satisfy the requirement of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 6.5 The revised proposals are fully in line with the heritage policies of the National Planning Policy Framework (NPPF). In particular, the proposals accord with the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation and the objective of securing an optimum viable use for the building.
- 6.6 The revised proposals will preserve the listed building, together with its historic form and structural integrity and are therefore in conformity with the provisions of the South Holland Local Plan Local Plan Policy EN4 (Development Affecting Listed Buildings). The proposals satisfy all the specific requirements of Local Plan Policy EN5 (Alteration, Extension and Change of Use of Listed Buildings); and the criteria in Local Plan Policy EN7 (Development Affecting Conservation Areas).
- 6.7 Consequently, there is no reason to withhold planning permission and listed building consent for the revised proposals on heritage grounds.

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